



Wiltshire Housing Site Allocations Plan

Submission draft plan

**Consultation Statement Regulation 22 (1) (c)
Appendix Q - Schedule of Representations**

May 2018

Wiltshire Council

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如果有需要我們可以使用其他形式（例如：大字體版本或者錄音帶）或其他語言版本向您提供有關威爾特郡政務會各項服務的資訊，敬請與政務會聯繫，電話：0300 456 0100，文本電話：(01225) 712500，或者發電子郵件至：customerservices@wiltshire.gov.uk

يمكن، عند الطلب، الحصول على معلومات حول خدمات مجلس بلدية ويلتشرير وذلك بأشكال (معلومات بخط عريض أو سماعية) ولغات مختلفة. الرجاء الاتصال بمجلس البلدية على الرقم ٠٣٠٠٤٥٦٠١٠٠ أو من خلال الاتصال النصي (تيكست فون) على الرقم ٧١٢٥٠٠ (٠١٢٢٥) أو بالبريد الإلكتروني على العنوان التالي: customerservices@wiltshire.gov.uk

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Na życzenie udostępniamy informacje na temat usług oferowanych przez władze samorządowe hrabstwa Wiltshire (Wiltshire Council) w innych formatach (takich jak dużym drukiem lub w wersji audio) i w innych językach. Prosimy skontaktować się z władzami samorządowymi pod numerem telefonu 0300 456 0100 lub telefonu tekstowego (01225) 712500 bądź za pośrednictwem poczty elektronicznej na adres: customerservices@wiltshire.gov.uk

Comment ID:	1	Consultee Mrs Joanne Baker Senior Estates Surveyor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Aggregate Industries UK Limited Person ID: 475682		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Figure A.44				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As operator of the safeguarded rail fed aggregates depot at Wootton Bassett, Aggregate Industries support the removal of the safeguarded rail depot from the settlement boundary for Wootton Bassett.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2	Consultee Mrs Marilyn White Person ID: 1104804	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective		
Please identify the policy, paragraph, table, figure or site to which you are referring.	S1028 - Land at Netherhampton Road				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	i am certainly not a NIMBY! I do not even live in Wiltshire anymore but am dismayed about the further building of houses on essentially an unspoilt prehistoric landscape and green belt. The country needs its green fields for multiple reasons such as farming, wildlife, and also land soaks up rainfall. Concrete does not. Also Salisbury just does not have the infrastructure, schools and healthcare to support these large scale developments. In essence stop ruining a beautiful county i.e. the whole of beautiful Wiltshire, consider looking at brownfield sites. Otherwise future generations are going to have nothing but concrete to look at which is certainly a horrific thought. Look at brownfield sites, not green belt or ancient landscapes. Consider heavily taxing second homes, looking at empty properties etc. Do not support.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3	Consultee Mrs Nicola Chesworth	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1104997	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I do not see the need for anymore houses in harnham. The school in harnham is not sufficient forvanymire. More traffic will come through harnham. Already busy.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	4	Consultee Mr Edward Owen	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1105335		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Bratton 321 Court Orchard/Cassways			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>My initial reaction is that the designated area (Court Orchard/.Cassways) is rather small for 40 homes and the access is very poor and will be dangerous if the development goes ahead.</p> <p>In the mornings there will be some 40 cars all trying to get onto the Westbury Road through a single road access. Perhaps half the cars will want to go to Trowbridge and so will turn left. From that direction turning into the Trowbridge Road is difficult and the road then becomes narrow and steeply descending.</p> <p>Would it not be better to have the development along the Lower Westbury Road and have, say, 10 points of access to Lower Westbury Road and also a new access onto the Trowbridge road. One could develop far more than 40 homes in this way and, if designed correctly, it should not spoil the view for any of the existing residents of Lower Westbury Road. A new link to the Trowbridge Road would mean that the new residents need not drive pass the existing residents.</p> <p>The cost of upgrading Lower Westbury Road and improving the link to the Trowbridge road could be a condition of the tender. If the number of houses were to be increased to, say, 50 or more, then the developer would be willing to fund the cost of the road building.</p> <p>My suggestion would improve the draft site allocations plan because the proposed site would not be an eye-saw to people entering Bratton from Westbury.</p> <p>It would not cause congestion, which the existing proposed plan would with only one access onto the Westbury Road.</p> <p>It would not create two accident risk points, one where the residents of Court Orchard/Cassways would be trying to turn onto the Westbury Road and one where increased traffic would be trying to pass down the Trowbridge Road which is narrow and steep.</p> <p>It would open up a new area for further development which should not be detrimental to existing home owners in Lower Westbury Road.</p> <p>The extra costs implied by my suggestion would not be a burden to the Council because the cost of the proposed road improvements could be part of the tender conditions to developers.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	5	Consultee Mr Alex Lawless	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105343	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Table 4.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Why are we looking to build new houses in the ever decreasing green areas of Trowbridge when we have a number of sites around the town that could do with development; for example the old Bowyers site? This just seems that the developers recognize they can make more money in the green areas but it will forever lose these for future generations while a site like Bowyers is just an eyesore.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	6	Consultee Miss Sarah Howard-Ames Person ID: 1105479	Agent Miss Sarah Howard-Ames Councillor Rowde Parish Council Person ID: 1105478	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Rowde Boundary H5:I5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Proposed new Core Village boundary incorrect grid reference H5:I5 in above plan and reference J8 on the plan displayed at Devizes Town Hall. Requires amendment to include new complete and occupied housing. 6 new bungalows located at Reed Place off Silverlands Road				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	7	Consultee Ms Rosie MacGregor Chair Press Trust Planning Committee	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Bradford on Avon Preservation Trust Person ID: 1106037		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Bradford on Avon Preservation Trust supports the Draft Wiltshire Housing Site Allocations Plan because it seeks to allocate new housing development to those towns that have the necessary infrastructure to support sustainable development, whereas new housing development in Bradford on Avon would be unsustainable.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	8	Consultee Mr David Hamblin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1106114		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.50		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan does not make enough of the opportunity to improve Trowbridge through-traffic by creating a new North-South link via other new road developments to the North and East of the town.</p> <p>The suggested redevelopment of the Woodmarsh / A363 roundabout needs substantial thought given to the demands of local traffic, bearing in mind the retail park one-way exit, and huge amounts of Saturday traffic caused by the shopping outlets and food drive-thoughts.</p> <p>This site could provide part of a strategic North to South Trowbridge bypass, if the Drynham Lane were to be rebuilt and linked to the Leap Gate road at the roundabout with West Ashton Road. Ultimately this bypass route should connect to the Frome Road either North or South of Southwick, and could then even extend West around to the Bradford Road, taking huge amounts of through traffic away from Newtown and Wingfield Road past the schools.</p> <p>A change in the Woodmarsh / A363 roundabout by the Spitfire Retail Park is required as the present system is subject to high traffic exiting the retail park one-way system.</p> <p>Any developments in Trowbridge should provide improved traffic links to decrease through-traffic in the town, and provide additional resources for the town such as schools, surgeries, parks, play areas, walking routes and areas for employment such as small retail units and light industrial units.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	9	Consultee Mr David Hamblin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1106114		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This site is part of the Southwick Country Park, and no building should be allowed here at all. No building should be allowed here at all - the park accesses should be enhanced to allow walkers to cross the stream. However, if building is to be allowed, this area is overlooked by properties on Church Lane and Whiterow Park, and any new buildings on this site should not be allowed to obstruct any views of the Country Park. Therefore any buildings should have a restriction on roof height to preserve existing views.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	10	Consultee Mr David Hamblin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1106114		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.74		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This development of this site should not be allowed to connect to the existing Frome Road, as the Whiterow hill stretch is already subjected to additional traffic at the Country Park car park. Therefore it should be linked via Spring Meadows.</p> <p>Any development to this site should be linked via Spring Meadows and kept well back from the Frome Road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	11	Consultee Mr David Hamblin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1106114		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This site should be viewed in the strategic context of a Trowbridge bypass route, connecting the South of the town to the East and Northeast improvements of Leap Gate and Elizabeth Way.</p> <p>This site could provide part of a strategic Trowbridge bypass route if extended through the football pitch and connected to the Frome Road and Woodmarsh / A363 roundabout (significantly improved) or the Ace and Cleaver Lane (if widened). This would allow traffic to be removed from Trowbridge - especially from Silver Street Lane which is used as a "rat-run", whilst also allowing access to the new buildings.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	12	Consultee mr robert heape	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1109996		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		fig 5.6 h2 12 paras 5.108,5.109,5.110			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>-the proposed development 'east of farrells field' appears completely inappropriate for the village.</p> <p>-the aonb status of the village is clearly compromised even if the boundary is technically outside of the aonb.</p> <p>-the adverse traffic implications for the B4039, and the safety issues around the school and surgery in particular are serious.</p> <p>-The access routes apparently considered will create a huge impact on the existing Farrells Field residents.</p> <p>-The western boundary as indicated appears to include our garden fence! And although the it is not clear what is intended for the farm track in this location, our property is only some 3 metres away!</p> <p>this track acts to some extent as a flood protection for the school and also carries beneath it the surface water drainage works for Blacksmith Close</p> <p>-We can see no information on the storm/surface water drainage from the proposed hosing site</p> <p>The existing drainage for Farrells Field and Blacksmith Close is into a pond which we were told is now at its useful capacity.</p> <p>Small scale additions to a village can be made without destroying its character and the quality of life for existing residents-the proposals being put forward are very the opposite.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	13	Consultee Ms Rachel Hunt Person ID: 1102653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Contradictions with National Policy A core strategy or local plan is considered “sound” when it is consistent with national policy. Paragraphs 17,111, 72, 156 and 157 of The National Planning Framework and Planning Guidance documents contain planning guidelines which have been contradicted in the way that Wiltshire Council have applied them to the Housing Sites Allocation Plan. I have taken some examples from paragraph 17 of the National strategy below:</p> <p>1. proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth</p> <p>The core strategy fails to follow this objective as delays at the West Ashton development mean that the extra schools planned for increased housing in Trowbridge will not be completed by the time that the other sites indicated in the site allocations plans are in place. Also, although improved road networks have been planned for the south east of Trowbridge, there is no such allowance for coping with the traffic generated at the A361 by the 265 houses allocated to this side of town. In fact, the Trowbridge Traffic Model concludes that there would be increased pollution, congestion, noise and journey times as a result of the proposed development. The Councils’ answer to this appears to be that since all development will be within a 2km boundary of the centre people will choose to walk or cycle. The walk into town is neither, pleasant or particularly safe and increased traffic would make walking into town less attractive.</p> <p>The A361 is a blackspot for accidents both “in the dip” where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. The Country Park is also used for running and parking along the A361 between Southwick and Trowbridge is a common cause of delays.</p> <p>In fact my husband was knocked off his bike when cycling along the Frome Road. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p> <p>I would like to invite the County Councillors, none of whom live in Trowbridge, to walk or cycle into town along the Frome Road to see how inviting it is not! On this basis alone, development at Church lane, OldBrick Fields and Southwick Court should not be considered.</p> <p>2. promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;</p> <p>The core strategy fails to meet this objective as there is no evidence that the centre of Trowbridge will be full of “vitality.” Housing should be built on the Brownfield sites, including Bowyers and the Old Library site in the town and the council needs to focus on a genuine redevelopment of the</p>			

	central pedestrian area of Trowbridge so that the centre is inviting and truly accessible by foot or bike by its' new residents. By doing this, rather than holding back sites within the existing settlement boundary, the beauty of the countryside on the outskirts of Trowbridge would be maintained..
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	14	Consultee MR keith leslie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1113883		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.20h3.2 HILLTOP WAY			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The methodology is faulty in this report in that the site history was not included in the report. Previous Inspectors in their earlier reports have strongly noted the gradual/gentle transformation from urban into country that this site provides. The present report reads as if there has been no history nor trail of reviews/planning applications and meetings and earlier reports by ministry inspectors. When in fact any application to build on this site has always been vigorously contested by the local residents of the whole estate of Pauls Dene</p> <p>For a "relatively small number of dwellings" the honesty of this review has been compromised. It is to be hoped that the integrity of this report will not be sacrificed in the desire to achieve the desire for a few single story affordable dwellings</p> <p>A planning review by a ministry inspector has taken place on 27 July 2017 whilst this democratic process is in train. there is a positive democratic deficit if the appeal by Pearce is agreed</p> <p>Remain with the status quo and not permit building on this peripheral site</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I live directly opposite the site and have been an active participant on previous occasions				

Comment ID:	15	Consultee Ms Rachel Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1102653	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		sites 1021 Church lane		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the rural and ecological environment National Planning Policy States: 112 - Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.</p> <p>113 - Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.</p> <p>As well as offering a rural setting for the heritage assets here, the land between Church Lane and Southwick Country Park provides a part of the buffer between Southwick and Trowbridge and is well used by local people. Both fields have had the same hedge line since at least 1890 as shown by the OS maps below. (dated 1890). Similar maps from the 1920's and 1940's show the exact same hedge line.</p> <p>In the more recent past, the first field has been used for grazing animals for at least the last 30 years and the larger field behind Framfield offers wide ranging views across the countryside and is home to pairs of deer as well as bats, rabbits, voles and a range of birds. In 1989 there was an application (w89/0140) to build 2 dwellings on the field behind Church Cottage, Church Lane. This planning proposal was refused on the basis that "the proposed development (of just 2 dwellings) would extend the built up area into open countryside, detrimental to the character of the area," (Extract from the decision notice) Also, the Secretary of State further notes (in the appeal document) that "the proposal would harm the rural character of the area" and that "the site is outside the limits of Trowbridge" which is still the case. Thirdly, the appeal document notes that the Plan "seeks to maintain a rural buffer between Trowbridge and Southwick. The proposal would encroach on open rural land and harmfully effect it's appearance.... The appeal site, which is part of a pasture field on the south side of Church lane, is in the pleasant open countryside between Trowbridge and Southwick"</p> <p>If this is the case for 2 dwellings, 40 dwellings would be extremely detrimental to the rural nature of this area. In fact, the addition of Southwick Country Park since this application would further promote the maintenance of this area as rural, alongside maintaining the setting of St Johns Church, former school houses and Church Cottage. There was also a historic application (ref APP/F3925/A/02/1082021) regarding an agricultural access off the A361 to the field to the south of Church Lane. This is the proposed site of access to the new dwelling on the Housing Site Allocation Plan. However, when this planning application went to appeal, the Inspector specifically states that there need to be considerations as part of the appeal success. Paragraph 12</p>				

states “In the future, for economic reasons, they would expect to lease or rent this land to a local farmer” On this basis the inspector goes on to say that this purpose “seems to be reasonable and therefore agricultural machinery and transport would require access to the field....tending of livestock would require a small number of visits by light vehicles.....Arable use may well involve particularly large vehicles and plant but only during more restricted periods”

Since this application the field in question has not been rented or used for agricultural purposes. The field was ploughed about three years ago, not for arable purposes or to grow crops but seemingly to prevent dog walkers and locals from enjoying the site and countryside. Also, it is clear from the above evidence that the access was granted ONLY for limited agricultural use NOT for construction or residential traffic which would clearly change the local area.

Finally, when purchasing 344 Frome Road in 2014 we contacted planning regarding future building on the fields that directly backs onto the Grade II listed cottage. In the reply they were informed that “the land that backs onto 344 is outside the development policy boundary for housing and therefore any application to develop the land is likely to be refused by the council.”

Protection of bats

The consultation document states that Bechstein Bats (and others) use the sites behind Church Lane and OldBrick Fields. The document states that bat corridors should be built into any proposed development. In fact the current owners of the larger field cut a large gap in the hedge some years ago (presumably to allow vehicles through).

I would request to see evidence that permission was given to the owners to make this gap in the historic hedgerow, and if so, evidence that an assessment of the impact on local wildlife was undertaken.

The defra document “Habitat management for bats A guide for land managers, land owners and their advisors” states that “even gaps as small as 10 m may prevent bats – especially the smaller species – from using hedgerows as a route to fly between roosts and foraging areas.” And that “Gaps should be replanted to ensure that the hedge can be used as a flight route.” Further gaps, which would inevitably be needed to develop the site, would affect the bats and other ecology of the site.

LPA’s are a competent authority under regulation 7 of theConservation of habitats and Species Regulations 2010(as amended)

The Bat Conservation Trust extract from “Bats and the Planning System” states that:
A protected species survey and report is required with the application when:

Having contacted a senior ecologist at Wiltshire Council on 18th July 2017, and requested information about bat surveys for the Church lane and Oldbrickfields sites she told me that she had no knowledge of surveys that had been carried out for these sites. In fact, I am still waiting for the head of department to contact me to confirm this.

Also there is concern that, the inevitable cutting back of historic hedgerows would impact upon the bats. In addition, extra lighting within 50m of bat habitats and development within 200m of the Lambrok requires a survey and licence to be given.

Residents regularly see bats in their gardens and flying over the paddock at the Church Lane sites as well as volunteers at Southwick Country Park confirming that there is a roost in the oak trees at the bottom of the larger field.

The present proposed development suggests mitigation of a bat corridor which is just 10-16m wide. I would suggest that the width of this corridor needs to be widened and needs to include a boundary along the edge of the Lambrok, existing hedgerows in the field, along Church lane as well as houses that back onto the paddock.

Attached files (Please see Objective)

4650938

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Because it is important that local voices are heard

Comment ID:	16	Consultee Lionel Davel	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1114552		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		SHLAA Reference - Yatton Keynell - 482 - East of Farrells Fields - 30 Dwellings			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Additional traffic through an already busy B4039 Reduction to green space on entering the village, that currently acts as a boundary An extension to the village boundary can only encourage and change boundaries elsewhere in the village where there are neighbouring green spaces Expansion to Yatton Keynell into Tiddlewink and beyond 5th development in the village in a number of years Considerable impact on resources - School / Surgery already at capacity (with little or no room to expand) School choice for many a village school - why try and expand it so it is the size of another town school? Major housing estate in our village Current access is unknown - either as you enter the village which is on a bend and with poor visibility is dangerous, back of Black Smiths Close which is very narrow suitable for single vehicle,back of Farrells Field which is currently a safe cul de sac where children play. Find a more suitable site allocation that will not negatively impact safety, traffic, green space, resources and facilities. Please help us to retain the nature of our village community without making changes to our village boundaries.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To listen to the examination and to ensuring our concerns are expressed where and if appropriate.				

Comment ID:	17	Consultee Mr Alan Russell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1114697		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.2 Hilltop Way, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The consideration of access roads has not been properly considered. For example, the Hilltop Way proposed development of 10 dwellings does not consider the need to improve the road that is Hilltop Way which was designed when there were significantly less dwellings than now let alone with 10 new ones, is too narrow and has poor sight lines for the amount of traffic it currently has, let alone any more traffic. Furthermore, consideration of the impact the development will have on the skyline in the area and of the cathedral have been ignored. This has not been thought through properly. Better consideration of access roads and the need to improve them if any further developments are allowed. Better consideration of the impact new dwellings will have on the city and in particular views of the cathedral which is what makes the city of Salisbury unique. .				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	18	Consultee MR NICHOLAS KENDALL	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1114350	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		298			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My understanding is that the majority of Site 298 A363 White Horse Park has not been made available by the owners for development. One are shown is in fact already the site of Hitachi The boundary shown cuts through my back garden is not available for development Re draw site 298 to represent the true picture of availability				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	19	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Annex 1 A12 clearly states the proposed land could accommodate approximately 32 dwellings. The Community Area Topic Paper ignores this report by proposing 40. The Plan is unsound due to the conflicts. The Plan and supporting documents need to be consistent.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	20	Consultee Mr Peter Fielding	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1054315		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Settlement Boundary Review for Hilperton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have several comments I wish to make about the plan which I will make separately. This particular comment relates to the settlement boundary for Hilperton and in particular the revision to the boundary for houses along Devizes Road. The existing boundary runs along the Northern edge of my property (number 181) and several of the neighbouring properties. The new boundary runs halfway through my garden leaving part of the property within the new settlement boundary and a large chunk of my garden outside the boundary.</p> <p>My house along with my immediate neighbours was built in the 1930s with their respective garden settings. I can see no good reason why 80 years later it is suddenly necessary to adjust the settlement boundary to remove part of my property. This is all the more frustrating when I note that some properties in the village, including some in Devizes Road, have had their settlement boundaries extended even though they are of a similar age to mine.</p> <p>I would respectfully ask that the boundary for my property and by definition that of my immediate neighbours remain as currently defined with the northern end of my garden forming edge of the settlement boundary.</p> <p>Leave the settlement boundary for number 181 Devizes Road and at least its immediate neighbours as currently defined and not adjusted as to remove part of the properties as proposed in the 2017 review.</p> <p>I have comments about other parts of the Plan which will be made separately</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	21	Consultee Mr Iain Cowan	Agent Mr Iain Cowan Owner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1115490	Cowan Land Ltd Person ID: 1115452	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H 2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Mr Stuart Brown is owner of the northern section of the site and he confirms his intention to promote the land via a specialist promoter who will soon be appointed. Please the Title Plan WT244847 attached. 16 Woodmarsh is also in the same ownership and a plan is attached; this could be used as a point of access.				
Attached files (Please see Objective)	4661170				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	22	Consultee Mrs Nikki Spreadbury-Clews Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Shrewton Parish Council Person ID: 1115637		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		No comment on the Plan			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Shrewton Parish Council have reviewed the plan and have no comments.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	23	Consultee Mrs Amanda Le Pape	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1115636		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Broad Hinton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There are a number of houses within our village which are not included within the proposed revised village boundary. These house date from the early 1800's so may be considered established within the community. In addition to this there is land to the north/northwest of the village which is suitable for building in line with the governments core strategy for building houses and has not been included. Building a small and sensitive development here would be welcomed by the village and the local amenities (school, church, pubs etc). This is a great opportunity to ease this process.</p> <p>Include the fields to the north/northwest of the village hall and new proposed boundary to build sustainable and affordable housing thereby encouraging younger families into the village and redressing the imbalance currently experienced in the ageing population of the village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Simply for clarification.				

Comment ID:	24	Consultee Mr KB Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1115782	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I appreciate there is a need for new housing within the County. However it seems unreasonable that the majority of the required new homes are apparently to be built in the Trowbridge area with the resultant strain this will put on (already struggling) local services, especially schools. The recent development on the Hilperton side of the town has already seen that village become part of Trowbridge in all but name. The opening up of land beyond Drynham Lane (parcel nos. 613/248 & 298 on the Proposed housing allocation plan) for development will have the effect of virtually joining North Bradley to Trowbridge.</p> <p>While development of parcel no. 3565 on the Plan would not, at this point in time, connect Southwick with Trowbridge any permitted development would almost certainly prove to be 'the thin end of the wedge' as far as any developer is concerned, and it will be only a matter of time before the remaining green fields are built upon.</p> <p>In short Trowbridge will become one massive urban 'sprawl', undistinguishable from the adjoining villages.</p> <p>I sincerely hope that the Council's officers and the elected Councillors responsible for planning in Wiltshire will seek to safeguard the remaining countryside around Trowbridge, and indeed the other towns in what is still regarded as a rural County.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	25	Consultee Mr KB Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1115782	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I believe that planning permissions have already been granted for over 5,000 homes, yet to be built, within the County. It is my further understanding that Government policy states that 'sites with planning permission should be considered deliverable'. Consequently there would appear to be no present need for more green fields to be earmarked for development.</p> <p>While I appreciate the Council cannot force developers to build, a decision not to allocate more land for housing would hopefully 'encourage' development of sites for which permission has already been granted, particularly brownfield sites.</p> <p>I sincerely hope that the Council's officers and the elected Councillors responsible for planning in Wiltshire will seek to safeguard the remaining countryside around Trowbridge, and indeed the other towns in what is still regarded as a rural County.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	26	Consultee Mrs Marilyn White	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1104804		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 - Land to North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>i am certainly not a NIMBY! I do not even live in Wiltshire anymore but am dismayed about the further building of houses on essentially an unspoilt prehistoric landscape and green belt. The country needs its green fields for multiple reasons such as farming, wildlife, and also land soaks up rainfall. Concrete does not.</p> <p>Also Salisbury just does not have the infrastructure, schools and healthcare to support these large scale developments.</p> <p>In essence stop ruining a beautiful county i.e. the whole of beautiful Wiltshire, consider looking at brownfield sites. Otherwise future generations are going to have nothing but concrete to look at which is certainly a horrific thought.</p> <p>Look at brownfield sites, not green belt or ancient landscapes.</p> <p>Consider heavily taxing second homes, looking at empty properties etc.</p> <p>Do not support.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	27	Consultee Ms Rachel Hunt Person ID: 1102653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Contradictions with National Policy A core strategy or local plan is considered “sound” when it is consistent with national policy. Paragraphs 17,111, 72, 156 and 157 of The National Planning Framework and Planning Guidance documents contain planning guidelines which have been contradicted in the way that Wiltshire Council have applied them to the Housing Sites Allocation Plan. I have taken some examples from paragraph 17 of the National strategy below:</p> <ol style="list-style-type: none"> proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth <p>The core strategy fails to follow this objective as delays at the West Ashton development mean that the extra schools planned for increased housing in Trowbridge will not be completed by the time that the other sites indicated in the site allocations plans are in place. Also, although improved road networks have been planned for the south east of Trowbridge, there is no such allowance for coping with the traffic generated at the A361 by the 265 houses allocated to this side of town. In fact, the Trowbridge Traffic Model concludes that there would be increased pollution, congestion, noise and journey times as a result of the proposed development. The Councils’ answer to this appears to be that since all development will be within a 2km boundary of the centre people will choose to walk or cycle. The walk into town is neither, pleasant or particularly safe and increased traffic would make walking into town less attractive.</p> <p>The A361 is a blackspot for accidents both “in the dip” where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. The Country Park is also used for running and parking along the A361 between Southwick and Trowbridge is a common cause of delays.</p> <p>In fact my husband was knocked off his bike when cycling along the Frome Road. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p> <p>I would like to invite the County Councillors, none of whom live in Trowbridge, to walk or cycle into town along the Frome Road to see how inviting it is not! On this basis alone, development at Church lane, OldBrick Fields and Southwick Court should not be considered.</p> <ol style="list-style-type: none"> promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it; 				

The core strategy fails to meet this objective as there is no evidence that the centre of Trowbridge will be full of “vitality.” Housing should be built on the Brownfield sites, including Bowyers and the Old Library site in the town and the council needs to focus on a genuine redevelopment of the central pedestrian area of Trowbridge so that the centre is inviting and truly accessible by foot or bike by its’ new residents. By doing this, rather than holding back sites within the existing settlement boundary, the beauty of the countryside on the outskirts of Trowbridge would be maintained.

3. support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings

The sites at Church lane, Southwick Court and OldBrickfields (all identified in the Site Allocations Document) are all susceptible to flooding and construction here will further exacerbate flooding in Southwick Country Park which is a public Amenity. The Environment Agency’s website under the Flood Map for Planning tool has been interrogated (28th June 2017). It shows that the lower end of the proposed development site registers as a category flood zone 2 or 3 which requires the developer to carry out a Comprehensive Flood Risk Assessment.

The outline planning application that Trowbridge Town Council was consulted on identifies the Church Lane site as the whole field right down to the Lambrok Stream. This area includes the floodplain zone 2/3 section of the field. The Trowbridge Town Clerk advises, however, that when the planning application progresses he expects the developer only to include the upper two-thirds of the field, the section above the floodplain (flood zone 1) which does not normally require any flood risk assessment. However, given that any run-off of water from the development would pass straight into the flood zone 2/3 area and into the Lambrok Stream with all the associated risks outlined above to the immediate neighbourhood as well as elsewhere up and downstream I believe the development should still be disallowed on flooding grounds.

Therefore the core strategy does not support the objective above.

4. contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;

There is a complete contradiction in the core strategy to this objective. As stated above, pollution will increase due to increased traffic, the council shown that they will effectively use brownfield sites, opting for developer led/friendly sites on the outskirts of town. The site at Church Lane, OldBrickfields and Southwick Court would be an unwarranted encroachment of the open countryside, the very reason given by the council for refusing a planning application in Southwick at Blind lane.

5. promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);

Once again, Councillors have stated that there should not be a mix of residential and commercial land on one site. This directly contradicts national planning policy. The lack of inclusion in developing the Bowyers site as part of the planned housing in Trowbridge does not comply with National Planning Policy paragraph 111.

There is no reason why the Bowyers site, Old Library site and others cannot be used for affordable housing as well as being used to improve the vitality of the town centre. In fact, I would argue that, young people attempting to get onto the housing ladder would prefer to be in the centre where they can access cafes, shops and entertainment as well as the train station which provides direct access for commuting to Bath.

The outskirts of town should be used for the open land functions stated in the objective above.

6. conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

	<p>The Housing Site Allocations Document has failed to include all heritage sites at the three sites off Frome Road. Whilst it has identified Southwick Court and St John's Church it has not made reference to the following Grade II listed buildings:</p> <ul style="list-style-type: none"> - St Johns Church School and Hall masters dwellings comprising 4 dwellings. (UID1021593) - Church of St Johns (UID 1364192) - 344 Frome Road (UID 1364193) - Rose Villa (UID 1021594) . <p>It has also neglected to protect the ancient watermeadows: MWI73579 Water Meadow, West of Upper Studley. Maintaining the setting of historic features is identified in the core strategy and yet seems to have been neglected when considering sites to develop, priority being given to developer friendly land.</p> <p>In conclusion, it appears that Wiltshire Councillors, none of whom live in Trowbridge, have arbitrarily set a 2km radius from St James's Church as the allowable developable area for the town without taking account of the value of this land to the people of Trowbridge. The clear contradictions within the strategy itself and against national planning policy mean that Wiltshire Council will need to revisit how they plan to develop Trowbridge in a more sustainable way than that outlined in the current Strategy.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	28	Consultee Ms Rachel Hunt Person ID: 1102653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Contradictions with National Policy A core strategy or local plan is considered “sound” when it is consistent with national policy. Paragraphs 17,111, 72, 156 and 157 of The National Planning Framework and Planning Guidance documents contain planning guidelines which have been contradicted in the way that Wiltshire Council have applied them to the Housing Sites Allocation Plan. I have taken some examples from paragraph 17 of the National strategy below:</p> <p>1. proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth</p> <p>The core strategy fails to follow this objective as delays at the West Ashton development mean that the extra schools planned for increased housing in Trowbridge will not be completed by the time that the other sites indicated in the site allocations plans are in place. Also, although improved road networks have been planned for the south east of Trowbridge, there is no such allowance for coping with the traffic generated at the A361 by the 265 houses allocated to this side of town. In fact, the Trowbridge Traffic Model concludes that there would be increased pollution, congestion, noise and journey times as a result of the proposed development. The Councils’ answer to this appears to be that since all development will be within a 2km boundary of the centre people will choose to walk or cycle. The walk into town is neither, pleasant or particularly safe and increased traffic would make walking into town less attractive.</p> <p>The A361 is a blackspot for accidents both “in the dip” where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. The Country Park is also used for running and parking along the A361 between Southwick and Trowbridge is a common cause of delays.</p> <p>In fact my husband was knocked off his bike when cycling along the Frome Road. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p> <p>I would like to invite the County Councillors, none of whom live in Trowbridge, to walk or cycle into town along the Frome Road to see how inviting it is not! On this basis alone, development at Church lane, OldBrick Fields and Southwick Court should not be considered.</p> <p>2. promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;</p>				

The core strategy fails to meet this objective as there is no evidence that the centre of Trowbridge will be full of “vitality.” Housing should be built on the Brownfield sites, including Bowyers and the Old Library site in the town and the council needs to focus on a genuine redevelopment of the central pedestrian area of Trowbridge so that the centre is inviting and truly accessible by foot or bike by its’ new residents. By doing this, rather than holding back sites within the existing settlement boundary, the beauty of the countryside on the outskirts of Trowbridge would be maintained.

3. support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings

The sites at Church lane, Southwick Court and OldBrickfields (all identified in the Site Allocations Document) are all susceptible to flooding and construction here will further exacerbate flooding in Southwick Country Park which is a public Amenity. The Environment Agency’s website under the Flood Map for Planning tool has been interrogated (28th June 2017). It shows that the lower end of the proposed development site registers as a category flood zone 2 or 3 which requires the developer to carry out a Comprehensive Flood Risk Assessment.

The outline planning application that Trowbridge Town Council was consulted on identifies the Church Lane site as the whole field right down to the Lambrok Stream. This area includes the floodplain zone 2/3 section of the field. The Trowbridge Town Clerk advises, however, that when the planning application progresses he expects the developer only to include the upper two-thirds of the field, the section above the floodplain (flood zone 1) which does not normally require any flood risk assessment. However, given that any run-off of water from the development would pass straight into the flood zone 2/3 area and into the Lambrok Stream with all the associated risks outlined above to the immediate neighbourhood as well as elsewhere up and downstream I believe the development should still be disallowed on flooding grounds.

Therefore the core strategy does not support the objective above.

4. contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;

There is a complete contradiction in the core strategy to this objective. As stated above, pollution will increase due to increased traffic, the council shown that they will effectively use brownfield sites, opting for developer led/friendly sites on the outskirts of town. The site at Church Lane, OldBrickfields and Southwick Court would be an unwarranted encroachment of the open countryside, the very reason given by the council for refusing a planning application in Southwick at Blind lane.

5. promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);

Once again, Councillors have stated that there should not be a mix of residential and commercial land on one site. This directly contradicts national planning policy. The lack of inclusion in developing the Bowyers site as part of the planned housing in Trowbridge does not comply with National Planning Policy paragraph 111.

There is no reason why the Bowyers site, Old Library site and others cannot be used for affordable housing as well as being used to improve the vitality of the town centre. In fact, I would argue that, young people attempting to get onto the housing ladder would prefer to be in the centre where they can access cafes, shops and entertainment as well as the train station which provides direct access for commuting to Bath.

The outskirts of town should be used for the open land functions stated in the objective above.

6. conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

	<p>The Housing Site Allocations Document has failed to include all heritage sites at the three sites off Frome Road. Whilst it has identified Southwick Court and St John's Church it has not made reference to the following Grade II listed buildings:</p> <ul style="list-style-type: none"> - St Johns Church School and Hall masters dwellings comprising 4 dwellings. (UID1021593) - Church of St Johns (UID 1364192) - 344 Frome Road (UID 1364193) - Rose Villa (UID 1021594) . <p>It has also neglected to protect the ancient watermeadows: MWI73579 Water Meadow, West of Upper Studley. Maintaining the setting of historic features is identified in the core strategy and yet seems to have been neglected when considering sites to develop, priority being given to developer friendly land.</p> <p>In conclusion, it appears that Wiltshire Councillors, none of whom live in Trowbridge, have arbitrarily set a 2km radius from St James's Church as the allowable developable area for the town without taking account of the value of this land to the people of Trowbridge. The clear contradictions within the strategy itself and against national planning policy mean that Wiltshire Council will need to revisit how they plan to develop Trowbridge in a more sustainable way than that outlined in the current Strategy.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	29	Consultee Mrs Amanda Le Pape	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1115636		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Broad Hinton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There are a number of houses within our village which are not included within the proposed revised village boundary. These house date from the early 1800's so may be considered established within the community. In addition to this there is land to the north/northwest of the village which is suitable for building in line with the governments core strategy for building houses and has not been included. Building a small and sensitive development here would be welcomed by the village and the local amenities (school, church, pubs etc). This is a great opportunity to ease this process.</p> <p>Include the fields to the north/northwest of the village hall and new proposed boundary to build sustainable and affordable housing thereby encouraging younger families into the village and redressing the imbalance currently experienced in the ageing population of the village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Simply for clarification.				

Comment ID:	30	Consultee ms sandra meaden	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116631	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	How on earth do you think the Netherhampton Road can sustain the extra traffic that an additional 840 dwellings would bring? The traffic is already terrible in the rush hours and there is no scope to change the road layout to accommodate extra traffic. There are already long traffic queues tailing back from Harnham Junction, where the traffic lights barely stay green for long enough to allow no more than maybe 8 cars through at a time. Also there is no infrastructure in place in the locality. There is currently no bus route that goes that far along Netherhampton Road. There is no supermarket. There are no doctors surgeries. There is no provision for a school, junior or senior. The closest grocery store we can get to is Tesco, which located on Southampton Road, is more often than not gridlocked and a real chore to get into and out of. You must consider the detrimental impact such a development would have on the people that already live here. This is not being a NIMBY, it is being realistic that this would saturate our roads. If road improvements could be made, then I could see the sense in the development - but you cannot change anything here. Find somewhere more sensible where you would not inflict misery on the existing residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	31	Consultee Ms Rachel Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1102653	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Allocations		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>1. Review of Atkins “Wiltshire Housing Site Allocations Plan”</p> <p>Atkins were employed to review the six key sites identified by Wiltshire council for housing:</p> <p>Elizabeth Way – 205 houses</p> <p>White Horse Business Park – 150 houses (67% negative impact vs 33%positive)</p> <p>Elm Grove Farm – 200 houses</p> <p>Church Lane – 45 houses (83% negative impact to 17% positive)</p> <p>Upper Studley – 20 houses (80 % negative impact vs 20% positive)</p> <p>Southwick Court – 180 houses (71% negative impact vs 29% positive)</p> <p>Each site was assessed against the following headings Bio-diversity, Water, Historic Environment, Landscape, Accessibility, Education and Housing/ Employment provision. They were given a rating against each objectives (negative impact or positive impact.)</p> <p>The land at Church Lane was the least attractive site of all six.</p> <p>In addition, the sites at Elizabeth Way, White Horse Business Park and Elm Grove farm provide infill between existing developed sites whereas the other three sites would impinge on open countryside.</p> <p>In fact, the recent planning application for 100 plus houses off Blind lane was refused on the basis that it provided “an unwarranted encroachment of the open countryside”. This is also the case at the Church Lane, Southwick Court and Upper Studley sites. This was rejected based on paragraph 17 of the National Planning Framework:</p> <p>Core planning principles 17.</p> <p>Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:</p>			

- be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;
- not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;
- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
 - support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
 - contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
 - encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
 - promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
 - conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
 - actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
 - take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

The Church Lane (site 1021) and Upper Studley (site 3620) proposed sites in Trowbridge form the outer boundary of the town and lead into beautiful, unspoilt countryside which forms the buffer between Trowbridge and Southwick. Provision of new housing in Trowbridge should make use of sites which do not extend into open countryside before rural sites. This paragraph will put forward other sites within the current settlement boundary which would provide the same housing capacity whilst maintaining the Wiltshire Countryside.

The Church lane and Upper Studley sites offer 6ha of developable land. Wiltshire Council could easily offer this land using a variety of sites which are within the town. The following sites should be used before encroaching on our countryside:

Site 645,646 and 647 – Land to the rear of Trowbridge Road (over 2 ha)

Whilst this land is currently agricultural, it provides an infill between two residential areas and should therefore be used before open countryside.

Site 1018 – District Council Offices (2.46ha)

Seen as windfall by the council but should be offset against open countryside.

Site 198 – Land and Buildings (0.33ha)

Site 200 – Trowbridge Garden Centre (1.33ha)

This land is ripe for development and again provides infill between residential areas

Site 247 – The Stables (0.7ha)

Site 248 - Dryhnam Lane (1.68 ha not yet accounted for)

	<p>This site is ideal for development as it would complement development which is already planned for this part of town These sites alone would provide 8.5ha of land for development which would mean that none of the open land between Southwick and Trowbridge need be touched. All of these sites could be developed within the next 10 years. In addition to this there is: Site 613 – Land off the A363 White Horse Business Park to....(5.7ha) Although agricultural land, this site provides infill between existing development as opposed to open countryside. In addition to these, other sites were dismissed as part of the SHLAA, the reason given for this was that they were within the current settlement boundary. The National Planning Policy states, “planning policies and decisions should encourage the effective use of land by re-using land.” It appears that Wiltshire Council have decided that developing infill sites would be less attractive to developers and have therefore chosen open sites which do not need to be built on to fulfil their housing quota. Surely Wiltshire Council should not opt for the easy, developer led option to the detriment of our countryside, wellbeing and wildlife.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	32	Consultee K Shaw	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1116908	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst I fully understand and support the need for additional housing (particularly affordable housing in what is an expensive area), without a bypass, Salisbury will grind to a halt. The road infrastructure already does not cope with the volume of traffic, and that's on a normal day. On weekends and during holiday periods, it is a disaster. What's more, I believe this plan is either very close to a proposed bypass route, or actually on it, which means that we are running out of options to solve the traffic problem. Don't underestimate how much of a problem it is. I know Wiltshire Council seems to treat Salisbury (the only city in Wiltshire!) as a low priority, but enough is enough, time to solve the problem properly, and in conjunction with a major building project seems to be exactly the right time (beyond time actually!) to address it. I know the bypass was cancelled due to political reasons rather than practical, for point scoring at the time, but the politicians need to get real. You can't simply keep squeezing houses into an area without properly addressing infrastructure, and the road system is by far already the worst in the area by a long long way!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	33	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Core Policy referred to identifies and approximate number of new homes and Table 2.2 identifies Indicative residual numbers. These are not 'absolute' numbers with no attempt to support their justification. With the significant number of negatives for developing site 321 should these facts be ignored by allocating land without a proven need?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	34	Consultee Ms Rachel Hunt Person ID: 1102653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site 1021 Church lane				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to air my concerns about the choice of site 1021 (Church Lane) at a site for the proposed development of at least 40 dwellings. Planning policy states that councils should maintain the setting of Heritage Sites. Whilst the Draft Housing sites Allocations Plan does acknowledge St Johns Church and Southwick Court, it fails to mention the other listed buildings that surround this site. The sites at the back of Church Lane provide a rural setting for 6 Grade II Listed buildings as follows: - St Johns Church School and Hall masters dwellings comprising 4 dwellings. (UID1021593)</p> <ul style="list-style-type: none"> - Church of St Johns (UID 1364192) - 344 Frome Road (UID 1364193) - Rose Villa (UID 1021594) . <p>National policy states that:</p> <p>129 - Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.</p> <p>132 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.</p> <p>The photographs below clearly show that current development on this side of town has enabled these buildings to maintain their historic setting. Taken from Southwick Court Drive 2017 Taken from Southwick Country Park 2017</p> <p>Taken from the bottom of Southwick Country Park</p> <p>Taken from Church Lane In addition to the listed buildings at this site there is also an ancient water meadow:</p>			

	<p>MWI73579 Water Meadow, West of Upper Studley</p> <p>Summary A post medieval water meadow is visible as earthworks on air photographs.</p> <p>References National Monuments Record, ST 85 NW 95 English Heritage Archives, 1577543</p> <p>Grid reference ST 8403 5643 (map quarter sheet ST85NW)</p> <p>The site at Church lane should be maintained as open countryside to uphold the setting of these heritage buildings. Building in any of the current paddock would dramatically affect their setting, but also development of the larger field would impact on the open countryside that these buildings have shared for over 200 hundred years.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	35	Consultee Mr James Woodhouse	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1117609		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.36 Oaksey			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Planning permission 16/04578/FUL for 4 residential houses has been granted on SHLAA site 684. The Oaksey settlement boundary should be extended/updated to incorporate the site that has been granted planning under 16/04578/FUL on the Eastern edge of the village.</p>				
Attached files (Please see Objective)	4667476				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	36	Consultee Martin Noutch	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1117629		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In January 1995 our eldest daughter started school at The Grove and then on to The Clarendon College. During her fourteen years at school she was taught in temporary buildings. She is now a primary teacher in a local school and guess what? Yes you've guessed it, she's teaching in a temporary building.</p> <p>During this period numerous homes have been built in the catchment areas but no additional schools, just additional temporary buildings. How can you propose more homes when our local schools are stretched to the limit and there has been a failure to provide proper teaching facilities. It is reported that the developer will give a donation to Walwayne School, a school some distance away, nowhere near the proposed development, further away from the most local schools. This is madness. It shows that the proposed developer has no local knowledge of the local area and it's needs.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	37	Consultee Ms Emma Sylvester Deputy Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Bradford on Avon Town Council Person ID: 903313		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	The whole document				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to let you know that Bradford on Avon Town Council supports this document.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	38	Consultee Mr James Woodhouse	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1117609		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.36		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The settlement boundary has not been updated to represent the approval of planning permission on SHLAA site 684 located on the eastern approach of the village. Planning 16/04578/FUL was approved in August 2016 for 4 houses. Please update the Oaksey settlement boundary to include what was SHLAA site 684.</p> <p>Have any checks been done with the land owner to confirm that SHLAA site 3128 (Wick Road) in Oaksey is still available. The SHLAA application was submitted along time ago and the land has subsequently been sold to a new owner.</p> <p>SHLAA site 3128 (Wick Road) in Oaksey is clearly not capable of delivering 11 houses; the document “planning-shlaa-appendix-3-malmesbury” recorded a maximum allocation for SHLAA site 3128 of 7 back in 2014. Therefore there is a lack of consistency between policies/documents. A site must be confirmed as deliverable before it can be considered to be allocated and that clearly is not the case, at present, with SHLAA site 3128.</p> <p>An additional, deliverable, site in Oaksey needs to be identified to meet the minimum requirement of 11 houses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	39	Consultee Owen Upton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1117869		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I've taken a look at the Site Allocations Plan and note that Farrells Field is identified as a site for further expansion. Please find my comments below:</p> <p>1) I would want any development to be affordable for young families and for older people. I would also want it to incorporate environmentally sound construction and energy management (e.g. solar, rainwater storage, etc); to encourage physical recreation through the provision of access to the village on foot and by bicycle. The appearance would need to develop, rather than damage, the village landscape.</p> <p>2) Access to the site is a particular concern. Should the development occur, I would be in favour of separate access from B4039 east of the existing Farrells Fields cul-de-sac.</p> <p>I would be explicitly against access from Blacksmith Close for reasons of:</p> <ul style="list-style-type: none"> -- safety; both Farrells Field and Blacksmith Close are family dominated and increasing traffic would increase the likelihood of an accident; school traffic congestion would also increase (which is an issue at present) -- environment: there would be an impact on established trees and woodland which would be contrary to the aims of the sustainability report; this area is host to much wildlife which currently thrives in the area bordering the site and school. -- impact to the Blacksmith Close properties, which would be severe <p>3) There is a broader question of floodwater control - the area between Blacksmith Close and the school and the fields behind are used as a soakaway which originally struggled to function as it should. Any further development would run the risk of compromise the drainage systems further.</p> <p>4) 31 properties sounds excessive given the smaller developments that have taken place over the last 10 years in the village - an increase in the village population of 10% and a potential for 60-70 extra cars within a small space.</p> <p>If you have any questions, don't hesitate to come back to me.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	40	Consultee k j Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118090	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 North of Netherhampton Rd S1028 Netherhampton Rd			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write to object to the proposals outlined in your Draft Plan. S1027 and S1028</p> <p>It does not seem possible that anyone with knowledge of the traffic problems in Harnham has had any input into the formulation of this plan so far as these sites are concerned.</p> <p>The 740 houses, school, medical centre, industrial units etc. will generate a large amount of vehicular traffic. The only route options available to all these vehicles is Netherhampton Road, going east to the Harnham Gyratory, or west to Wilton, via Park Wall. Each of these choke points is already at, or certainly very near, full capacity.</p> <p>Your document states "The site does not generate pupil numbers sufficient to justify a new school", which will inevitably mean that car journeys will be made to the school from other parts of the city, increasing the problem.</p> <p>The document also states "fairly accessible locations for the city centre that could reduce the need to travel and/or reliance on the private car". This is nonsense; there is little within easy walking distance. Also "contribute to the local economy through use of local shops". Harnham has a small "One Stop", fish bar, In Excess, and garden centre. For the majority of shopping it is necessary to travel, either to Salisbury or Wilton.</p> <p>You refer to "A refresh of the Salisbury Transport Strategy can occur alongside a detailed Transport Assessment to address the site's traffic impacts". Surely this should have been done before these sites were considered for inclusion in the plan. It shouldn't take any traffic analyst long to conclude that the volumes likely will be unacceptable. Netherhampton Road is already busy with HGVs, agricultural vehicles (especially on Tuesdays), coaches (often tourist), delivery vans (thanks to on-line shopping), in addition to private cars. Cyclists generally avoid the roadway and use the pavement, to the detriment of pedestrians.</p> <p>The plan suggests that there could be improved public transport, but this is by no means certain. Bus companies are reliant on generating profit, so will only consider changing routes if the accountants can see justification. One only has to look at the Wellworthy Drive development adjoining the proposed sites to see that Wiltshire Council allowed the developer to cram too many dwellings and insufficient parking with the result that buses could not serve the estate (and emergency services must hope that their vehicles are never needed during evenings and weekends!).</p> <p>In conclusion, I do hope that sense will prevail and that the Netherhampton Road sites are removed from the plan without further public money being wasted.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	41	Consultee k j Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118090	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other - Land Ownership			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land Ownership Where land is currently designated as "Agricultural" it seems to me that any land owner should not enjoy a windfall if Wiltshire Council decide to change the category. It seems only fair that compulsory purchase powers be used to purchase the land at a fair rate for agricultural land, so that the community (via the Council) benefits from the profit.</p> <p>Wiltshire Council has a poor record in standing up to developers and making them fulfil their obligations for community project work on large developments (Old Sarum being an example). Controlling the "land profit" would empower the Council.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	42	Consultee k j Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118090	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other - Brexit			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Brexit Given that we are to leave the EU, has an impact assessment been carried out? The population of England has been growing largely because of uncontrolled immigration, do we still need the same number of new dwellings when this is no longer to be a factor?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	43	Consultee k j Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118090	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other - Salisbury exhibition			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Consultation I attended the exhibition at Salisbury Guildhall. I was astonished that it was only there for one day. It is July, people go on holiday! Also the documents provided were very poorly presented. It took a great deal of time to find anything in the reports as the indexing and page references were poor, or totally lacking. The Council staff had the same difficulty; no one could navigate the reports with ease. So few copies were available that you had to wait. The experience was dispiriting enough, and not improved when one attendee left the room sobbing!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	44	Consultee k j Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118090	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Notification of Plan publication			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Notification I was only aware of the Draft Plan from the Salisbury Journal, and, a few days before the Guildhall Presentation, a letter from a local Salisbury City Councillor. Had I not read the Journal, and lived outside Harnham Ward I wonder how I would have known of the Plan. I do not consider this to be open handed democracy.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	45	Consultee k j Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118090	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Site Allocations Plan webpage			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Website Your website is not a good one. The process of getting to the numerous documents is very complex, and was not helped by the fact that the site crashed or "froze" several times. This is why I am writing a letter, rather than go through more frustration using your website to respond.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	46	Consultee Mrs Anne Riddle	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1118211		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There has not been a public consultation about the change in the scale of development proposed on this site which was previously a 'reserve' site for a smaller number of houses. There were thousands of objections to development there, even on a smaller scale, at the time of the Core Strategy.</p> <p>Carry out a meaningful public consultation on the issues involved.</p> <p>Insufficient public consultation.</p> <p>More effective public consultation.</p> <p>Since this high-quality agricultural land has already (misguidedly, in my opinion) been designated a 'reserve' site for housing, I accept that some development is inevitable.</p> <p>However, on the scale proposed it is not possible to argue that it is sustainable.</p> <p>740 homes can be expected to generate at least 1,000 and possibly as many as 1,500 extra vehicle movements at the beginning and end of each working day, plus delivery and service vehicle movements at all times.</p> <p>This traffic will have to pass along Netherhampton Road, either to Harnham Gyratory or to the Park Wall junction, both of which were acknowledged in the council's 2012 Salisbury Transport Strategy to be operating at or close to capacity. (The Strategy warned that improving the Park Wall junction and turning the Gyratory into a T junction could attract even more traffic through Harnham.)</p> <p>Since there are few employment opportunities locally, many of these additional residents will then commute out of Salisbury, exacerbating in particular the problems on the A36.</p> <p>An experiment by Harnham Neighbourhood Association a few years ago, reported in the Salisbury Journal, showed that just two dozen extra cars driving along Netherhampton Road, through Harnham Gyratory, down to the Exeter Street roundabout and back again four or five times at 8.30 one Tuesday morning could cause chaos, with tailbacks from the roundabout to the cattle market lasting for an hour and a half.</p> <p>A primary school designed to take in pupils from other parts of the city as well as the local area will add still further to the traffic using this route, whilst an employment site designed with the hope of enticing Churchfields businesses to move will, if successful, bring in hundreds of vans, lorries, transporters etc all day long, five days a week.</p> <p>Churchfields businesses have hitherto been unwilling to relocate, preferring to stay together on one site. If they do not take up the new employment site (and existing employment land alongside Netherhampton Road has remained vacant for many years), there will be obvious and irresistible pressure to use it instead for yet more housing, adding still further to the traffic chaos. If experience at Bishopdown is anything to go by, such housing, not masterplanned as part of the original development, would be at even higher density.</p> <p>I see that there are references to a total of 1,195 dwellings on the site in some of the supporting Atkins paperwork. Is this more realistically what we can expect?</p>				

	<p>Either way, thousands of extra vehicles will be using a relatively narrow residential road, which is incapable of being widened. Householders will face constant jams, noise and fumes. Air quality will be appalling.</p> <p>Yet all that is proposed to solve this is an unspecified 'refresh' of a strategy which has hitherto spectacularly failed to solve the city's transport problems.</p> <p>This site is a long walk away from the city centre. There is no way that a redesign of the Gyrratory, a couple of foot/cycle paths and a couple of extra buses a day will reduce traffic to an acceptable level.</p> <p>Another proposed development site, at Britford Lane, was rightly rejected, in part because it would feed on to New Bridge Road, which is already deemed to be at capacity. Traffic from this site will do exactly the same thing.</p> <p>At the very least, the public should be consulted upon and allowed to see the updated transport strategy before any decision on this site's future is taken.</p> <p>And it needs to be considered in conjunction with the proposal to designate land for another 100 houses on the opposite site of the road, as there will be a cumulative effect.</p> <p>I note, too, the concerns expressed about potential impact on the River Avon SAC, with mitigation measures considered to be 'problematic'.</p> <p>Finally, I would like to say that this consultation will not be accessible to a large number of people who might wish to express an opinion. I have spoken to numerous residents who were unaware of the proposal or who do not understand the concept of 'soundness' when asked to comment. Further, the volume of documentation to scroll through online is deterring many.</p> <p>To date Wiltshire Council has organised only a one-day public exhibition about proposed development sites in and around Salisbury, which offered scant detail. Surely it should be the role of local councillors to at least notify people in their wards about something this important.</p> <p>Once something on this scale has been approved in principle it will be too late at planning application stage for the citizens of Salisbury to say it is too big, and in the wrong place, on the wrong side of the city from the A303.</p> <p>With no bypass in prospect, and no money to pay for one even if an environmentally acceptable route could be found, I would urge the council to reconsider.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The examination needs to take into account the views of local residents - if not myself, then others who may be better qualified. However, I would wish to be present, at least.</p>

Comment ID:	47	Consultee Mr Christopher Menheneott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118224	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We have been residents at this address for 21 years in which time we have been increasingly concerned at the way Trowbridge town centre has been going downhill, and at the increase in traffic on a road system that is just becoming totally inadequate for the population and often becomes grid-locked.</p> <p>Current planning proposals and sites identified in the Land Availability Assessment appear to ignore 2 fundamental facts: Availability and development of existing Brownfield sites in Trowbridge; Increase in infrastructure that would be required BEFORE planning is approved for more housing; Lack of employment for the anticipated increase in population; As the County town of Wiltshire the centre of Trowbridge sets a poor example of concerted development.</p> <p>- See attached list of points describing why proposed Plan is incomplete and unsound: (letter dated 28 July 2017)</p> <p>Summary:</p> <ul style="list-style-type: none"> - Requires visibility of proposals to develop road traffic system BEFORE approving housing plan. - Requires visibility of sites to be made available for industrial development - eg: new industrial estates. - Should insist on development of brown-field sites in Trowbridge: BEFORE green-field sites. <p>These should be added to the numerical proposal to offset requirement.</p> <ul style="list-style-type: none"> - Should demonstrate how sites proposed for use maintain the buffer zones between town and villages. - Should show where new schools are to be built or land allocated/reserved. - Should show where new retail outlets are proposed. <p>Without the above it is impossible to prove the soundness and legality of the proposals.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	48	Consultee Mr Christopher Menheneott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118224	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Brownfield sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Brownfield Sites:</p> <p>5. We feel that the Council should be insisting on development of existing sites in the town, before allowing houses to be built on green field areas, that inevitably leads to just absorbing the villages such as North Bradley, Southwick etc into the town. The green buffer areas should be maintained as a matter of Council policy.</p> <p>6. Former Bowyers site: as eloquently pointed out in the Wiltshire Times recently, this is a huge site where redevelopment could place housing in the centre of the town, close to transport links including the railway and would give a golden opportunity to improve facilities in the centre.</p> <p>a. This site could include the now abandoned garage showroom which is an eyesore;</p> <p>b. Developers should be incentivised by the Council to include the older buildings into their plans, even if they are listed. It is accepted that development costs may be higher being a legacy industrial site, however we feel there should be some government funds that could be found for the redevelopment of such sites. The Council could assist potential developers to access these. (It is noted that the 2 former Ushers brewery sites – also legacy industrial sites - were developed successfully);</p> <p>7. Other Brownfield sites: has the Council investigated whether other Companies in the town might be encouraged to move out of the town centre to one of the several industrial estates? This could improve access for such companies, would reduce heavy lorry traffic in the town, and provide a lot of housing where it is most needed. There are vacant spaces on industrial estates at White Horse and the new one at Hawke Ridge. There does not appear to be any statement in the Plan that explains how availability of land for housing has been judged ;</p> <p>8. Former Council offices site on Bradley Road: this has remained empty for a long time – as an existing Brownfield site it should be a preferred development, yet it is not mentioned in the SHLAA so presumably is not included in the figures. It is understood from a Council officer on 26 July, that “planning approval for housing on this site is now delayed”. This development should feature in the plan thereby reducing the total housing required by the number of proposed dwellings ;</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	49	Consultee Mr Christopher Menheneott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118224		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge buffer zones		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Buffer Zones</p> <p>9. It is appreciated that there is no law protecting green spaces and the countryside except the formal Green Belt. However, there is a strong determination from residents in the villages outside Trowbridge to maintain the green buffer areas. These are important to people for recreation, for walking and for exercising dogs and horses, to families so that children can learn about the countryside and enjoy it. Also the green spaces between villages and town are an essential contrast to the busy urban life and mean that people do not have to get into their cars and drive to relax in the countryside.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	50	Consultee Mr Christopher Menheneott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118224		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge SHLAA sites assessed			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Planning proposals</p> <p>10. 3247 + 257 + 259 + 260: these sites appear to equal potential for some 2,800 homes. All these will inevitably add to pressure on roads, require more places in schools (existing schools are already over-capacity), and will require more shops and more jobs.</p> <p>11. 3565 Southwick Court AND 298 Woodmarsh: both these, especially the Woodmarsh proposal, would be a cynical further destruction of the buffer between villages and the town. It would also add considerably to the traffic trying to use the main Bradley Road into Trowbridge – this road is already impossibly congested at peak times by traffic to and from the White Horse Business Park, into the Spitfire Park shopping area, and down to the centre of the town.</p> <p>a. 298 Woodmarsh: it became apparent at the Consultation on 26 July that maybe not all landowners have given permission for development of their land. This site should be rejected also in order to preserve the separate identity of North Bradley.;</p> <p>b. It is understood that plans have already been approved for former office sites in the Business Park (Virgin and Vodafone) to be converted to housing – 140 homes. This does not feature in the SHLAA figures and plan which would reduce the total required ;</p> <p>c. 261, 252, 256, 292: a Council officer has said that these sites have been rejected as “not to be considered further” for housing. However, when asked where the new Secondary School will be built, we were told that it will be on one of these sites, previously rejected because they are in a flood plain area. If true, this illustrates that the Council is not being open about the complete development plan. It is also understood that there is to be another industrial estate in this area;</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	51	Consultee Mr Christopher Menheneott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118224		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge transport concerns		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>12. Traffic:</p> <p>a. There does not appear to be any plan for the development of road transport to support</p> <p>b. There is a very urgent need for a proper bypass to take traffic approaching Yarnbrook from the east along the A350, out past the White Horse Industrial Estate, bypassing Westbury and further west to gain access to the A36. This would enable traffic to travel north and south on the A36, and west to the A303 and M5.</p> <p>c. By adding more housing, and another industrial estate, at Ashton Park the traffic will be increased considerably on all routes. This will all increase the weight of traffic and congestion at choke points such as Yarnbrook (even on the new proposed roundabout), at the Rising Sun roundabout and through North Bradley, and on the narrow Wynsome Street through Southwick.</p> <p>d. The heavy weight of traffic, especially HGV lorries, transiting on the minor roads through Yarnbrook, North Bradley and Southwick, has already made these roads extremely dangerous. For instance, at peak times it is almost impossible to turn safely out of The Rank and other local roads. The centre white lines have been removed which allows vehicles to stray across the road, and the road and pavements are simply not wide enough for the traffic and pedestrians including families and children gaining access to schools. Watch the HGV lorries trying to pass within inches of each other in the centre of these villages.</p> <p>e. There are virtually no shops in out-of-town villages, so more housing in the proposed sites can only increase use of vehicles, exacerbate the existing problems and make the roads UNSAFE.</p> <p>f. New primary schools and doctors surgeries will be required urgently.</p> <p>g. Finally, the Council should appreciate that the only recycling centre for Trowbridge is on Canal Road. This requires everyone to use their cars, a great proportion of the population need to travel through the town to reach the Tip – this increases traffic and pollution even further.</p> <p>At the Consultation on 26 July the public were given no visibility of a transport plan to support proposed developments, nor was there any visibility of industrial development. Is there any such transport plan?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	52	Consultee Mr Christopher Menheneott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118224		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Principal Settlement		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The SHLAA talks about Trowbridge being a “Principal Settlement” and primary focus for development. There is no mention of how “The role of the town as a significant employment and strategic services centre” is actually to be achieved.</p> <p>It would appear that contrary to Council policy and legal requirement, maybe not all landowners have been consulted on inclusion of their land in the SHLAA.</p> <p>Existing infrastructure facilities in this town are already stretched: the proposed housing will inevitably bring more traffic into an already congested centre. At the same time existing sites in the town, where people could walk to the shops, surgeries etc, and catch the trains for work in Bristol, Bath, Warminster and Salisbury etc, would seem to be available and yet are ignored by the Council in their town plan.</p> <p>The Trowbridge Community Area Strategy – part of the Wiltshire Core Strategy – describes lots of plans and proposals, but does not appear to say anything about infrastructure development apart from one secondary school, and there is no mention of developing the road network.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	53	Consultee Ms Megan Hughes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118606	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to protest about the proposed building of houses on fields in and around Trowbridge.</p> <p>I am not against houses being built, particularly affordable housing, however to build on these meadows which will encroach or envelope the surrounding villages will create urban sprawl, which I am very much against.</p> <p>The houses in my opinion, should be built on brown field sites within Trowbridge itself. There are several acres of such sites many of which have already been cleared and levelled. This will help regenerate the town which is in decline and has been ranked the fifth worst in the South West. Deplorable for a county town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	54	Consultee Mr Paul Elphick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118631	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Trowbridge has provided more than its fair share in meeting the demands placed upon Wiltshire by the government directive to provide more housing. Why are the council not providing more vigour to pursue the development and building on the approved brown sites that have lain dormant for so long? These must surely take precedence over farm land that is still in daily use.</p> <p>That Wiltshire cabinet members are so eager to sacrifice these beautiful and productive fields to the south of the boundary brook and turn their Core Strategy on its head, is nothing short of scandalous. The allocation should be shared more fairly with surrounding towns and in particular Chippenham, as at present, it is biased against Trowbridge. It is interesting to note, is it not, that none of the cabinet members reside in Trowbridge!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	55	Consultee Dr Mike Lawrence Christian Malford Parish Council	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1118671	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Settlement Boundary Review			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Draft Wiltshire Housing Sites Allocations Plan relies heavily on information in the Chippenham Community Area Remainder Topic Paper. Which includes the following statements:</p> <p>Page 7 states that Christian Malford NDP 'is not reviewing the current settlement boundaries'. This is untrue (see the submitted NDP which includes a review of the settlement boundaries.)</p> <p>Page 8 states: "No settlements in the Chippenham Community Area Remainder are considered to have had their settlement boundaries reviewed through a sufficiently advanced neighbourhood planning process. Therefore, all settlements with currently adopted settlement boundaries within this community area have been considered through the settlement boundary review."</p> <p>This is untrue and in contradiction to the statement on Page 12:</p> <p>Page 12 states that Christian Malford will not be taken forward to the next stage of assessment of site allocations because it has "Advanced neighbourhood plan allocating approximately 38 dwellings." This statement is in apparent contradiction to the statement made on Page 19:</p> <p>Page 19 states that "No settlements in the Chippenham Community Area Remainder are considered to have had their settlement boundaries reviewed through a sufficiently advanced neighbourhood planning process.</p> <p>Therefore, all settlements with currently adopted settlement boundaries within this community area have been considered through the settlement boundary review."</p> <p>The submitted Neighbourhood Plan states (page 38):</p> <p>Christian Malford is identified as a Large Village in Wiltshire Core Strategy Policies 1 and 10. Core Policy 2 says within the limits of development, as defined on the policies map, there is a presumption in favour of sustainable development at the Large Villages. It also says that</p> <p>"Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans"</p>				

	<p>In order to ensure that proposals coming forward on those sites are in accordance with Core Strategy Core Policy 2, the settlement boundary had been amended to include the new sites. The revised settlement boundary is shown In Map 10."</p> <p>(my emphasis)</p> <p>(please see attached original rep with table)</p> <p>The Plan does not take into account the very advanced state of the Christian Malford Neighbourhood Plan, which was put out for public consultation between 5th June and 18th July, at which point it will be passed to an independent examiner. It should more properly not have been put forward for boundary review, much is the same way as other villages such as Great Somerford have been excluded. Further to this, it should be noted that the revised boundaries included in the Christian Malford Neighbourhood plan were approved by Economic Development and Planning, and it is incomprehensible why this revised boundary was not therefore acknowledged in the Wiltshire Housing Site Allocations Plan</p> <p>Proposed changes are therefore: Page 24: Chippenham section. REMOVE Christian Malford from the left-hand column, and include Christian Malford into the right-hand column Page 108 Paragraph A.34: Remove Christian Malford Map of Christian Malford immediately following Page 108 : Remove</p>
Attached files (Please see Objective)	4671959
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I believe that I should participate in order to ensure that my concerns are fully heard and understood.

Comment ID:	56	Consultee Mr Paul Elphick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118631	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6; Table 5.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Though it will cut no ice with respect to planning consent or refusal, the proposed land for development is a picture perfect setting outlined by trees along the brook boundary with expansive views of the Westbury hills and White Horse to the south. This land provides a recreational area for walkers of all age groups, many of whom pass our house to cross the stile nearby. The well trodden paths are testament to its use by so many, who like ourselves walk the various footpaths with children and grandchildren, often to neighbouring villages. Quality of life that includes exercise, is beneficial, lifts the spirit and imbues one with a sense of wellbeing, but these values, clearly count for nothing among those cabinet members eager to concrete over an area so valued by the community. Wiltshire council must work on behalf and for all residents in a more robust manner to preserve our green fields and not against us to our detriment.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	57	Consultee Mr Paul Elphick	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118631		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6; Table 5.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Appendix G, Assessment criteria and output from stage 4a of site selection process (page 27.) states: Site 3565 - Southwark Court - Accessibility - "Potential vehicle, pedestrian & cycling routes through existing routes to the immediate north on to Silver Street Lane". If it is the intention of planners for vehicular traffic to access Silver Street Lane from the proposed development via either Balmoral or Sandringham Road, then those planners must be made aware of the folly of making our quiet cul-de-sacs into 30mph drive-throughs. It becomes very cluttered at the lower end of Sandringham Road, with various home improvement and service vehicles, to add to the overflow street parking. Each of the 180 proposed upmarket homes will have, maybe 3 cars per household. If each vehicle is driven twice a day, then this equates to 2,160 extra vehicles plus delivery vans and so on, that will be speeding up and down our once peaceful cul-de-sac. This must not happen and we will fight tooth and nail, any proposal that leaves us disadvantaged. Access to College Road and Silver Street Lane is off the Frome Road. So should Wiltshire council bulldoze this unnecessary development through, council members and planners should give serious consideration to access the proposed development at the eastern end where it would adjoin the Frome Road close to Firs Hollow between Trowbridge and Southwick. This would alleviate congestion at the end of Silver Street Lane which is already a nightmare at peak times. This will enable commuters to travel through Southwick to Bath or Bristol where many will work, without adding further to the congestion in Trowbridge.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	58	Consultee Mr Paul Elphick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118631	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6; Table 5.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Under appendix G, the attached map shows a red line to outline the proposed revised Trowbridge boundary. It would appear that you are handing over to Southwick the two recreational areas at Silver Meadows and Sandringham Road, or worse still, to the developers. Is this a disingenuous move by the council to sanction erosion or destruction of these valued spaces for commercial interests? If not, why will these areas not remain within the Trowbridge boundary?</p> <p>Our house, 28 Sandringham Road is in between the two recreational areas and is the only property that directly borders the brook. I am concerned that our garden and house will be overlooked by the proposed housing and that the developers will have free rein to remove the line of trees (for whatever fabricated reason they dream up) and even the brook itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	59	Consultee Mr & Mrs David and Brenda Alsop	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118762	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	When we moved to this lovely quiet bungalow we were told it was unlikely any building would take place on the fields as it was agriculture land. The natural hedgerows are full of wildlife and many varieties of birds also lovely old trees and wild flowers. Fields are well used by walkers and dog walkers as there is very little of this type of area around here it is very valued. We are concious of how close to North Bradley and Southwick any building would take us so we would lose our boundaries if we are not careful. We are near to losing our natural hedges as well as the well established trees and there must be other land to build upon where this would not happen. Please consider this protest bearing in mind the number of senior citizens who appreciate being able to walk in the field and admire the beauty without inhaling so many fumes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	60	Consultee Mr Barry Wilkins	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1118793		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Para 5.1`27 - 5.138		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan for the development in Harnham is dependent upon a major review of the road network to accommodate the increased traffic. It is difficult if not impossible to see where these road improvements could be made. It is putting the cart before the horse. Details of the plans for the road network need to be put alongside the proposed housing plans so that it is then possible to make a judgement. At the moment it is impossible to see how the road network can be improved to accommodate the increased traffic. The Harnham Road is already gridlocked at peak times. This will only exacerbate the situation especially as most houses have at least two cars. This will cause increased problems in entering the City. If the cars have to then have to get to the Southampton Road this will cause absolute chaos to an already chaotic road network. Whoever drew up the plans appears to have no knowledge of the area. It would seem that because Churchfields is proving difficult to implement you have opted for Harnham without thinking through the consequences.</p> <p>Despite your reassurances the increased number of cars is bound to cause an increase in pollution. Traffic queues will only make this worse. I also have concerns about the ability of the area to cope with the increased drainage that will be needed especially the impact of surface water on the Netherhampton Road.</p> <p>All of the above problems could be avoided by the building of a new market town in the north of the county. This would not only resolve the problems with the development in Salisbury but would also satisfy the Council's requirement to build a number of new homes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	61	Consultee Mr Julian Barry	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119042	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Oaksey Settlement Boundary Review			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to object to the settlement boundary changes at Oaksey.</p> <p>My objections are as follows:</p> <ol style="list-style-type: none"> 1. The house, gardens and outbuildings of Woodfolds Farm, The Green, Oaksey have been included in the settlement boundary, and yet Greenacres Farm including redundant farm buildings has not, yet the latter is closer to the main populous of the village. 2. Woodfolds is a listed site - so any additional inclusion in the settlement boundary and likely development - would be difficult to attain due to this status. 3. Planning Officers have previously supported residential development at Greenacres Farm (yard) and affordable housing close to Bendy Bow in the field area. 4. The proposed site at Wick Road for 11 houses has a road that is generally narrower than The Green and is within proximity of a conservation area. Greenacres Farm is not in a conservation area. 5. I understand plans are at an initial stage to redevelop part of the Bendy Bow estate. It would make sense the field area at Greenacres Farm is included within this scope or additionally to the activity. The field at Greenacres Farm and the Bendy Bow estate were one of the same prior to the latter being built. <p>In summary, I would like to see:</p> <ol style="list-style-type: none"> a) The redundant farm buildings at Greenacres Farm (as shown in the attached) within the scope of the settlement boundary, and subsequent residential development allowed. b) The field area between Bendy Bow and the farm buildings in (a) above to be allocated for housing/affordable housing. <p>Please see attached site information. If you require further clarity please contact me.</p>				
Attached files (Please see Objective)	4673007				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	62	Consultee Mr Simon Fisher Deputy Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Devizes Town Council Person ID: 838183		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Devizes Community Area Remainder			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Responses from Devizes Town Council At a recent meeting of the Town Council, the Wiltshire Housing Site Allocation Plan for the Devizes Area was considered. The Council also considered the comments made by the Devizes Area Neighbourhood Plan Steering Group and unanimously endorsed their conclusions which are: <ul style="list-style-type: none"> It agrees that the plan was correct in not identifying further sites in the town, as there is sufficient development commitment to meet the remainder of homes needed for the plan period. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	63	Consultee Mr Simon Fisher Deputy Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Devizes Town Council Person ID: 838183		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Settlement Boundary for Devizes			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Responses from Devizes Town Council At a recent meeting of the Town Council, the Wiltshire Housing Site Allocation Plan for the Devizes Area was considered. The Council also considered the comments made by the Devizes Area Neighbourhood Plan Steering Group and unanimously endorsed their conclusions which are: <ul style="list-style-type: none"> The change to the Settlement Framework Boundary was justified as it corrected a slight anomaly. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	64	Consultee Mr Simon Fisher The Devizes Area Neighbourhood Plan Steering Group	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119082		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Devizes Community Area Remainder			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Responses for The Devizes Area Neighbourhood Plan Steering Group Having considered the document, the DANP make the following two comments: <ul style="list-style-type: none"> It agrees that the plan was correct in not identifying further sites in the town, as there is sufficient development commitment to meet the remainder of homes needed for the plan period 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	65	Consultee Mr Simon Fisher The Devizes Area Neighbourhood Plan Steering Group	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119082		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Settlement Boundary for Devizes			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Reponses for The Devizes Area Neighbourhood Plan Steering Group Having considered the document, the DANP make the following two comments: <ul style="list-style-type: none"> The change to the Settlement Framework Boundary was justified as it corrected a slight anomaly. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	66	Consultee Mr Richard Greenwood	Agent Richard Greenwood Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1119095	Benchmark Development Planning Ltd Person ID: 894742	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Draft WHSAP fails to identify sufficient land to meet the 5 Year Supply of Housing land. To comply with the need for housing the WHSAP should allocate more suitable, available and viable land, including land adjacent to H3.5 known as Site S98 at Hackthorne / Durrington Manor (see Plan 1).</p> <p>Land to the rear of the Vets at Larkhill Road, Durrington should be added to Site H3.6 (see Plan 2). Representations by land owners of part of Site H3.5 (the S98 part) and all of Site H3.6 at Durrington Pre-submission draft Wiltshire Housing Site Allocations Plan (WHSAP) This is an objection to the draft WHSAP and we would be grateful if you could acknowledge safe receipt of this email and provide us with an Objector reference number, by return. We are likely to write again with a full objection and we will cross-reference with the same objector reference number (to avoid confusion). Briefly, our objection is that:</p> <ol style="list-style-type: none"> 1. All of S98 at Hackthorne / Clover Lane should be allocated for housing to meet local housing need and provide adequate land for the 5 years housing land supply to 2026. 2. Part of the land to the rear of Vets at Durrington should be included with Site H3.6 (see title plan). 3. Our detailed objections (to follow) will include information on the suitability, availability and viability of our objections (for sites H3.5 and H3.6) and set out why the draft WHSAP is not sound currently but would be, if amendments are accepted and included within the WHSAP, and all relevant planning matters. <p>Before the draft WHSAP was issued we did request by email and 'phone a meeting with Officers, but alas no offer of a meeting was made by Officers. We also submitted a Statement (enc) dated 14/06/17 to Wiltshire Council for the Cabinet meeting on 20/06/17. We attended that Cabinet meeting and our Statement was referred to, but not discussed as it was not the purpose of the meeting to discuss individual sites. We are currently reading through the draft WHSAP and consider that there are matters we would like to discuss with Officers at a face to face meeting well before the deadline of Friday 22nd September, so we can better understand Officers' thinking behind the proposed allocations. We are happy to either meet you at your office in Trowbridge or on site, to suit you.</p> <p>By allocating further land the WHSAP will be more likely to meet the 5 Years Housing Supply for the Amesbury Community Area to the end of the period (2026) and housing need generally in this area during the Plan period.</p>				

	<p>Further more detailed objections will be submitted before the deadline of 5pm on Friday 22nd September 2017.</p> <p>3 attachments:</p> <ol style="list-style-type: none">1. 1119095 Rep 66 Objection form Land at Durrington 3.5 and 3.6 submitted 08.08.172. 1119095 Rep 66 STATEMENT ON BEHALF OF LANDOWNERS (14.06.17) re Wilts Housing Site Plan3. 1119095 Rep 66 Stonehenge Veterinary Car Park Area20170504_10575228
Attached files (Please see Objective)	4673209 / 4673210 / 4673211
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To explain to the Inspector the merits of this objection and to examine in public the Authority's case, as presented to the Examination (assuming the Authority do not accept our objections and modify the WHSAP).

Comment ID:	67	Consultee Councillor Richard Gamble Person ID: 402716	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		West Lavington and Littleton Pannell Settlement Boundary Review			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Please see original representation for full details (plans, etc.) The proposed settlement boundary changes to West Lavington and Littleton Pannell appear to include a number of anomalies and errors. 1. Area behind 67-69 High Street, West Lavington SN10 4JB and adjacent properties It is proposed that an area currently within the boundary should be excluded, as shown below: Only one part of this area, at the northern end, may be described as comprising “a farm building and farm yard at the edge of a large village”. The remainder comprises domestic buildings or gardens. Structures are clearly shown on the map below, with the only agricultural building shown by the arrow. The large building at the south is West Lavington Manor. The built form of the area is also clearly shown in the aerial photo below: I believe it is incorrect to exclude West Lavington Manor and incorrect to divide the rear garden of 67-69 High Street. 2. Area behind 109 High Street, Littleton Pannell It is proposed that an area currently within the boundary should be excluded, as shown below: I assume that the exclusion is proposed on the assumption that the area comprises “The extended curtilage of a property that relates more closely to the open countryside (e.g. a field or a paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale or location”. I surmise that the assessment had regard to the map below, in which the area appears to be a field: In fact, the greater part of this area is an extensive rustic garden associated with 109 High Street. It is divided into several sections where the owners have generously hosted numerous community events. It is not agricultural in any way, nor does it relate to the open countryside. The map is misleading in that respect. The section highlighted here is part of the garden of 115 High Street The character of the area is better illustrated by the aerial photo below: In summary, the area does not relate more closely to the open countryside, nor does it extend the built form of the settlement as it is within the line of the former burgage plots which form the existing settlement boundary in this area. It is, however, “The curtilage of a property that relates more closely to the built environment (e.g. a garden)” and “has limited capacity to extend the built form of the settlement in terms of scale and location”. In my view, it is anomalous to exclude this area. 3. Area of High Street, Littleton Pannell SN10 4ES It is proposed to amend the boundary to exclude the highway A360 and adjacent lanes as shown below: This amendment has no basis on any of the defined criteria and appears bizarre. 4. The village playing field adjacent to Sandfield SN10 4HL It is proposed to amend the boundaries adjacent to the village playing field as illustrated below:				

	<p>These amendments have no basis on any of the defined criteria. Given that the playing field is bounded on the north by houses, on the east by the primary school, on the west by the village hall and on part of the south by sheltered housing, it would be more logical to include the field on the basis that it is "Recreational or amenity space at the edge of a settlement that relates more closely to the built environment".</p> <p>5. New Pavilion at Dauntsey's School The extension of the settlement boundary at Dauntsey's School includes Evans House but does not include the newly built Pavilion. The Pavilion is not shown on the Wiltshire Council maps used above, nor on satellite images, but is outlined on the SBR map below: I believe this building should be included within the new boundary to comply with the criteria, which states "Built and commenced residential and community facilities development such as religious buildings, schools and community halls, that is physically related to the settlement". I suggest the settlement boundary proposals should be amended to reflect all the points above. I am copying this to the Chairman and the Clerk of West Lavington Parish Council. Please do not hesitate to contact me if you wish to discuss any matters. I will be writing separately in due course about the proposed Housing Site Allocations in Market Lavington.</p> <p>From email 19/09/17: I refer to the response of Worton Parish Council to the Settlement Boundary Review (as outlined in the attached document) and wish to record my support for their request for no change to the existing boundary without direct consultation and consideration. The existing boundary is long established and reflects in many respects the historic settlement as defined by burgage plots etc. In addition, many of the proposed changes fail to accurately reflect the criteria defined in the settlement boundary review methodology document. For example, the school grounds (G6) and gardens (H6, I6 and J6) are certainly not "more related to the open countryside". It would appear that the compiler was unfamiliar with the location and may not even have examined the aerial photography. Worton is in the process of preparing a Neighbourhood Plan and I have no doubt that responsible proposals will be made regarding the settlement boundary in due course if that is appropriate.</p>
Attached files (Please see Objective)	4673168
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	68	Consultee Mrs Joanne Algar	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119110	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>I understand there is a proposal for building on the fields adjacent to Boundary Walk which is just a few metres from my house. I am appalled at this proposal, obviously I am concerned how this is going to affect myself and my family. My other concern is for the detrimental effect this will have on the wildlife:Deer, squirrels, bats all the different species of birds to name but a few.I understand there are other areas in Trowbridge where planning permission has already been passed. I know you have a target to reach so surely these areas could be used instead.It would be good to know that a rich property developer waving cash can't get what it wants</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	69	Consultee Mr E Hawksworth	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446039		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With ref to the Netherhampton Road part of the plan i.e. S1027 and S1028. My concerns are: The anticipated increase in traffic on the A3094, which is in effect the fourth bypass for Salisbury The greater hindrance to the passage for ambulances to and from the SDH serving as it does the whole of South Wiltshire The possible approval to the plan before the transport/highways difficulties are resolved The use of a “promise” of a plan as a “fob”</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	70	Consultee Mr E Hawksworth	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446039		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With ref to the Netherhampton Road part of the plan i.e. S1027 and S1028. My concerns are: The anticipated increase in traffic on the A3094, which is in effect the fourth bypass for Salisbury The greater hindrance to the passage for ambulances to and from the SDH serving as it does the whole of South Wiltshire The possible approval to the plan before the transport/highways difficulties are resolved The use of a “promise” of a plan as a “fob”</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	71	Consultee Ms Anna Humpston	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119160		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Whitley Settlement Boundary Review			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I live in the large village of Whitley and have been made aware that the settlement boundaries are up for review. I would like to make a representation to see if a portion of the patch of land highlighted on the attached sketch I amended, could be discussed for inclusion in this revision to the boundary? The site is surrounded by built environment on all sides and Whitley golf club entrance to the south very much forms the boundary edge of the village.				
Attached files (Please see Objective)	4673319				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	72	Consultee D M Green	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119171		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Having lived at the above address for the past 47 yrs looking out onto the fields I wish to oppose the proposal to build. There is no-end of brown land which could tidy up Trowbridge. Over the years I have seen not only (dog walkers) but wellbeing for all ages which became important to every-one, especially elderly on their own who would walk in the field to (talk to some-body) I could mention quite a few. All this will be an impact on their mental health.</p> <p>The other issue is the wildlife. I have seen five deer, 3 foxes early mornings, hedgehogs, newts, bats, newts squirrels all this would have a terrible impact on their habitat, so I strongly ask you to put forward these points and to understand what this will do to us all.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	73	Consultee Ms Gillian Bonner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119180		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1) Traffic chaos At peak times it already takes up to 30 minutes to travel around the Harnham Gytratory. The building of such a large number of houses off Netherhampton Road will inevitably bring chaos in both directions and also delay emergency service response times.</p> <p>2) Effects on the environment, particularly for development proposed for Netherhampton Road (North) The area proposed for development is crucial for flood defence and the building of houses would therefore have a devastating impact on the surrounding environment, both wildlife and human habitat. Following consultation planning has already been rejected below Harnham Bridge. The same concerns would apply to this current proposal. If flood plains are built on, the flood defences would be unable to cope. In 2013 - 14 they were already close to bursting and the proposed site was deeply covered in water for several weeks. It is alarming and a cause of concern that the proposal has got this far, and amounts to an extreme waste of public money. Who will be held to account?</p> <p>3) Affordable housing How will this be managed? Whilst there is no doubt that affordable housing is much needed, it must be managed transparently and fairly to give real opportunities to local families, and all the infrastructure to support it must be in place at an early stage. There will be areas much more suitable for development that are not near to valuable water courses.</p> <p>4) Impact on services. Infrastructure affected by large population increases extends to all current Health, Education and Social Care Services. Despite all the housing developments already underway there has been no extra funding available to Services which continue to have cost savings imposed year on year.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	74	Consultee Ms Gillian Bonner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119180	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1) Traffic chaos At peak times it already takes up to 30 minutes to travel around the Harnham Gytratory. The building of such a large number of houses off Netherhampton Road will inevitably bring chaos in both directions and also delay emergency service response times.</p> <p>2) Effects on the environment, particularly for development proposed for Netherhampton Road (North) The area proposed for development is crucial for flood defence and the building of houses would therefore have a devastating impact on the surrounding environment, both wildlife and human habitat. Following consultation planning has already been rejected below Harnham Bridge. The same concerns would apply to this current proposal. If flood plains are built on, the flood defences would be unable to cope. In 2013 - 14 they were already close to bursting and the proposed site was deeply covered in water for several weeks. It is alarming and a cause of concern that the proposal has got this far, and amounts to an extreme waste of public money. Who will be held to account?</p> <p>3) Affordable housing How will this be managed? Whilst there is no doubt that affordable housing is much needed, it must be managed transparently and fairly to give real opportunities to local families, and all the infrastructure to support it must be in place at an early stage. There will be areas much more suitable for development that are not near to valuable water courses.</p> <p>4) Impact on services. Infrastructure affected by large population increases extends to all current Health, Education and Social Care Services. Despite all the housing developments already underway there has been no extra funding available to Services which continue to have cost savings imposed year on year.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	75	Consultee Mrs Lyn Close	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119264		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write to object to the planning application to building houses on Boundary Walk with the following reasons</p> <p>Poor access routes (Frome Rd. is very busy, and via the Bradley Gardens Estate is also less than ideal)</p> <p>Inadequate local services (primary schools, doctors, dentists etc.)</p> <p>Increased traffic on the estate</p> <p>Loss of green space, which removes communal green spaces from all residents of Trowbridge and surrounding areas</p> <p>Death of surrounding villages, including North Bradley and Southwick</p> <p>Existing brownfield spaces</p> <p>Also the loss of mature trees and hedges with subsequent loss of a large amount of wild life</p> <p>The bottom of the field is a high risk of flooding as it does every year.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	76	Consultee Mr David Lacey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106181	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Tisbury Settlement Boundary Review			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I should be most grateful if you would consider amending the boundary (hatched line)at Ref F8 on the plan .There is now a fence from the north west corner of my property which crosses the paddock and is in line with the gardens of Springfield estate immediately to the south of my property and this ,to me, would seem a more logical line for the boundary. If you should have any queries concerning this proposed alteration, or wish to make a site visit please let me know.				
Attached files (Please see Objective)	4673334				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	77	Consultee RD and S Robson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119213	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure A.5 West Lavington and Littleton Panell settlement boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We would like to inform you that you you have incorrectly indicated our boundary on your plans/map. Our garden extends to the rear to the boundary with the field owned by Mr Coxhead on one side and a house on the other side. Also you appear to have consumed part of our neighbors garden at 115, we have informed them also of this mistake. We are very concerned that had we not noticed this error, this incorrect map could have been used for any further planning purposes. We must assume that whoever was responsible for this cannot have researched any existing maps. Would you please inform us when this is corrected?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	78	Consultee Mr & Mrs Ralph and Leila Butcher	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119270	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Hilperton Gap / Elizabeth Way Figure 5.7 H 2.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Greenfield development in Trowbridge.</p> <p>We should like to pass comment on the proposed use of greenfield sites for housing development, in particular land within the so-called 'Hilperton Gap'. It would seem that further reduction in our countryside is proposed without giving priority to brownfield sites. The road across Hilperton Gap was constructed despite strong opposition and to the detriment of countryside amenity. We understand that the land adjacent to Elizabeth Way and Trowbridge is under threat of housing development, which was contrary (and still is) to the wishes of the Gap Road opposition. We strongly object to this further attack on green land and public amenity space.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	79	Consultee Ms Rosie Evitt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119276	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my objection to the proposed property development of sites 298 and 3565 for the following reasons:-</p> <ul style="list-style-type: none"> • We already have huge traffic congestion in this area and the roads cannot cope with the current traffic load. • Infrastructure cannot support the population as it currently stands, never mind 900 more homes. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	80	Consultee Ms Rosie Evitt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119276	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H.2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my objection to the proposed property development of sites 298 and 3565 for the following reasons:-</p> <ul style="list-style-type: none"> • We already have huge traffic congestion in this area and the roads cannot cope with the current traffic load. • Infrastructure cannot support the population as it currently stands, never mind 900 more homes. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	81	Consultee Miss Caroline Light	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1113687		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road housing developments		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I feel the housing development is unsound due to the traffic density and increase in potential volume of traffic along Netherhampton road. At rush hour the roads are unbearable and around the Harham triangle junction, it is not unusual for traffic to be backed up to the One Stop convenience store, about 1 mile in length. Traffic can not move now, but by adding another potential 1000 cars to the area would destroy the area. The roads just cannot cope now, nevermind with an extra 1000 cars. The plan also gives no details of shops to the plan or health services, the area copes now, but with 700 + houses extra local services can not cope. This side of Salisbury has no shopping facilities there is no supermarket, just one small shop, how is this sustainable for the people in Harham, you offer schools but no services for food and medical provisions for all the people in Harham. How can a housing plan be developed with no plan for food, medical or the road infrastructure.</p> <p>i also have concerns about the land north of Netherhampton Road, is this flood plain land ? If it is flood plain land, that is just irresponsible planning, if fact it is no planning. The worlds climate is heating up = more rain = more flooding, do you Wiltshire Council even care about people's homes being built on flood plains ? From the plans no you do not.</p> <p>You should be building on brown sites, no green field sites, yes it might be more expensive for developers, it's called urban regeneration, not destroying our precious countryside.</p> <p>if houses are to be built, then proper services for a supermarket and petrol station, medical services, parking and need to be provided. The plan is for far to many houses 700+ houses is far to many and on green on green field sites. The Booker site has had no other building on it since I have lived here (5 years), empty land with nothing on it for years. We should be keeping our green belt not building on it, a maximum of 300 houses should be built on Netherhampton Road. The plans are irresponsible and greedy.</p> <p>a maximum housing of 300 houses around Netherhampton Road, not building on flood plains, a supermarket and medical services. I have no children, so you offer nothing to people like me, hard working professional people who own their own home, you offer the bare minimum and schools only. What irresponsible council offer building housing on green fields with no thought of infrastructure for roads, traffic, food/shops and medical services.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	82	Consultee Mrs S C Bradford	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119288	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>HOUSING DEVELOPMENT ON GREEN FIELDS SITE AT END OF BALMORAL ROAD</p> <p>As you see I live in Hazel Grove. I have a number of friends who live in Balmoral Road. My attention has been drawn to the proposed building of quite a large number of houses on the green fields beyond Balmoral Road and outwards towards Southwick. Many people use these fields to walk their dogs. I watch them as they proceed along Hazel Grove and down Balmoral Road to the fields. Such facilities are important to the people who live in this area.</p> <p>I wish to register my objection to such a development. There are a number of 'brownfield' sites in Trowbridge which could be used to accommodate more houses without using land such as this. It amounts to urban sprawl linking Trowbridge to Southwick.</p> <p>What provisions will be made for extra schools and other necessary facilities? Grove School is already causing parking problems in Hazel Grove. If access is allowed through Balmoral Road to Silver Street Lane this would cause even more problems. Why here?</p> <p>Please register this letter as a strong objection to granting planning permission for the building of a large number of homes in the area specified above. (GREEN FIELDS near Balmoral Road).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	83	Consultee Ms Heather Sheeley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106218		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		South Wilts Housing Market Area Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is not consistent with previous use of high grade farmland. The combined allocation is massive and would dominate the local community. Massive increase in traffic on a busy route for lorries, commercial vehicles and local circulation to schools, and routes around city. Little options for pedestrian routes to the city, train station and centres of employment. Local school and nurseries already over subscribed. Lack of any local infrastructure, employment, within walking distances or bus routes Loss of visual quality of views of the Cathedral and city from Harnham slope. Impact on local drainage and water capacity. Severely reduce the number of houses, improve transport and alternative routes for existing traffic. Consult in a more effective way, one day in city notified a week of so before, nothing locally. Absence of supporting infrastructure and record of failure to deliver planning reserved matters and considerable burden on existing local community with no benefits. Revitalise Churchfield industrial relocation plan thus using brown sites before farmland and deal with chronic existing traffic and transport issues. South Wiltshire has taken a huge burden of housing mostly taken up by people from outside the county thus not addressing actual housing shortfall, creating dormitory city and chronic traffic jams.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	84	Consultee Mr A W Watts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119432	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing delivery strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re: The regional spatial strategy housing needs Housing needs between Trowbridge and Westbury I refer to my telephone call to you on the 21st July 2017. Please find enclosed a Land Registry survey map to identify the land at Hawkeridge for Title Number WT77067 (OS 1683). I would like you to put this forward to be added to the mix. The land is adjoining Hawkeridge village houses which consist of approximately 45 mixed properties i.e. houses, bungalows and council houses which are new and old. The land has all main services on site: Main sewer/water and electricity supply. Facilities nearby:- (1/2 mile approximately) Two trading estates for business and work including a night club namely Club Ice Two convenient stores one which has a Post Office and a petrol station/general stores The village also has a local pub and a Methodist Church/train station is nearby Hawkeridge Road B3097 Hawkeridge Road is controlled by traffic lights and speed restrictions the entrance/exit could be a 2 way system It has a good bus service with bus stops very close-by There are also public footpaths which can be used to reach the local amenities The village and surrounding areas is in very urgent need for low costs housing along with private houses to accommodate local families and the work force for the employees of the two Trading Estates. This site has also been put forward as to the district plan. There is also a brand new store to be opened in the future at the new Hawk Ridge Park which will be nearest to Hawkeridge village. Please add this to the agenda. See the attached for supporting documents (download pdf for link).</p>				
Attached files (Please see Objective)	4806100				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	85	Consultee Mrs Pam Pointer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 925022		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Land at Rowbarrow, Salisbury		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Plans to build on land at Rowbarrow H3.4 are unsound because: Infrastructure requirements cannot be met. Increased traffic would be a major problem for the Harnham gyratory which is already often gridlocked, as is the A338, the hospital road and Newbridge road. The parish of Harnham of which H3.4 would be a part is already over-developed from a village south of the river Avon, to an urban sprawl as a large and increasing suburb of Salisbury Pollution levels are already dangerously high in the roads around this area Green lungs are essential for good physical and mental health. Development on this land, a greenfield site used for recreation, would be detrimental Very important – building on H3.4 would contravene the 40’ building line with regard to the cathedral The site is full of sky larks and wild flowers and with stunning views over many miles. Don’t wreck it! Withdraw the plan to build H3.4 as it contravenes the building line re the cathedral Recognise the traffic problems and build in other parts of the county. Expand Swindon instead Recognise the need to keep Salisbury and its rural environs as unspoilt as possible to maintain its medieval market town and cathedral town set in a rural landscape which will attract visitors.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	86	Consultee Mr and Mrs J Law	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119574		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We write with great concern about the proposal to build houses on the site named 'Southwick Court plus land at Church Lane. We feel that the well-being of so many people who use the relevant fields would be comprised. Are you aware of all the wildlife that exists in the areas in question? There are roe deer, bechstein bats (some of the rarest in the UK), badgers, foxes, squirrels and many native birds. Their habitats would be destroyed if these houses go ahead.</p> <p>We do not have enough Leisure facilities in Trowbridge for all the extra people and children that will settle in our area! We do not have a swimming pool that opens daily so that residents can swim any time of the day. We only have the pool at Clarendon School which is only open at certain times to the public.</p> <p>Children also need facilities like ten pin bowling etc.</p> <p>We have also been told that many trees and hedgerows have been established for over 100years which should be taken into consideration. Developers have Planning Permissions currently for over 5000 houses in Trowbridge. Why are these not being built to cover the Governments request that Wiltshire needs more houses? Do not let greedy developers take our precious green fields, which will eventually join the villages of North Bradley and Southwick to Trowbridge, for their own profits.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	87	Consultee Mr and Mrs J Law	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119574		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We write with great concern about the proposal to build houses on the site named 'Southwick Court plus land at Church Lane. We feel that the well-being of so many people who use the relevant fields would be comprised. Are you aware of all the wildlife that exists in the areas in question? There are roe deer, bechstein bats (some of the rarest in the UK), badgers, foxes, squirrels and many native birds. Their habitats would be destroyed if these houses go ahead.</p> <p>We do not have enough Leisure facilities in Trowbridge for all the extra people and children that will settle in our area! We do not have a swimming pool that opens daily so that residents can swim any time of the day. We only have the pool at Clarendon School which is only open at certain times to the public.</p> <p>Children also need facilities like ten pin bowling etc.</p> <p>We have also been told that many trees and hedgerows have been established for over 100years which should be taken into consideration. Developers have Planning Permissions currently for over 5000 houses in Trowbridge. Why are these not being built to cover the Governments request that Wiltshire needs more houses? Do not let greedy developers take our precious green fields, which will eventually join the villages of North Bradley and Southwick to Trowbridge, for their own profits.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	88	Consultee P R Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119601	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Proposed land for the Development of Houses at Southwick Court</p> <p>This letter remonstrates the proposed building of houses on the land north of Southwick Court and puts forwards a few issues which may arise should the construction of the houses proceed. The first problem presented here is the existing transport infrastructure. A road for the use of the new houses has been proposed to join Balmoral road, and therefore traffic from the new houses will use Silver Street Lane to travel to either Bradley Road or Frome Road. However Bradley Road is already a very heavily used road, as is Frome Road, whilst Silver Street Lane is becoming increasingly busy, Therefore any new traffic from Balmoral road, will lead to severe congestion of Bradley and Frome road respectively. A second problem that will evidently arise from new houses, is the need for new schools and the requisite parking for parents on the school run. The two primary schools likely to be used by new residents of the proposed houses are Southwick Primary and the Grove Primary school respectively; of which the latter school has already met its carrying capacity. Regarding the parking issue, there is a paucity of parking for parent's cars at the Grove Primary School such that the parents park their cars as far down as Silver Street Lane. This issue of the parking of cars by parents can only be exacerbated by the new traffic resulting from the new houses.</p> <p>Apart from the necessity for parents from the new houses to park their cars when collecting/dropping off their children to the Grove Primary School, there is the additionally problem of cars travelling along Silver Street Lane and having to negotiate a large number of these parents' cars, whilst simultaneously having to avoid traffic coming the opposite side of the road. This will quite possibly lead to much congestion and even accidents along Silver Street Lane.</p> <p>Another problem that will arise from the new houses is their close proximity to the solar farm in the field next to Knapp's Cottage. As new families and no doubt their adventurous children will move into some of the new houses, it is quite foreseeable that the solar farm will present a very real danger to any child daring enough to enter the fence behind which are the solar panels.</p> <p>A last issue is that the fields on the proposed sight of development are prone to flooding during periods of heavy rainfall, this can be verified as a problem by residents close to the proposed development site, such as those who own Bramble Farm. As I am sure you are aware, concrete, being a non-porous material is far for likely to promote flooding than the present soil and plants of the fields that aid in reducing flooding.</p> <p>Finally on Southwick Court itself, as a Grade II listed building and with features of historic interest, such as its double storey gatehouse, it makes a farce out of the grade listing system to build so many new houses so close to Southwick Court's house and grounds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	89	Consultee Mr Timothy John-Garrett Purnell Person ID: 1119640	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Proposed land for the Development of Houses at Southwick Court</p> <p>The following presents a few points in expostulation of the proposed development of land belonging to Southwick Court (Trowbridge, Wiltshire) for houses (yellow area in Fig. 1 p.4).</p> <p>Two species protected by law have been seen within the aforementioned land proposed for development and on the peripherals respectively of said land. One seen regularly by the author and other residents near to the proposed development site is the Kingfisher (<i>Alcedo atthis</i>), which is protected under Schedule 1 of the Wildlife and Countryside Act 1981. This species has been seen on both the brook running parallel to the first field bordering Boundary Walk (and to the east of Boundary Walk), and at the moat surrounding Southwick Court. As the Kingfisher is a species sensitive to disturbance, any anthropogenic development in the vicinity of where the species occurs should be in sympathy to the bird's habitat requirements (RSPB, 2015) to minimise disturbance to the species.</p> <p>The Second species is the Water Vole (<i>Arvicola amphibious</i>), identified by the Author as distinct from the Brown rat, which it is often mistaken for, by its blunter head, smaller ears and shorter tail, and distinguished by other UK vole species by its considerably larger size. This species is protected under Section 9, Schedule 5 of the Wildlife and Countryside Act 1981. The Water Vole is in steep decline in the UK and is another species sensitive to anthropogenic disturbance, as I am sure you are aware, it is illegal to harm areas that the this species uses for shelter and protection.</p> <p>Therefore it is law to carry out a survey before any building can take place, to ensure that places where these species inhabit are not damaged by human development.</p> <p>The building of houses on the land proposed for development may destroy the hedgerow (highlighted in part approximately between two purple arrows in fig. 2 p.5) that borders the brook running parallel to Boundary Walk and other houses to the east of Boundary Walk along which the brook and hedge forms a border. This hedgerow meets one criterion that defines it as a hedgerow by law, namely that it is over 20 metres, additionally that this Hedgerow is over 30 years old (digimap, 2017) and near a public footpath, it is protected under the Hedgerow Regulations 1997 (Gov.UK, 2016).</p> <p>This hedgerow could be labelled an 'Important Hedgerow' under the Hedgerows Regulations 1997 as it meets at least one criterion for that legal status (Gov.UK, 2016). This criterion being that the hedgerow is part of a field system that existed before the Enclosures Act 1845 (Wiltshire County Records, residing in Chippenham).</p>				

	<p>Furthermore, if the hedgerow marked by the purple arrows, can be construed as being related to Southwick Court House and said house's Moat, it could meet a second criterion for 'Important' status. This criterion is that if a hedgerow related to an Estate or Manor that marks the boundary of an estate or manor or looks to be related to any building or other feature that's part of the estate or manor that existed before 1600 (Gov.UK, 2016). Southwick Court is an Estate that existed before 1600 (Crittall, 1965), along with a section of the present Southwick Court house (Wiltshire Council, 2011), additionally the moat and the Gatehouse, which can be construed as features of Southwick Court, also predates 1600 (Mee, 1950; Crittall, 1965). If this hedgerow, or a section of the hedgerow, does carry 'Important' status then the local planning association (presumably Wiltshire planning association) by law should refuse the hedgerow's removal.</p> <p>Finally while the land of proposed development is technically termed 'Green Field' as opposed to 'Green Belt', these terms appear to be applied to land in an arbitrary manner. In reality, once the proposed houses are built, there will be very little land left between Southwick and Trowbridge - when looking at it from the Boundary Walk area to those houses South of Bridge Breach Lane (fig 1.) - that can be called 'Green Belt'. Therefore Southwick and Trowbridge, for all practical purposes, are one and the same human settlement and pitifully and insistently differentiated solely by name.</p>
Attached files (Please see Objective)	4687468
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	90	Consultee Miss Pamela Gabell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119698		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing delivery strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site: Woodmarsh and all in Southwick & North Bradley</p> <p>Section 6 of the comments form:</p> <ol style="list-style-type: none"> 1. Area prone to flooding 2. Are there any plans for road access etc? 3. School places! 4. Are there any plans for Doctor/Dentist practices to be increased? 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	91	Consultee Mrs Pauline Jenner Person ID: 1119713	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>WILTSHIRE COUNCIL'S PROPOSED NEW 740 HOUSES ON NETHERHAMPTON ROAD SALISBURY</p> <p>I have seen the Draft Plan on the proposal to build new houses on the Netherhampton Road,Salisbury and submit my comments below:</p> <p>The impact on people living in the Netherhampton Road area will be devastating.</p> <p>The volume of traffic in Netherhampton Road has already reached maximum capacity with commuter cars to and from the City centre, delivery vans, school runs, HGV vehicles using the route from Southampton Docks to the West Country, all needing to use the Harnham gyratory which often brings traffic to a standstill. The noise, the fumes and the inability to actually get on to the road from side roads is a very genuine concern.</p> <p>With another 740 houses using another 1000+ vehicles, a new school and the possible redevelopment of Churchfields this Plan cannot go ahead without a complete review of the infrastructure.</p> <p>Netherhampton Road cannot take more vehicles and for this reason I do not support the proposals.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	92	Consultee Mr Kenneth Jenner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 403805		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>WILTSHIRE COUNCIL'S PROPOSED NEW 740 HOUSES ON NETHERHAMPTON ROAD SALISBURY</p> <p>I have seen the Draft Plan on the proposal to build new houses on the Netherhampton Road,Salisbury and submit my comments below:</p> <p>The impact on people living in the Netherhampton Road area will be devastating.</p> <p>The volume of traffic in Netherhampton Road has already reached maximum capacity with commuter cars to and from the City centre, delivery vans, school runs, HGV vehicles using the route from Southampton Docks to the West Country, all needing to use the Harnham gyratory which often brings traffic to a standstill. The noise, the fumes and the inability to actually get on to the road from side roads is a very genuine concern.</p> <p>With another 740 houses using another 1000+ vehicles, a new school and the possible redevelopment of Churchfields this Plan cannot go ahead without a complete review of the infrastructure.</p> <p>Netherhampton Road cannot take more vehicles and for this reason I do not support the proposals.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	93	Consultee Mrs Margaret Robinson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 402956		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>WILTSHIRE COUNCIL'S PROPOSED NEW 740 HOUSES ON NETHERHAMPTON ROAD SALISBURY</p> <p>I have seen the Draft Plan on the proposal to build new houses on the Netherhampton Road,Salisbury and submit my comments below:</p> <p>The impact on people living in the Netherhampton Road area will be devastating.</p> <p>The volume of traffic in Netherhampton Road has already reached maximum capacity with commuter cars to and from the City centre, delivery vans, school runs, HGV vehicles using the route from Southampton Docks to the West Country, all needing to use the Harnham gyratory which often brings traffic to a standstill. The noise, the fumes and the inability to actually get on to the road from side roads is a very genuine concern.</p> <p>With another 740 houses using another 1000+ vehicles, a new school and the possible redevelopment of Churchfields this Plan cannot go ahead without a complete review of the infrastructure.</p> <p>Netherhampton Road cannot take more vehicles and for this reason I do not support the proposals.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	94	Consultee Lucy M	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119762	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing this email to object to the proposed new houses on Netherhampton road. The traffic is bad enough as it is, there are not enough school places. We have always believed you should place your child at a school within walking distance but everyone now is so lazy they drive. PLanning to build on Waldrons farm which floods quite heavily in the winter does not make sense and taking away much needed farmland which should be protected, to stop urban sprawl. What are brownfield sites for.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	95	Consultee Mr Clive Burke	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 897503	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>If your plans to build 600 new homes in our green fields around Trowbridge are approved, you will destroy the identity of Hilperton, Southwick and North Bradley.</p> <p>There are sufficient building sites in the centre of our County Town at the old Bowyers site and the existing Aston Park development.</p> <p>Please do not continue to ruin our environment by the destruction of green space in the interest of Developers.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	96	Consultee Mr Ian Algar	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119992	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Having lived in Westmead Crescent for the past 25 years, I am appalled to hear about the proposal to build houses on the fields adjacent to Boundary Walk. In an over populated Town, do we need more people, more cars and more burden on the health service and schooling? I think you probably know the answer! Money talks!!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	97	Consultee Mr Garry Stewart Project Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Carillion PLC Person ID: 1119997		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.46			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We understand that consultation is taking place regarding a Wiltshire Housing site allocation plan and would like to comment. This year, planning was passed in our garden (16/09372/FUL) and yet on the proposal this area of our garden was omitted for inclusion and the proposed boundary line steps in to the path. This area is between the Vicarage and 79 The Green, in the bottom left hand corner of grid ref 2,1 for the Lyneham proposal.</p> <p>Would it not be a more true representation of what now exists to have this included in the line?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	98	Consultee Mr Will Templer Person ID: 856196	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.57		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My property isn't shown in the table on page 42 being in I8. The proposed new boundary doesn't follow the line of my property to the road but egresses back into my property for no good reason. It should follow the road and then from the road go directly down the side of my property rather than dogleg.</p> <p>[NB - Note from officer: The representation made reference to 'Page 41 & 42'. It is assumed that the comment refers to the plan of the proposed revised settlement boundary for Sutton Veny (Figure A.57 Draft Wiltshire Housing Site Allocations Plan) and also relates to Appendix A (Table A.6) of the Warminster Community Area Topic Paper.]</p> <p>I suggest the boundary follows Hill Rd and then moves directly down the side of my property.</p> <p>[A hand drawn map was included with the hand-written form, and is included here as a PDF attachment.]</p>				
Attached files (Please see Objective)	4698203				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is only necessary if my suggested amendment is not understood.				

Comment ID:	99	Consultee Philippa Bullen Equality and Human Rights Commission	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120148		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Commission does not have the resources to respond to all consultations, and it is not our practice to respond to consultations on local plans or infrastructure projects unless they raise a clear or significant equality or human rights concern. Local, Parish and Town Councils and other public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of their policies and decisions on people sharing particular protected characteristics. We provide advice for public authorities on how to apply the PSED, which is the mechanism through which public authorities involved in the planning process should consider the potential for planning proposals to have an impact on equality for different groups of people. To assist, you will find our technical guidance here.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	100	Consultee CLH Pipeline Systems Ltd	Agent Ms Emma Pattison Fisher German	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 987736	Person ID: 846301	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Thank you for your email to CLH Pipeline System Ltd dated 13 July 2017 regarding the above. Please find attached a plan of our clients apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to www.linesearchbeforeudig.co.uk our free online enquiry service.				
Attached files (Please see Objective)	4691602				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	101	Consultee Ms L MacDermott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120322	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We live at Church Lane, Upper Studley BA14 OEH. Along with our neighbours our property is grade 2 listed. According to the listing guidelines and development pertaining to such properties, any development has to fit certain criteria. This is not simply the structure of the listed building but location, context and surrounding. Any development that is obviously visible from the said listed buildings is detrimental to the buildings themselves which have been listed intrinsically with the location.</p> <p>Our address is Church Lane. It is not Off the M4 next to a housing estate. The setting is the lane, the church, and the extent thereof being the parish boundary. Any development affecting this setting is contrary to policy: local government, town and national planning. Section 66 of the Listed Buildings Act states that in planning the Council must pay particular regard to protecting the setting of listed buildings.</p> <p>Whilst we appreciate planning and development are necessary, it is fairly obvious that the council gets it wrong sometimes. As an example whoever gave planning for the "lead bunkers" to be stuck on the side of St John's Church in 1980 obviously was either mad or had no idea of what a Victorian gothic church was or is.</p> <p>So, in conclusion, to avoid incorrect planning decisions, any development in the fields (marked X and Y on the Historic England page included) along Church Lane would be inappropriate from a town development point of view (the buffer zone between villages being taken up, the apparent attempt to change parish boundaries ie. Church Lane, the destruction of a setting that has been unchanged since the church and associated buildings were erected in the mid 19th century). There is no justification in planning law to ignore the legal standing of a listed building when it has been listed for very specific reasons.</p>				
Attached files (Please see Objective)	4691979				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	102	Consultee Dave Brown	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120337		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my views and objections to the proposed housing development plan in Trowbridge, North Bradley and Southwick. In a general sense I object to some 700 houses, the majority being planned in Wiltshire being build in such a confined area, all on green belt land when there are huge areas of undeveloped land in and around towns, brown field believe it is referred to. Why the need to destroy more countryside?</p> <p>Also, in a general sense, the 700 new homes (plus I believe planning permission has been granted for the old West Wiltshire Council site on Bradley Road, a mere stone throw away from north Bradley and Southwick) will result in a huge increase of traffic, putting pressure on an already busy part of Trowbridge. Bradley Road, near to spitfire retail park is already a traffic nightmare due to McDonalds and associated businesses. Adding 700 new homes and likely twice the amount of cars will bring the area to a halt! There is also insufficient infrastructure to meet the needs of these new families. Trowbridge schools are already woefully oversubscribed and the planned building of a new secondary school on the new Hilperton Castle Mead estate will only serve the masses of children in that area, another 700 families' needs will not be met by just the building of one more secondary school. There will also clearly be a knock on affect to primary schools, doctors' surges, dentists and a host of other, seriously neglected services in the area.</p> <p>all this being said, I am not naïve enough to think that no housing will be built. Clearly, new homes must be built and at least one of the three sites (A363 white horse business park, Elm Grove Farm and Southwick Court) will have to be built, but common sense must prevail and a stop to at least one (ideally two) must be made.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	103	Consultee Dave Brown	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120337		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>looking at all three sites, the A363 White Horse Business Park is clearly the least sensible: a capacity of 338, reduced to 150 due to 'mitigating factors'. This site will not solve the housing issue in Trowbridge; compared to the other two proposed sites it offers really poor value in respect to what the plan sets out to achieve. The location of the site also begs questions about access to it, as Woodmarsh is a residential road which already suffers from speeding (Councillor Prickett is campaigning for speeding measures due to the already excessive use of the road); as already noted the build up of traffic on Bradley Road is already bad and the use of Southwick Road going to the A36 is overused by heavy goods vehicles that speed into the village. The access to Yarnbrook is, and has been problematic for years, and is often queuing back to North Bradley as things stand. This proposed site will only add to the already problematic traffic congestion.</p> <p>Perhaps the most pertinent point against the development though, which is based on a precedent made by Wiltshire Council at the Paxcroft development, is that the building on the fields behind Woodmarsh will result in the joining up of Trowbridge and North Bradley, meaning that North Bradley will ultimately lose its independent village status. When the Paxcroft estate was built some years ago, it was only granted due to an agreed plan to leave a strip of fields between the village and the new estate, therefore ensuring that the Village of Hilperton remained separate to Trowbridge. I would like to think that this policy would extend to all villages surrounding Trowbridge and not just to villages that have influential Wiltshire Councillors in them.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	104	Consultee Dave Brown	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120337		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	of the three sits, the most logical site to develop would be the Southwick Court site, as this will then have the benefit of multiple access points through the already well served and accessed College estate area and Boundary Walk area - most areas of Boundary walk already have 'dead end' roads, that would be easily converted to access roads for the new build. it does not run the risk of Southwick losing its independence and offers relatively good value for money in respect to houses lost for mitigating factors.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	105	Consultee Dave Brown	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120337		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Of course, the Elm Grove development does have the best housing ratio, but would suffer with significant (almost as much as the white horse development) access and traffic concerns. Drynham road is essentially one way due to only being able to turn left at the end onto county way. The multiple 'rat runs' up onto Bradley road are already dangerous due to the amount of traffic on Bradley Road and the inability of drivers to see, resulting in people pulling out of roads. As already noted Bradley road is already under pressure by the new build off of Wiltshire Drive. The train track that runs between Longfield (and surrounding area) and Drynham road means there will never be easy access out of Trowbridge in that direction, resulting in the traffic either coming directly onto Bradley Road (see earlier Spitfire retail Park note) or onto the trading estate, therefore looking to access Yarnbrook which simply cannot handle more cars.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	106	Consultee Dave Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120337	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Consultation			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As an aside, I would also like to note that the physical 'consultation' being held on four days (working days may I add) across the County offer residents in the local area little opportunity to pass comments. One could surmise that Wiltshire Council merely wants to run a tokenistic 'consultation' and the deal is already done. By all means consult those in the outer reaches of the County who will not be affected by this proposal, but please allow suitable alternative dates for local residents to express their views.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	107	Consultee Mrs Alison Hoskins	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 895657		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbidge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I'm writing to express my concern regarding Wiltshire Council's proposal to build 600 houses around Trowbridge on fields that form gaps between the town and Hilperton, Southwick and North Bradley. I believe these proposals are wrong and unnecessary. They are developer led and ignore the town's needs and those of the villages concerned.</p> <p>Hilperton, Southwick and North Bradley are villages with unique identities. They should not be forced to lose their much-valued green space and become suburbs of Trowbridge.</p> <p>Unlike central Trowbridge and Upper Studley, the Hilperton side of the town has no green open space with public access apart from the fields of the Hilperton Gap. Please don't rob us of this vital resource.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	108	Consultee Tessa Welbourn	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120376	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to object to the amount of building which is being proposed for the North Bradley area. My family and I live at The Rank North Bradley and we bought the house because we wanted to live in a village not in Trowbridge.</p> <p>There are various reasons why this amount of development in this one village is outrageous. I have also been informed by our Mr Prickett that we are over our allocation for Wiltshire so why this amount more in one village. Wiltshire is a large county it does not all need to be in this small area, we will be left with no green fields between the villages and Trowbridge.</p> <p>Reasons against The villages of North Bradley, Yarnbrook, West Ashton and Southwick will become part of Trowbridge this is outright wrong. Loss of green fields for all forms of wildlife especially the Bat community. Loss of green fields for farming which at this point for the UK is crucial as due to people voting for Brexit we will be having to rely on the UK to feed the country as imports will cost too much. I don't suppose any councils have even thought this far ahead. Destroying the heritage of the area. Lack of infrastructure for this amount of people and no decent facilities or public transport.</p>				
Attached files (Please see Objective)	4692062				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	109	Consultee Mr Michael Townley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899514	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is NOT a NIMBY protest but comments on the suggestions that additional dwellings are to be sited on Green Land around Trowbridge. Depending on which paper is studied your proposals are to add up to 900 new dwellings in the Trowbridge area, instead of spreading any new needs throughout the County:-</p> <p>On whose authority was the number 900 chosen and on what legal right is this number to be imposed on Trowbridge Town? It is NOT a requirement imposed by the Government.</p> <p>The Wiltshire Council Local Plan was only approved 2 years ago and these figures are "additional". The 'legality' is dubious.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	110	Consultee Mr Michael Townley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899514	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is NOT a NIMBY protest but comments on the suggestions that additional dwellings are to be sited on Green Land around Trowbridge. Depending on which paper is studied your proposals are to add up to 900 new dwellings in the Trowbridge area, instead of spreading any new needs throughout the County:-</p> <p>It is accepted that there is a significant shortage of "Starter" homes. Why are not all the existing "brownfield" sites in the Town not being pursued - a little more rigorously? These "Brownfield sites (eg Bowyers...) already have the majority of services and infrastructure in place. Developers appear to be driving the supposed need for new dwellings - but prefer the 'easy' option of developing green field sites.</p> <p>It is accepted that there is Climate change and that this World is heating up. It appears foolish to 'seal' green spaces off with dwelling plots, garages, driveways and access roads and pavements. Once 'sealed' the land becomes impervious to rain and more flooding?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	111	Consultee Mr Michael Townley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899514	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This is NOT a NIMBY protest but comments on the suggestions that additional dwellings are to be sited on Green Land around Trowbridge. Depending on which paper is studied your proposals are to add up to 900 new dwellings in the Trowbridge area, instead of spreading any new needs throughout the County:- Planning Authorities appear reluctant to insist that clusters of new dwellings do not need any other infrastructure than new roads. Communities need Shops, Meeting Halls, schools, Worship Venues, Play Areas, Parklands etc. The new CIL does NOT satisfy the whole needs of a Community.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	112	Consultee Mrs Jean Monico	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1114410	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A4.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	With reference to the draft Wiltshire Housing site Allocations Plan in particular to Semington, we would request that when the Settlement boundaries for the village are reviewed that in order to include the Hannick House Development in St Georges Rd that this allocation also be extended to include the paddock area to 14 The Knapps.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	113	Consultee Mr and Mrs J Pickard	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120523		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am a resident on Bradley road in Trowbridge and wish to put forward my absolute objection in the strongest most possible terms to the proposed building of housing at Southwick Court site 3565.</p> <p>I live at Bradley rd and I am hugely concerned that not only will the new development have a monumental effect on the traffic but also that the infrastructure is not readily available to cope with more residents in an already crowded area. This will put considerable strain on the schools and doctor surgeries - which are already at breaking point.</p> <p>The Southwick site does not offer very good public transport to the town centre/train station, local shops and doctors surgery are not in comfortable walking distance for most people. Therefor I feel that I have to strongly object to these proposals in line with the objections of my neighbours.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	114	Consultee Mr and Mrs J Pickard	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120523		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am a resident on Bradley road in Trowbridge and wish to put forward my absolute objection in the strongest most possible terms to the proposed building of housing at Southwick Court site 3565.</p> <p>While I agree that there is a desperate need for more housing in Wiltshire, surely there are places that can be redeveloped at brownfield sites? areas that look a disgrace and need to be utilised in the centre of town, "By the sea road for example". Why take away an area of natural beauty, cause destruction to wildlife, hedgerows and wild bats when there are so many other places to be developed?</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	115	Consultee Daisy Pecover	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120545	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		North Bradley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am very concerned about the houses you are proposing to build in North Bradley. I understand there is a need for more houses across the county but why so many here?? I think the amount needs to be reduced to make it fairer. Woodmarsh, Southwick Rd and the Westbury Rd are all very busy roads and I dont know how the roads would cope with all the extra cars that would be in the area. Many children (including my own) walk to school from all of these roads and I feel that it would cause a danger to them with an increase in the number of cars. North Bradley Primary school is full... are you considering building another school? What about Secondary schools??</p> <p>I do not feel that North Bradley has the infrastructure to cope with all the new houses and i strongly object to the proposal. Unfortunately I didnt make it to the last meeting so I would like my feelings to be noted.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	116	Consultee Mr Bernie Bradshaw	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 869060	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Pewsey settlement boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a formal response I would like to request that the land to the east of Ball Road Pewsey is removed from the Pewsey Plan as land with the potential for development. The new development line has already been proposed by Wiltshire Council (attached) and I believe it was only due to a lack of communication between County and Parish that has prevented this being agreed already. The primary reason for the redrawing of the LoD is that over 2014-16 a proposal for housing was rejected by Pewsey Parish Council on 3 occasions, rejected by Wiltshire County Council on 3 occasions; and finally rejected by the independent assessor from Bristol. I believe it will save a good deal of time and effort if the LoD was put back to pre 1985.				
Attached files (Please see Objective)	4692217				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	117	Consultee Mr Simon Jackson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120594		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.136			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This paragraph provides grossly insufficient information regarding how the road network can/will be modified to manage what is recognised will be very sufficient increases in road traffic. In the absence of a detailed road traffic plan and costings the overall plan is flawed. A fully detailed road traffic plan is required to prove that the local road network can be adapted to cope - it is not sufficient to articulate this significant barrier without a detailed, costed plan within the draft plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	118	Consultee Miss Caroline Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120591		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Para 5.127 - 5.138		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan for the development in Harnham is dependent on a major review of the road network to accommodate the increased traffic, but this major review has not yet been done. A holistic approach to this housing development is critical and must be undertaken. Detailed proposals for the improved road network must be prepared and considered alongside the proposed housing development, so that informed decisions can be made. At the moment it is difficult, if not impossible, to see how and where improvements could be made to the road network to accommodate the significant increase in traffic that would inevitably arise from a housing development of this size (likely a minimum of two cars per house, plus delivery lorries/vans etc). The Harnham Road is already gridlocked at certain times of the day, and recent chaos caused by the bridge repairs only serves to reinforce the huge transport difficulties that already exist on this side of the City. Those wishing to enter the City from this side will struggle more than they currently do, which cannot be good for the City, with e.g. local businesses and the City's tourism offer being adversely affected, with people and goods stuck in huge traffic jams. There is also often a backlog of traffic from the Exeter Street roundabout wanting to enter Southampton Road, and this will be exacerbated by the additional traffic coming from Harnham.</p> <p>Just because housing on Churchfields is proving more difficult than hoped to bring to fruition does not mean that the seemingly softer option of Netherhampton and Harnham should be brought forward instead. The huge adverse consequences of these proposals have not been thoroughly considered.</p> <p>Despite reassurances, the increased traffic, especially if stuck in jams for long periods of time in a largely residential area, must result in an increase in pollution, with a significant detrimental effect on the health of the residents.</p> <p>I also have concerns over the ability of the area to cope with the increased drainage that will be needed to support the significant development and also the impact of additional surface water on the Netherhampton Road.</p> <p>I suggest building a small new market town in the north of the county. This would avoid all the issues and problems highlighted above, that will affect not only the immediate areas of Netherhampton and Harnham, but also the centre of the City as well, with the likely loss of visitors and business, deterred by the difficulties of getting into the City itself. The new market town would resolve the difficulties of trying to find places to build in the already congested Salisbury City area, and would also easily satisfy Wiltshire Council's requirement to build new homes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	119	Consultee Ms Joanne Chandler Person ID: 1120651	Agent Mr Richard Cosker RCC Town Planning Consultancy Person ID: 1120649	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We would like to confirm that, in regards to this site (SHLAA site 1089) we find the Wiltshire Housing Site Allocations Plan to be legally compliant and sound. We have considered the references to this site in the DPD and agree that the site should be brought forward. The site owner has already commissioned both a tree survey and a landscape and visual report to address the issues raised in the DPD and these have shown that there are no landscape reasons to preclude development on this site. Finally we can advise that the owner of the site is willing and able to deliver the site immediately.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	120	Consultee Rachel Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I feel I must object in the strongest terms about the following.</p> <p>Building permission has been granted for 5892 new homes in Trowbridge and yet not one has been built. Yet planners are now looking at green field sites to locate yet more houses. Tell the developers to get on with the sites they have been given permission for. Or is it because the bats are holding up building work. Planners and developers knew of the bats, if it's such a difficult thing to put all the procedures in place to protect the bats why was permission given in the first place. This is no excuse to look at other sites before you have dealt with the ones you have.</p> <p>I as well as others have noted that a number of traffic counts have been placed around Trowbridge, notably Frome Road at least two, New Town, Country Way at least two, Wingfield Road, but not Bradley Road. You have placed two either side of the roundabout for the White Horse Business park on the A363. I fail to see how this is going to tell you how much traffic uses Bradley Road.</p> <p>This was noted on the 8th July. I live on Bradley Road and know only too well how busy it gets during school terms. Yet the traffic counts have been placed during the summer and school holidays. I suggest if you really want to get an idea of traffic in Trowbridge you place these counts during the autumn in school term time. If housing goes ahead at North Bradley site 298, Drynham Lane site 613 and 248, and Southwick Court site 3565 and don't forget the old council office site on Bradley Road all this extra traffic will use Bradley Road.</p> <p>I do feel that the planners are letting Trowbridge down, I know we need new houses and the fact that Trowbridge has been told to find sites for a further 700 does not put the country council in a good light. The population of Trowbridge is approx 40000 and with all this new housing it will increase by approx 25 per cent. So allowances must be made for schools and medical facilities along with extra emergency services.</p> <p>I feel at the moment that Trowbridge a lovely small town is being badly let down by its council.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	121	Consultee Rachel Turner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I noted that you intend to change the boundary to accommodate the new housing estate, on what you are calling Southwick Court. If you do so this estate won't be in Southwick so can't really be called Southwick Court. Then you will have Southwick Country Park facing a Trowbridge housing estate, it all seems muddled and confusing. I don't think you have thought the change of boundary through properly.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	122	Consultee Mr John Lauder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120660	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a North Bradley resident for over 40 years, I should like to comment on the proposed housing development around North Bradley and Southwick, specifically these areas:</p> <p>1. The area south of Trowbridge next to Southwick (Southwick Court).</p> <p>I should like to register a strong objection to these areas being used for housing, for the following reasons:</p> <p>1. These developments will destroy the integrity of North Bradley as a village, and further threaten the integrity of Southwick. I believe it is important to retain these villages as separate entities.</p> <p>I believe that Trowbridge and its environs are being treated as a soft touch, and we are being sacrificed to protect other areas of the county.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	123	Consultee Mr John Lauder	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120660		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a North Bradley resident for over 40 years, I should like to comment on the proposed housing development around North Bradley and Southwick, specifically these areas:</p> <ol style="list-style-type: none"> 1. The area south of Trowbridge next to Southwick (Southwick Court). I should like to register a strong objection to these areas being used for housing, for the following reasons: 2. The road infrastructure in North Bradley will be unable to cope with the increased traffic, particularly because there is insufficient work in this area, and the residents will need to drive to other areas in order to work. I am already concerned about the levels of traffic in Southwick Road, and I have been lobbying for a weight limit on this road, which at least would reduce the traffic level. Southwick Road is a class C road which is being treated as an A road by lorries using it as a 'rat-run' to get to the A361 from the A350. 3. North Bradley Primary School is already full and there is no capacity to expand it. 4. Local bus facilities are inadequate for the village even with its present population. <p>I believe that Trowbridge and its environs are being treated as a soft touch, and we are being sacrificed to protect other areas of the county.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	124	Consultee Mr John Lauder	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120660		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a North Bradley resident for over 40 years, I should like to comment on the proposed housing development around North Bradley and Southwick, specifically these areas:</p> <ol style="list-style-type: none"> 2. The fields between the White Horse Business Park and Woodmarsh. <p>I should like to register a strong objection to these areas being used for housing, for the following reasons:</p> <ol style="list-style-type: none"> 2. The road infrastructure in North Bradley will be unable to cope with the increased traffic, particularly because there is insufficient work in this area, and the residents will need to drive to other areas in order to work. I am already concerned about the levels of traffic in Southwick Road, and I have been lobbying for a weight limit on this road, which at least would reduce the traffic level. Southwick Road is a class C road which is being treated as an A road by lorries using it as a 'rat-run' to get to the A361 from the A350. 3. North Bradley Primary School is already full and there is no capacity to expand it. 4. Local bus facilities are inadequate for the village even with its present population. <p>I believe that Trowbridge and its environs are being treated as a soft touch, and we are being sacrificed to protect other areas of the county.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	125	Consultee Mr John Lauder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120660	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a North Bradley resident for over 40 years, I should like to comment on the proposed housing development around North Bradley and Southwick, specifically these areas:</p> <p>2. The fields between the White Horse Business Park and Woodmarsh.</p> <p>I should like to register a strong objection to these areas being used for housing, for the following reasons:</p> <p>1. These developments will destroy the integrity of North Bradley as a village, and further threaten the integrity of Southwick. I believe it is important to retain these villages as separate entities.</p> <p>I believe that Trowbridge and its environs are being treated as a soft touch, and we are being sacrificed to protect other areas of the county.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	126	Consultee CLH Pipeline Systems Ltd	Agent Ms Emma Pattison Fisher German	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 987736	Person ID: 846301	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Thank you for your enquiry dated 2017. We can confirm that our client's apparatus, the CLH Pipeline System – Energy Act 2013 (CLH PS), may be affected by your proposals as indicated on the attached plan(s). The plan(s) supplied are intended for general guidance only and should not be relied upon for excavation or construction purposes. No guarantee is given regarding the accuracy of the information provided and in order to verify the accurate location of the pipeline in conjunction with your proposals you should contact, to arrange a site visit. Please see attached an affected response to the above application.				
Attached files (Please see Objective)	4692333				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	127	Consultee Mr John Lauder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120660	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a North Bradley resident for over 40 years, I should like to comment on the proposed housing development around North Bradley and Southwick, specifically these areas:</p> <p>3. The land north of Drynham Lane on the south side of Trowbridge. I should like to register a strong objection to these areas being used for housing, for the following reasons:</p> <p>2. The road infrastructure in North Bradley will be unable to cope with the increased traffic, particularly because there is insufficient work in this area, and the residents will need to drive to other areas in order to work. I am already concerned about the levels of traffic in Southwick Road, and I have been lobbying for a weight limit on this road, which at least would reduce the traffic level. Southwick Road is a class C road which is being treated as an A road by lorries using it as a 'rat-run' to get to the A361 from the A350.</p> <p>3. North Bradley Primary School is already full and there is no capacity to expand it.</p> <p>4. Local bus facilities are inadequate for the village even with its present population.</p> <p>I believe that Trowbridge and its environs are being treated as a soft touch, and we are being sacrificed to protect other areas of the county.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	128	Consultee Mr John Lauder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120660	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a North Bradley resident for over 40 years, I should like to comment on the proposed housing development around North Bradley and Southwick, specifically these areas:</p> <p>3. The land north of Drynham Lane on the south side of Trowbridge.</p> <p>I should like to register a strong objection to these areas being used for housing, for the following reasons:</p> <p>1. These developments will destroy the integrity of North Bradley as a village, and further threaten the integrity of Southwick. I believe it is important to retain these villages as separate entities.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	129	Consultee Mr John Lauder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120660	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I do, however, have two suggestions which might help to mitigate the problem:</p> <p>1. There is an existing brownfield site in Trowbridge, at the old Bowyers factory. I understand there are proposals to develop this site for leisure purposes- a cinema, and shops and restaurants. I think this could be more sensibly developed in much the same way as the former Ushers site. The listed warehouse buildings could be converted into flats, and the rest used for housing. This has the advantage that the train station is within easy reach.</p> <p>An alternative use for this site could be for the owners to offer it or lease it to the University of Bath, to build a hall of residence and student flats. Both of these developments could help to persuade GWR to provide a better train service between Westbury and Bristol, which would benefit everyone.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	130	Consultee Mr John Lauder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120660	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I do, however, have two suggestions which might help to mitigate the problem:</p> <p>2. Why not ask Network Rail to put a new station (similar to those at Dilton Marsh and Avoncliff) on the line midway between Westbury and Trowbridge? This would allow residents of Paxcroft Mead to commute to Bath, Bristol and Salisbury using the train, thus reducing traffic further.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	131	Consultee Stuart Brown	Agent Mr Iain Cowan Owner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120664	Cowan Land Ltd Person ID: 1115452	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I act for Stuart Brown and I attach a plan showing his land ownership. There is also a bungalow at 16 Woodmarsh with land that could also be used for access and this is also in his control owned by his company SK Fruits of which he is the sole owner. All the frontage land adjoining this is also owned.</p> <p>The land is available for development and he intends to promote this land through a specialist promoter who will soon be appointed to proceed with this once a legal agreement has been finalised.</p> <p>I tried to complete the online application and may have succeeded but am not sure. There seems to be no scope to upload plans so I attach them here.</p> <p>Please confirm you have received this information and what other data you require at this stage. I am happy to meet to discuss further.</p>				
Attached files (Please see Objective)	4692378 / 4691279				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	132	Consultee Mr Nick Crangle	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 789551	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		All		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy appears to be ignoring the requirement in the core strategy to maintain an effective buffer between Trowbridge and North Bradley. There are also sites available that are not even mentioned in the document.</p> <p>Why has the old Bowyers site not been considered as a brownfield site for future housing, the document seems to only have identified greenfield sites.</p> <p>There is no mention in the document of the old Virgin building, where 100+ dwellings are planned. Also there is no mention of the ex West Wilts Council site, again where there is a planning application in for 100+ houses. North Bradley appears to be penalised for the fact that the Ashton Park development is behind schedule.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	133	Consultee Mrs Caren Clarke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120822		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury H3.1, H3.3 and H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Until the traffic problems are resolved in the West and East Harnham areas of Salisbury, the proposal to build 840 houses (Netherhampton Road and Rowbarrow sites) is nonsensical and will make the lives of all existing and potential new residents a nightmare. The Newbridge Road, which is the only logical route in and out of Salisbury City or east of the city for local residents in Harnham, is already at capacity. This road also serves thousands of day-trippers and holiday-makers heading for the South Coast and all residents from the south and many who live west of the city too, who travel daily to work in the city. The proposals for a Harnham Relief Road / Brunel Link Road were unsupported and unfunded; there is no public transport available and the proposed new locations for housing in West Harnham (740 - Netherhampton Road) are too far to walk into the city and there is no cycle route either. If the proposals are approved, traffic movements will increase exponentially. The road network in and around Harnham, Salisbury must be significantly improved before any new housing can even be considered.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	134	Consultee Mr Robert Deanwood Town Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		National Grid Person ID: 1024488		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>				
Attached files (Please see Objective)	4692647				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	135	Consultee Mr Michael Roberts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105805	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Refer to attachment SHLAA Proposal H2.6 – Site 3565 Land East of the A361 at Southwick Court</p> <p>I have read Wiltshire Housing Site Allocations Plan: Sustainability Appraisal Report together with Sustainability Appraisal – Summary of Assessment – (Trowbridge Community Area Topic Paper- Cabinet Version) as they relate to this site. Please find attached my consideration of these papers (support document) which shows my observations regarding development of this site. I am very concerned that the detrimental impact upon residential and leisure amenities together with potential visual impact of future development has been understated particularly regarding the eastern side of the proposed site. The proposed site is presented as having the ability to deliver 280 dwellings. Sustainability Appraisal Report tends to concentrate on area west of Lambrok stream but this is immediately discounted as Note H on attached support document. Capacity is thus immediately reduced to 180 dwellings. Wiltshire And Swindon Historic Environment Record MWI70093 shows Post-Medieval Water Meadows exist east of Lambrok stream. Note D of support document shows that east side of site is subject to water retention. If no appropriate mitigation measures have been put in place for the eastern area then capacity must be further reduced and viability of site questioned. Development is being loaded towards eastern part of the site and northern boundary will adjoin current settlement along Boundary Walk and further west. I refer to image of bungalows situated near top right corner of site shown on Note D of support document. The image was taken at a distance of around 160m at SE boundary of the field and centred on 17 Boundary Walk which is dwelling behind kissing gate. Windows seen are living room and kitchen and front elevation is within 7m of boundary made up by 4m front garden and 3m public footpath/verge. It may be assumed that a developer would want to maximise the available site which must lead to increased density and probability of three storey houses. The detrimental visual impact of such a development would be enormous and completely change the character of the area. Loss of privacy and overlooking of existing single storey dwellings is inevitable.</p> <p>The word mitigation appears frequently throughout both Sustainability Appraisal Reports and in essence reveals that the proposal is flawed. Suggested access would require an existing dwelling approach road to become, in effect, a through road with its inherent dangers. There are also too many natural and man-made obstacles that require mitigation or holistic planning to make this an obvious planning choice. There must be other suitable sites within the County that would not exhibit such encumbrances and would therefore be more acceptable to help meet the Council's housing quota</p>				
Attached files (Please see Objective)	4692925				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	136	Consultee Mr Chris Rolfe Wilton Estate Office	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 390659	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Wilton Settlement Boundary Review			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Further to your e-mail of 2nd August and the above, I refer to Appendix A 'Amended Settlement Boundaries' of the above document and the review of the Wilton Community Area under A107. We have the following comments on the settlement boundary review - pre-submission:-</p> <p>Area A: The Chantry barn conversion - Cob Cottage, Burcombe Lane, Wilton, Salisbury, Wiltshire SP2 0FF (Planning approval 14/02287/FUL): The proposed boundary should be amended to take account of the planning approval (see plan A attached).</p> <p>Area B: Wilton House Garden Centre, Salisbury Road, Wilton, Salisbury, Wiltshire SP2 0BJ: The proposed boundary should be amended to include the existing Park Garden House (plan B attached).</p> <p>Area C: Burdens Ball Farm, Queen Street, Wilton, Salisbury, Wiltshire SP2 0AL: The proposed boundary should be amended to include the area shown on Plan C attached. The railway line forms an effective edge to the settlement and access comes from the northern point of the site.</p>				
Attached files (Please see Objective)	4692685				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	137	Consultee Mrs Pauline Cridland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 466628	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Consultation			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I refer to my attendance at the Exhibition regarding the above which was held in the Guildhall, Salisbury on 19th July 2017. At this Exhibition I spent a long time speaking with David Waye and Tracy Smith together with looking at the displays on offer. I was disappointed that there were no other representatives of Wiltshire Council on hand to discuss matters arising from these allocations. I am in receipt of several of the documents handed out at this Exhibition and would comment that these are actually in a confusing form to the layman who may wish to comment as they do not actually address the issues in plain and simple terms. For instance they refer constantly to “yes”/“no” answers asking if things are Legally compliant. This may well lead a layman to not understand that they can comment regardless of whether the answer is “yes or “no”.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	138	Consultee Mrs Pauline Cridland Person ID: 466628	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Salisbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object to the allocation of land at Parcels s1027 and s1028 for the following reasons:</p> <ol style="list-style-type: none"> 1. The traffic currently using the A3094 (Harnham Road/Netherhampton Road) is constantly at gridlock at certain times of the day with its present load. The past few weeks with the bridge works would demonstrate this with long delays (sometimes in excess of 25-30 minutes) being a regular occurrence. 2. The Harnham Gyratory experiences severe hold ups at all times of the year, particularly during working hours and with school traffic. 3. The general area on to the A3094 is at bursting capacity for traffic and access to West Harnham, and in particular the Essex Square housing estate and the housing in Upper, Middle and Lower Street together with the housing estate there can only be achieved by using Netherhampton Road. The A3094 can only be accessed at either end from the Harnham gyratory or via Wilton or the narrow roads of Quidhampton. Any accident occurring on the roads at either end is attended by emergency vehicles travelling along this road. There are frequent occasions when traffic is diverted along Netherhampton Road following accidents or blockages. Any further traffic will make this road even more heavily overloaded and could slow access for emergency vehicles in an already well populated area. 6. The current bus route does not even cover the Wellworthy Estate and most residents there do not use the bus services but instead drive. To state that there are sufficient bus services nearby is very much stretching the truth. 11. I asked at the exhibition about traffic during the building of any homes, i.e. additional traffic for lorries, cement mixers, workers vans etc. There was no detail about how many extra traffic movements were anticipated during the building period, or indeed how long the building period was envisaged to be going to take. As stated above Harnham already suffers severe traffic problems so any added heavy, dirty traffic travelling along this road will impact severely during the building period for those residents who live on Harnham/Netherhampton Road and also for those trying to gain access to this road from the Essex Square estate using Norfolk Road, Folkestone Road (already severely impacted by the school traffic), Hollows Close (school traffic again), Upper Street and Lower Street and the various smaller roads coming on to the road. If this heavy traffic travels from the gyratory to the sites allocated they will pass along a single track road close to people's homes with all the incumbent problems of pollution, dirty air, filthy roads and noise. Unless there is to be provision for this traffic to somehow enter the building sites without causing deterioration to those residents along these roads I object strongly. The provision of new homes should not be at the expense of those already living in an area and paying into the local economy via tax and spending. Whilst provision of new homes to ease the housing crisis is welcomed by me it should not be into an area with no proper infrastructure or facilities. Harnham put simply cannot cope with what it has now, let alone another couple of thousand traffic movements a week. 12. There are currently large numbers of HGV's using the A3094 as a shortcut. Many of these lorries are articulated 44 tons and start moving along Harnham/Netherhampton Roads at 3.30 a.m. Shortly after I moved to my home in 2005 following a major crash outside my home, my local Councillor Mr Brian Dalton, undertook research into traffic along the Netherhampton Road. One of the things ascertained was that most of these vehicles which start travelling in the early hours have no business in Wiltshire but are merely passing through to head to the Bristol area and beyond and use the route through Harnham to avoid the ringroad and A36. The second thing discovered was that in excess of 50% of the traffic 				

at all times of day was breaking the speed limit of 30 mph by a third or more. However according to Wiltshire Council when they were approached as there had been no deaths on the road this is perfectly acceptable. When I undertook a survey of my home it was noted by my mortgage lender that my bungalow along with other properties along this road was at risk of damage from the large lorries passing. As my home shakes violently when these lorries thunder past I can well understand the reasons for noting this Any invitation for additional lorries carrying building materials etc. will exacerbate an already bad situation. Put simply the A3094 (which older local residents inform me was actually the B3094 until bridge works at the Skew Bridge occurred) is lined by properties whose residents suffer severe congestion, noise and pollution and any additional traffic, both heavy and residential may well take a toll on their health. I object to these proposals on the grounds that the Council/Police have failed to find a solution to the current speeding problem and any further increase in vehicle movements will put residents at risk of health problems, pollution and property damage.

13. When leaving my home at 5.30 a.m. to drive to work my husband is often unable to pull off our drive for the weight of traffic (particularly HGV's) passing our door. If we are unable to have access in and out of our home at that time of day currently we will have hardly any at all if these houses are built.

14. In the time my family have lived in Salisbury the A3094 has been dug up consistently for long period repairs caused by the weight of traffic on an unsuitable road. Gas mains were constantly rupturing and drains sink. When the entire road was closed on two occasions for weeks on end part of the reason was to attempt to stop the mains being damaged by the traffic. Only this Summer repairs have been undertaken in three places to raise and repair sunken drains. I have been prevented on 4 occasions from having access to my property during the day while long period rebuilding works of the road have been undertaken. When I raised the question of road repairs due to damage by traffic with Mr Waye he informed me that the Traffic Department has not passed any information of this nature to him and his team when they examined the area for suitable sites. I draw your attention to this issue now to enable you to obtain the details of this damage to the road and its inability to cope with the weight of the traffic sent this way. Might I suggest once more you discuss this issue with Mr Brian Dalton who has been the local Councillor for Harnham for as long as I have lived here and is fully conversant with the road repairs, gas main collapses etc. as he is a resident of the area as well and has experienced these situations in person. I do not believe that the actual road structure in its present state can cope with either (a) the heavy traffic required during the building period, or (b) any increase in normal daily traffic movements. The situation is not helped by the location of the lorry park and cattle market in Netherhampton Road, although my suggestion to Mr Waye and Ms Smith that traffic for the proposed sites could be barred from using the Harnham Gyratory end (where there is heavy density of housing) and directed to only use the access via Wilton House end was met with derision as apparently Wiltshire Council considers it impossible to bar traffic from certain areas at certain times. I did find this somewhat puzzling as I am aware of even areas of Central London where time bars operate to allow residents to sleep peacefully.

To round up, I object to these schemes on the grounds of current traffic levels, traffic chaos from building, pollution, effects on the existing community of Harnham's health, lack of medical facilities in the local area, the type of housing and affordability being proposed, lack of availability of transport facilities other than road, lack of mid-range jobs (salaried at £30,000 and above) within the immediate Salisbury area for the residents of these homes to work at without distance commuting by car, the provision of a large housing estate with no local shopping or religious facilities and overall national trends towards rental rather than house buying.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	139	Consultee David Rowles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121345	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5 West Lavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My address is High Street West Lavington, and have lived here for the past 25 years or so. In all that time, to my knowledge, the settlement boundary has always been to the North East end of my property and followed on South East then South West around the next door, which I also note has now been placed in the proposed exclusion zone. Both my property, High Street and the next door are quite clearly domestic buildings / gardens and I would therefor ask that you reconsider the proposals put forward and revert back to the original settlement boundary for both of the afore mentioned properties.</p>				
Attached files (Please see Objective)	4692920				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	140	Consultee Mr David Robertson Hindon Parish Councillor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Hindon Parish Council Person ID: 854597		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Tisbury Community Area Topic Paper			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The Tilbury Area Topic Paper is incorrect on page 7 (Table 2.3), as it states in column 3 and 4 that it is "unknown at this stage" whether the Hindon Neighbourhood Plan is allocating housing or reviewing its current settlement boundaries.</p> <p>Hindon Parish Council would like to confirm that they are preparing to allocate land for housing in their NOP, and that this will entail a review of their settlement boundary as part of a site allocation process.</p> <p>At present the DPD is not positively prepared as the evidence base does not reflect Hindon Parish Council's previous (2014) representations and ongoing dialogue with the Wiltshire Council planning team.</p> <p>The conclusions on p48/49 of the Topic Paper can remain unchanged as the NDP is taking forward the site allocation itself, this need not be covered by the Wiltshire Housing Site Allocations DPD.</p> <p>At a meeting on 14th July 2017, called by the Parish Council with the help of their NDP link officer, the Wiltshire spatial planning team requested that Hindon Parish Council put the above is writing as a representation to the Housing Allocations DPD</p> <p>The commentary in the Topic Paper for the Tisbury area on Tisbury Community Area Topic Paper (June 2017) p7 of the states 'unknown' next to whether the Hindon Neighbourhood Plan would like to review its settlement boundary should be amended to say:</p> <p>The Hindon NDP is proposing to allocate housing, around 30-35 dwellings.</p> <p>The Hindon NDP is proposing to review the current settlement boundaries to facilitate a site allocation.</p>			
Attached files (Please see Objective)		4693207			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Hindon Parish Council would like the right to participate in the oral part of the DPD examination should our comments not be satisfactorily taken on board as amendments to this DPD. These issues are critical importance to our Neighbourhood Plan			

Comment ID:	141	Consultee Mr David Robertson Hindon Parish Councillor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Hindon Parish Council Person ID: 854597		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Tisbury Community Area Topic Paper				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This is to confirm that Hindon CEVA Primary School has 4 classrooms. Three classrooms are within the main school an one is a mobile classroom. The mobile classroom has its own toilet facilities. we also have an on-site kitchen and a school hall as well as an admin office, staff room and storage facilities. We also have planning permission for a further extension within our school grounds. We have capacity for 65+ pupils. My estimation is that we could accommodate 80 children in our existing classroom/building set up.				
Attached files (Please see Objective)	4693209				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	142	Consultee Mr David Robertson Hindon Parish Councillor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Hindon Parish Council Person ID: 854597		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Tisbury Community Area Topic Paper			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Hindon Parish Council would like the right to participate in the oral part of the DPD examination should our comments not be satisfactorily taken on board as amendments to this DPD. These issues are critical importance to our Neighbourhood Plan The timetable for Hindon's NDP on p43 (Table E.1)of the Tisbury Topic Paper should be corrected as follows: Submission Oct/Nov 2017; Examination Feb/Mar 2018				
Attached files (Please see Objective)	4693211				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Hindon Parish Council would like the right to participate in the oral part of the DPD examination should our comments not be satisfactorily be taken on board as amendments to this DPD. These issues are of critical importance to our Neighbourhood Plan.				

Comment ID:	143	Consultee Simon Pritchard Clerk to West Tisbury Parish Council	Agent	Do you consider the draft WHSAP is legally compliant?	
		West Tisbury Parish Council	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.77			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re: Settlement Boundary Review 2017 West Tisbury Parish Council, at a meeting on August 10th 2017, considered your current settlement boundary review consultation for the settlement boundary around Tisbury and Hach. In general, the Council support the changes proposed. The Council would like to see one change:</p> <ul style="list-style-type: none"> • Within E8 & F8 that all the gardens should be included and a rationalization of the line would be that it follows the line of large Conifer trees (E8). The line would join Monmouth Road at west end cottage but carry on down the road to the conifer trees and head off in a straight line until it gets to the gardens at the back of Mount Pleasant then turning at a right angle to join the current line. <p>The Council make the following comment:</p> <ul style="list-style-type: none"> • Members supported the School site being included, but only for educational development <p>The Council seeks clarification on the following:</p> <ul style="list-style-type: none"> • It was noted that the red line was missing for the two green open spaces within Tisbury. The Council does not support the open spaces becoming part of the settlement and seek assurances that the two open spaces will remain outside (while being inside!) the settlement boundary? 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	144	Consultee Roger Bacon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121429		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2. Can the local school cope with another large influx of pupils plus the parking of parents cars at school time. There seems to on the one hand no provision for extra school places but speak to another of your representatives at the exhibition and they say there will be a school built at the new development on Netherhampton Road.</p> <p>5. Is there any plan to extend Odstock Hospital which is already at full stretch, bearing in mind the number of Army families that are returning to Tidworth Garrison shortly.</p> <p>6. Are there any plans for another doctors surgery as the last proposal at Rowbarrow put forward was turned down.</p> <p>8.The internet service is abysmal most days so an extra 740 houses is really going to help.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	145	Consultee Mrs Y M Meacham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446472		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>WILTSHIRE COUNCIL'S PROPOSED NEW 740 HOUSES ON NETHERHAMPTON ROAD SALISBURY</p> <p>I have seen the Draft Plan on the proposal to build new houses on the Netherhampton Road, Salisbury and submit my comments below:</p> <p>The impact on people living in the Netherhampton Road area will be devastating.</p> <p>The volume of traffic in Netherhampton Road has already reached maximum capacity with commuter cars to and from the City centre, delivery vans, school runs, HGV vehicles using the route from Southampton Docks to the West Country, all needing to use the Harnham gyratory which often brings traffic to a standstill. The noise, the fumes and the inability to actually get on to the road from side roads is a very genuine concern.</p> <p>With another 740 houses using another 1000+ vehicles, a new school and the possible redevelopment of Churchfields this Plan cannot go ahead without a complete review of the infrastructure.</p> <p>Netherhampton Road cannot take more vehicles and for this reason I do not support the proposals.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	146	Consultee S A Goddard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121618	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re. Draft plan Netherhampton Rd & Waldrons Farm As house owners living on Netherhampton Road we strongly object to the amount of proposed housing planned for Netherhampton Road & Waldrons Farm on the grounds of gross overdevelopment & associated increase in traffic which will be brought about by overdevelopment. Netherhampton Road is already at saturation point for traffic. In our three years of living here there have been several collisions on this stretch of road & only yesterday there was a serious one involving a livestock lorry & a pedestrian which with resulting traffic chaos grid locked Harnham. For all reasons mentioned we wish to register our comments on this planned scheme. Thank you.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	147	Consultee Mr Stephen Abbott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121643	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to register my grave concern regarding proposed housing development on Netherhampton Road, Harnham, Salisbury. As a cyclist who uses this route daily, it is quite clear to me that these roads will not be able to sustain the extra traffic (both construction and residents'): they are not fit for purpose.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	148	Consultee Mrs S K Evans Person ID: 448144	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Potential development on Netherhampton Road I am deeply concerned about any further large scale development along the Netherhampton Road in Harnham, Salisbury. A much smaller scheme of 470 houses was rejected some 3 years ago citing traffic issues. A planning application off Newbridge Road was also rejected because Newbridge Road was already deemed to be at capacity and there is no access to Netherhampton Road except by driving up Newbridge Road or approaching from Wilton. The Harnham gyratory is an accident waiting to happen as people constantly “jump” the lights, even bus drivers are known to charge the junction in order to catch the lights and just keep going if they change. Drivers, often lorries, block the junction from Downton Road because they do not want to stop but are still caught on the roundabout. This is very worrying as the Ambulance Station and Hospital are only accessed through this junction. If a school and trading park were added to the mix then the traffic movements would be greatly magnified and would probably be far worse than the congestion along the Southampton Road.</p> <p>Studies have shown that a very large proportion of the people who live in Salisbury do not work here it therefore stands to reason that more housing would increase traffic from all directions without contribution to the local economy. Why should Harnham suffer the loss of open space for the benefit of other towns?</p> <p>Such a huge scale development would harm the ambience of a quietly pleasant residential area not only with traffic, noise and pollution but road safety for elderly residents and the schoolchildren. There is only one convenience store and a fish and chip shop in the whole area and an hourly bus service.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	149	Consultee Mr and Mrs W Conway	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121678	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re: Boundary Walk Proposals This letter is to lodge a formal complaint about the proposed new builds along Boundary Walk. We have lived here for over 40 years, enjoying the peace and countryside. One of the main reasons for purchasing our Bungalow was because of it's idyllic location, quiet and peaceful. My husband has suffered with Dementia for many years and it's the calmness of looking out onto the green fields that help his condition as he can get easily agitated. I fear that seeing lorries, men with drills, new homes appearing and more people, will really upset his condition and will make my family's life very hard. Surely there must be other sites for you to build on?</p> <p>There will be no countryside left soon as it seems you make no consideration for anyone else as I suppose it really doesn't effect you personally. I hope the council reconsiders it's plans to build here, and I hope you read this letter to other council members as I'm sure I'm not the only resident to write to you.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	150	Consultee Mr R W Conway	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121687	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	You have enough 'proposed' sites in Trowbridge to build on including windfall sites like Bowyers & the area in Wiltshire Drive but are looking or potentially looking to destroy a local community.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	151	Consultee Mrs Katherine Phipps	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899859	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5.136 The “comprehensive improvements to the local and strategic road network” will cause considerable disruption to Harnham and will not be able to cope with the extra traffic created by this development. The A3094 is already unable to cope with existing traffic. Salisbury is a small city, already spoilt by overdevelopment and excessive traffic. Probably a 1000 more cars will result from 650 houses and this is unsustainable on Salisbury roads.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	152	Consultee Mr J Wigglesworth	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447313		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I went to a special meeting to hear of proposed planning in Durrington .</p> <p>As you are aware. The MOD have extensive plans at the School of artillery Larkhill</p> <p>Part of our Parish together with internal services. The housing content is 445 units with even Bulford camp increasing its size to the East. In consideration of that, it is generally thought that there should be special consideration of any intentions to increase housing in the Village/Town area. Until it can be seen just how the expansion will effect the area.</p> <p>You are also possibly aware that the increased number of all kinds of vehicles travelling both East and West has increased considerably through a 'Rat Run' of all size vehicles from coaches, lorries and cars from the A303 turn off at 'Solstice Park' using a classified 'B' road up Telegraph hill through Bulford Village, Durrington, Larkhill and Shrewton. All</p> <p>To avoid the inefficient Countess Roundabout junction. At present this also includes many kinds of Road works opening and closing with little notice to all locals.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	153	Consultee Mr J Wigglesworth	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447313		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.6 Larkhill Road, Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The idea that a large field to the south of Larkhill road should be built on will cause or bring many problems to Durrington as there would have to be a Junction made there! English Heritage would no doubt object because it is adjacent to the Historic Durrington Walls site, braking that faith of protection if this were to come about, it would destroy much wild life and the atmosphere and views of the Avon. It would also end up being increased in size over the years once a president had been set. The peace also of 'Watergate lane Bulford, where no improvement to its state can ever be undertaken.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	154	Consultee Mr J Wigglesworth	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447313	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>The other development on the North side of the Village is close to the 'Commonwealth War graves commission' Cemetery already a danger area as this is an unsigned land mark with very dangerous entry and exit to it for there is no Highway signed warnings on the A345.</p> <p>These remarks made by me do in fact form a large general opinion of the local area with poor shopping and parking areas in the Village, Small medical services and no Dental services and almost no local employment or apprenticeships available within a reasonable travelling area.</p> <p>I submit these observations for consideration and approval.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	155	Consultee Ann Lee	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 549888		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I asked about the large number of brown-fill sites within Trowbridge, somewhere in the region of 750 I understand. Why are these not included in the site allocation? Again when I queried this I was told they were already included. Is this correct? There was no indication of this. I understand that the Bowyers site is again on the cards for development, but likely to be another cinema complex. I feel that the Council should be insisting on brown field sites being developed before the use of greenfield sits. Information on these should be available at consultations as well.</p> <p>There is also the old garage site by Bowyers that should also be included. This whole site is an eyesore and is a disgrace to any town never mind Trowbridge which is the county town.</p> <p>Developers should be given incentives by the Council to include the older buildings into their plans. It is accepted that development costs may be higher being a legacy industrial site.</p> <p>The SHLAA talks about Trowbridge being a "Principal Settlement" and ripe for development. It is stated that "The role of the town as a significant employment and strategic services centre" is actually to be achieved. As already mentioned we have numerous vacant buildings and sites on trading estates.</p>				
Attached files (Please see Objective)	4694108				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	156	Consultee Angela and Brian Messam	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121833	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We visited County hall on July 26h and had a discussion with a member of the spatial planning team relating to the developments at A363 Whitehorse Park and Elm Grove Farm. Needless to say we came away totally convinced that, as usual, no consideration had been given to the volume of traffic at the Woodmarsh/ Bradley Rd Business Park roundabout. Currently all traffic leaving the B and Q and Halfords stores plus those leaving the Spitfire Business Park must turn left and either go straight on , left into woodmarsh or round the roundabout and go down Bradley Rd. With a proposal for 350 houses and an average of possibly 2 cars per household all converging on the roundabout as stated on 26th July, this will result in total carnage.</p> <p>We enquired about building between Wingfield Rd and Westwood Rd , the answer was " that has to stay as a green belt between Trowbridge and Bath", surely there is enough of that west of Winsley. We also note that there has been a traffic count around the North Bradley area but NOTHING at Woodmarsh. Typically this was done during the school and other holiday periods.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	157	Consultee Angela and Brian Messam	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121833	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We visited County hall on July 26h and had a discussion with a member of the spatial planning team relating to the developments at A363 Whitehorse Park and Elm Grove Farm. Needless to say we came away totally convinced that, as usual, no consideration had been given to the volume of traffic at the Woodmarsh/ Bradley Rd Business Park roundabout. Currently all traffic leaving the B and Q and Halfords stores plus those leaving the Spitfire Business Park must turn left and either go straight on , left into woodmarsh or round the roundabout and go down Bradley Rd. With a proposal for 350 houses and an average of possibly 2 cars per household all converging on the roundabout as stated on 26th July, this will result in total carnage.</p> <p>We enquired about building between Wingfield Rd and Westwood Rd , the answer was " that has to stay as a green belt between Trowbridge and Bath", surely there is enough of that west of Winsley. We also note that there has been a traffic count around the North Bradley aera but NOTHING at Woodmarsh. Typically this was done during the school and other holiday periods.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	158	Consultee Angela and Brian Messam	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121833	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We enquired about building between Wingfield Rd and Westwood Rd , the answer was " that has to stay as a green belt between Trowbridge and Bath", surely there is enough of that west of Winsley. Our feeling is if these developments take place Hilperton, North Bradley, Southwick and West ashton will lose their identity and become part of Trowbridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	159	Consultee Mr David Feather Person ID: 402574	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Chapter 4. Housing Delivery Strategy. Settlement strategy / location of development			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Please accept this attachment as an objection to housing sites 263, 297, 298, 613, 1021, 3260 and 3565. Thank you Trowbridge Community Area 1.1 The area around Trowbridge seems a very overdeveloped area and I have tried to put some figures on it. In the Trowbridge Community Area, ie in Trowbridge and the villages around it, the population density is about 1000 per square kilometre. The other Community Areas in Wiltshire are nowhere near as developed. For example Chippenham, the next densest, is only about a third of Trowbridge's. 1.2 The difference will be compounded by the growth proposals already approved in the Wiltshire Core Strategy. By 2026 the Trowbridge Community Area is expected to grow by a third, whilst Chippenham is expected to grow by a quarter. 1.3 Examining a plan of Trowbridge Community Area it can be seen that the developed areas (shown in blue) nearly fill the area (bounded by red). Surely it is time to put a hold on population expansion and come to a sensible agreement on what the Trowbridge Community Area should finally look like? The population needs green spaces for its physical and mental health as well as wildlife. People need to have homes in an area where they would enjoy living, rather than just existing. 2 Villages 2.1 Village life has changed dramatically over the past few decades. Village shops, post offices and pubs have gone, traffic has increased and village schools are only supported by children from far outside, often from local towns. Effectively the villages are becoming just residential satellites of the towns – if they are not so already. 2.2 My village, North Bradley is a good example. We have lost our shops and post office and the last pub is struggling to survive. We have had difficulty in maintaining a youth club and football and cricket clubs, possibly due to a considerable shift in the age profile of the village. The two village halls seem to exist because of usage by organisations outside the village. I believe that church congregations are also very low. 2.3 A village needs new life continually refreshing its age spectrum. The difficulty of affording homes must be a serious detriment. I believe that new housing in villages might be the key to helping villages keep their identity., rather than lose it. 2.4 I recently visited Martock, a village in Somerset. This is a large village which has retained its pub and some shops with a post office facility. From admittedly a limited visit, it seemed to have a strong village identity and community spirit. 2.5 I suggest that there must be an optimum size for a village population to support all the activities that make a collection of houses into a "village". This will vary according to the distance it might be from a town facilities and possibly the difficulty in getting into the town due to congestion and poor bus services. There may well be research into this subject and I would ask the Planning Department to pursue this.				
Attached files (Please see Objective)	4694852				
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	160	Consultee Mr David Feather	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 402574	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	2.6 In many cases new housing could help achieve by-passes for villages stressed by traffic. My idea of using development to achieve village by-passes has come as I have been involved in developing the Neighbourhood Plan for North Bradley. It seemed to me that a by-pass could be built as a development access road to the south of North Bradley to connect Southwick Road and Phillips Way. A similar road could be built to the south of Southwick. Both villages lie effectively on A361 and have been plagued by development proposals that offer no infrastructure benefits and could exacerbate some problems. It is time that some new approach was employed. Downton has accommodated a great amount of housing but the opportunity of building in a A338 by-pass was lost, a great shame.				
Attached files (Please see Objective)	4694853				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	161	Consultee Mrs Joy Jefferys	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121711		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure A.48			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>COMMENTS ON BEHALF OF MR TONY OSWIN OF 39 STAVERTON</p> <p>I wish to support the allocation of land for development adjacent to 39 Staverton BA14 6PA on behalf of Mr T Oswin who resides at number 39 Staverton. I am not his agent but a person who represents him in respect of planning matters. The proposed red line settlement boundary as drawn on figure A.48 shows a rounding off of land between the Staverton Club and number 39 Staverton. This would enable the sustainable development of a single dwelling which would then fall within the defined limits of Staverton in compliance with CP1 (defined limits) It would comply with CP2 Delivery Strategy creating a sustainable development which is within easy reach of the employment site to the East. The site would be adjacent to the B3105 and is within walking distance of Staverton C of E School, Canal Road Employment site and to public transport links.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	162	Consultee Mr ROGER COLEMAN Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Westwood Parish Council Person ID: 1121891		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Westwood Parish Council has no comments to make on this document				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	163	Consultee Mr Robin Jones	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121929	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, 5.136			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SHLAA ref. s1028 land by Netherhampton Road, Farnham, Salisbury</p> <p>This a a very large amount of land allocated for housing and the proposed 640 houses would add to the traffic congestion on the Harnham Rd. It would significantly impact on the highway network and would create a 'bottleneck' of traffic at peak periods coming to already existing development of Harnham, where the road cannot be altered. The fact that the developer is not be burdened with costs to ameliorate the effect of increased traffic most probably will result in no meaningful infrastructure improvements and a large number of extra vehicles using an already busy and congested road adding to the pollution and traffic nuisance of Salisbury.</p> <p>The scale of the number of the development is too large for the site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	164	Consultee mrs anna cochrane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121931		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		housing site allocaitons salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	too many houses on netherhampton road. Huge site, and traffic consequences for harnham terrible. please relocate where traffic can be managed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	165	Consultee Ms Rachel Hunt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1102653		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 1021 Church lane		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The A361 is a blackspot for accidents both “in the dip” where cars currently turn into the country park as well as in the 30mph limit zone further up the hill.</p> <p>Further access points, even with tightened speed restrictions would only make matters worse.</p> <p>The Country Park is also used for running and parking along the A361 between Southwick and Trowbridge is a common cause of delays.</p> <p>Also, the original access to these sites seems to be under review. Whereas the original strategy documents suggest that the Southwick Court site would be accessed from Silver Street Lane (thus sharing incoming traffic between Frome Road and Bradford Road, it now appears that access will be entirely off Frome Road. In addition, if the Church lane site is to be used for affordable housing, then it would seem appropriate for access to be from the end of Studley Green for the extra 40 houses.</p> <p>The Trowbridge Traffic Model which was carried out by PFA Consulting looked in detail at projected traffic for differing sites. It concludes that: Furthermore, the council states that sites at Church lane, Upper Studley and Southwick Court are being considered as they would reduce traffic as residents would walk into Trowbridge rather than using their own vehicles (as opposed to development in nearby villages where cars would need to be used. No evidence has been provided that this would be the case.</p> <p>The walk into town is neither pleasant or particularly safe and increased traffic would make walking into town less attractive. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p> <p>In conclusion, there is not sufficient capacity in place for the, already busy Frome Road to take more traffic, causing additional pollution, noise and disruption to the environment and local listed buildings.</p> <p>The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	166	Consultee Mr John Lindsay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122195		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This plan does not pay heed to the people of trowbridge, embodied in their Town Council, who oppose the plan. The planners consistently have kept growth in Chippenham to a very low level by taking advantage of their position on the planning committee. During the consultation not one member present was from Trowbridge!</p> <p>The number of houses has not been allocated fairly. From the attached charts it can be readily seen that Chippenham has grown little since the beginning of this century. This can only be laid at the door of WWC planners, allocating just 80 homes to Chippenham and 800 to Trowbridge. Chippenham is just a few miles from the M4 and Trowbridge has poor communication. It takes nearly 1 hour to travel from Trowbridge to the M4 at rush hours and just 10 minutes from Chippenham. It is no surprise to learn that a number of our planners live in Chippenham (did they invent NIMBY?).</p> <p>The plan, as proposed today, takes no account of traffic, schools and other amenities. Policing is practically non-existent and traffic speeds in my road are well in excess of 40mph (I was a member of speed watch scheme). Traffic into Trowbridge from the A361 and A365 is already extremely high at rush hour causing jams on the main roads and very high speed on the one communicating road (mine) which has become a rat-run. This can only get worse.</p>				
Attached files (Please see Objective)	4696889				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	167	Consultee Mr Eamon Bundred Person ID: 1122207	Agent Mr Steven Strongman Director Testament Land Company Person ID: 1122206	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.69 Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Open land opposite 45-65 Lower Road excluded from revised boundary Not previously represented in consultation of boundary therefore not considered (Policy CP1) Site on edge of settlement boundary in principle settlement area New proposed boundary to east (Churchfields Ind. Est) + west (existing houses) Policy 4.51 supports housing in urban areas outside development boundary Boundary follows river up to this site, diverts around + back again Part land FZ1 potential 2 houses (STP), not green belt, sustainable location Available + deliverable site for housing NPPF paragraph 17 "need to proactively drive + support development ". Salisbury settlement boundary should be amended so that it includes this land in the boundary + follows the River Nadder bank. This would be in keeping with the amendments to the east + west. Boundary currently proposed is illogical and based on old maps. Its appropriate to amend the boundary line to follow the river. *Map attached showing land + proposed amended boundary*</p>				
Attached files (Please see Objective)	4697044				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It may not be, however, the current boundary line for Salisbury in this location is illogical + based on old maps. There is development on 3 sides, its a sustainable location + there is no sense in excluding it from a principle settlement area.				

Comment ID:	168	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Whole Plan		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The draft Wiltshire Housing Site Allocations Plan is unsound because; it fails to meet the needs of the Trowbridge Community by not identifying sites to provide sufficient houses within the plan period to meet the requirements of the Wiltshire Core Strategy; It fails to justify why the sites chosen are sustainable and fails to justify why the sites discounted are not sustainable; It is ineffective as some of the sites proposed are unsustainable and undeliverable; It is not consistent with national policy, in particular the way it deals with all sites within the proposed Settlement Boundary as being Windfalls when some of those sites have already been identified as having the potential to deliver sustainable development within the Plan Period.			
Attached files (Please see Objective)		4697043			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	169	Consultee Mr Eamon Bundred	Agent Mr Steven Strongman Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122207	Testament Land Company Person ID: 1122206	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A.69 Salisbury	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Open land opposite 45-65 Lower Road excluded from revised boundary Not previously represented in consultation of boundary therefore not considered (Policy CP1) Site on edge of settlement boundary in principle settlement area New proposed boundary to east (Churchfields Ind. Est) + west (existing houses) Policy 4.51 supports housing in urban areas outside development boundary Boundary follows river up to this site, diverts around + back again Part land FZ1 potential 2 houses (STP), not green belt, sustainable location Available + deliverable site for housing NPPF paragraph 17 "need to proactively drive + support development ". Salisbury settlement boundary should be amended so that it includes this land in the boundary + follows the River Nadder bank. This would be in keeping with the amendments to the east + west. Boundary currently proposed is illogical and based on old maps. Its appropriate to amend the boundary line to follow the river. *Map attached showing land + proposed amended boundary*</p>				
Attached files (Please see Objective)	4697044				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It may not be, however, the current boundary line for Salisbury in this location is illogical + based on old maps. There is development on 3 sides, its a sustainable location + there is no sense in excluding it from a principle settlement area.				

Comment ID:	170	Consultee B R Clarkson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 550023	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Ref nos: 298, 261, 292 and 256			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan goes against the aims of the draft North Bradley Parish Council Neighbourhood Plan. Time should have been found by now to read it.</p> <ol style="list-style-type: none"> 1. Site 298 was supposed to be the agricultural barrier strip to North Bradley village, not suitable for housing. 2. Sites 261 and 292 could be available for housing when the approved Yarnbrook bypass is built. 3. Site 256 can be used as its already in a housing estate. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	171	Consultee B R Clarkson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 550023	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Ref nos: 298, 261, 292 and 256			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan goes against the aims of the draft North Bradley Parish Council Neighbourhood Plan. Time should have been found by now to read it.</p> <ol style="list-style-type: none"> 1. Site 298 was supposed to be the agricultural barrier strip to North Bradley village, not suitable for housing. 2. Sites 261 and 292 could be available for housing when the approved Yarnbrook bypass is built. 3. Site 256 can be used as its already in a housing estate. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	172	Consultee Mrs Anthea Beck	Agent Mr Diccon Carpendale Brimble Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122264	Person ID: 1122261	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.68 Mere			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We support the proposed extension of the settlement boundary for Mere along Shaftesbury Road as proposed and shown on the revised settlement boundary map for the town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	173	Consultee Mrs Lesley Hackett	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1106381		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury H3.1, H3.3 and H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The current road set up cannot cope with an extra 1000+ vehicles.</p> <p>Netherhampton Road & Harnham Road are consistently grid locked at rush hours and or school pick up times. These properties will only add to this congestion. Also during the building process there will be an increase in lorries etc which this residential area can barely cope with currently. We have only just had a death on this road involving a lorry.</p> <p>At busy times it is impossible to pull out onto these roads from either side roads or residents drives.</p> <p>Harnham Gyratory does not flow and clogs up other roads crossing Salisbury as it cannot cope with the volume of cars already using it. Extra vehicles will only cause more delays.</p> <p>There are not enough public facilities (local shops/community facilities) within Harnham and this proposal does not address this.</p> <p>Why when so much public money is put on an extensive park and ride system are the new properties being built within the boundary of these car parks. It would be better if the proposed properties were built outside of the current town boundary increasing use of this public transport option.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	174	Consultee Mr Ian Hobday	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122535		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.136			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Despite the assertion in paragraph 5.136 on infrastructure improvement, I believe that the level of traffic which would be generated by the development proposed has not been fully realised. The number of vehicles attempting to use the Netherhampton Road between 0800 and 1000 during the working week already leads to long queues at the round about on the ????. This development would extend the standing traffic right out to the Market site without the road construction I suggest in the paragraph below. Flows along New Bridge Road would lead to major back-ups on the Downton and Blanford Roads further exacerbated by traffic from the proposed development at Rowbarton. No mention is made of additional cycle traffic on the Town Path which would be created by the development where the risk of injury by accidents with cycles is already high. The creation of a southern arc bypass round Salisbury picking up the Southampton, Bournemouth, Blanford and Netherhampton Roads and linking onwards towards the A303, would relieve the Netherhampton road of through traffic and so make the proposed development and so the Plan, sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	175	Consultee Mrs Elizabeth Goater	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122652		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The land should be used for some affordable and social housing but no more that 300 because of the increased amount of traffic on the Netherhampton and Harnham Roads. The partial closure of the river bridge this summer shows how the roads soon get extremely busy and traffic backs up along Harnham Road and Netherhampton Road. The cars, lorries and buses were stationary with their engines idling for up to 10 minutes. The amount of extra houses proposed will increase traffic considerably (most will have one car and some two) and increase air pollution along these roads where school children walk twice a day. The noise will effect the houses along these roads and there will be extra danger for pedestrians.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	176	Consultee Mr Edward Bull	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1122629		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>no public consultation, on change of scale of change on this site previously a reserve site with a smaller number of houses. proper public consultation on issues conducted by planners who know this area . Consideration of traffic and flooding implications not researched. Feasible infrastructure changes need to be proposed and discussed before this plan could be considered .Currently the Harnham /Netherhampton Road is not capable of taking more traffic at peak times, and a development on this scale will add at least another 1000 vehicles. The main road fronting this proposed development was already identified in the 2012 transport strategy as being at capacity. I cannot envisage anything you could do with a road already developed at the "city end" with house on both sides to make this situation different. The high water table in this area is already acknowledged as making significant improvements to the sewerage system very difficult and the surface water "run off " from this site would be directly onto a flood plain (H3.3), which you are also proposing to build on!.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is very difficult to articulate in any meaningful way via a form.				

Comment ID:	177	Consultee Mr Edward Bull	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1122629		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No public consultation, of any real in depth quality.</p> <p>Basic requirements of traffic management and flood risk have not been addressed.</p> <p>I do not think there is any way in which this main road development in conjunction with H3.1 would not totally grid lock local traffic at peak times., The H3.3 already floods regularly in the winter and spring, anyone who lives in Harnham will confirm this..</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	These issues cannot be discussed via a form.				

Comment ID:	178	Consultee Mr S Henderson Woodlands (Mere) Ltd	Agent Mr Paul Oakley Oakley Planning & Conservation	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448866	Person ID: 641659	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.68 Mere settlement boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are instructed by our clients Woodlands (Mere) Ltd to write to you in respect of the above consultation, in particular in respect of the settlement boundary review for Mere.</p> <p>Our clients are the owners of the land shown hatched on the enclosed plan. We are writing to advise you that they have no objections to this land being included within the settlement boundary as proposed within the current review.</p> <p>Please do not hesitate to contact Paul Oakley at this office should you wish to discuss this letter or the settlement boundary for Mere.</p>				
Attached files (Please see Objective)	4884557				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	179	Consultee Joan Jones Chair Friends of Southwick Country Park Person ID: 1122693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1 Summary</p> <p>1.1 The Friends of Southwick Country Park (FoSCP) are concerned about two aspects</p> <p>a) A general increase in the Trowbridge Community Area population leading to increased usage and wear and tear</p> <p>b) Specific effects of and to the three nearby proposed housing sites at Upper Studley, Southwick Court and Church Lane. [Note from officer: - these are detailed in separate representations, numbered 180, 181 and 182, and are not repeated here]</p> <p>1.2 The proposed developments do offer the opportunity of mitigating the adverse effects of the general development and possible improvements are put forward.</p> <p>2 Introduction</p> <p>2.1 Southwick Country Park is an essential part of the recreational facilities in and around Trowbridge. It is used daily by many people for exercise, for social intercourse or for dog walking. Even the latter is beneficial to the health of the dog walker.</p> <p>2.2 On Saturday mornings the main ring path is used by over 300 runners in a Parkrun activity. The number attracted is indicative of the quality of the Country Park environment.</p> <p>2.3 Southwick Country Park is also important to the wildlife of the area. It has become a repository for wildlife relocated from development areas. In particular, hundreds of slow worms have been given a new home there.</p> <p>2.4 An application is under way to redesignate the Country park as a Local Nature Reserve. The indications are that this application will be successful.</p> <p>2.5 It should be noted that the Country Park is an effective "green" buffer between Trowbridge Town and Southwick village</p> <p>3 Park Usage</p> <p>3.1 A survey of some aspects of usage has been carried out by Wiltshire Council on a Saturday in July 2013 . Overall usage was not counted but the results of a sample questionnaire show why people visit the park. Dog walking was the most common activity with just over half. The next common reason was running at just under a third of the total. The Parkrun is held every Saturday morning and now attracts over 300. Other reasons were just walking and visiting the Hope Nature Centre. Lesser reasons were observing wildlife, picnicking and playing games.</p> <p>3.2 If usage by runners is 30% and we have 300 runners every Saturday then other usage is running at around 700 people per day.</p> <p>4 Current Problems</p> <p>4.1 The park is so popular, it is under considerable stress. The main surfaced ring path is deteriorating under increased usage and FoSCoP is to seek funds to upgrade it.</p> <p>4.2 Parking is a problem. The main car park off Frome Road (A362) is surfaced with unbound material and it needs regular attention to deal with potholes.</p> <p>4.3 Parking for the Hope Centre frequently exceeds the capacity of the tarmacked surface and the grass in the field in front suffers from serious rutting in wet weather. A solution to this problem has not yet been identified. However, the problem cannot be ignored.</p>				

	<p>4.4 On Saturday mornings, for around 2 hours, the parking situation is exacerbated by the cars of those attending Parkrun. Parking lines the A362 Frome Road in the area of the Country Park. It has been brought to the attention of the police. Yellow lines may be required in due course.</p> <p>5 Wildlife Considerations</p> <p>5.1 An application is being progressed to achieve "Local Nature Reserve" status for the park. Currently the size of the park is around 140 acres. Although there is a considerable presence of dogs, it is considered that the park will continue to provide good habitat for a wide range of wildlife.</p> <p>5.2 A fear is that increasing human and dog usage will make it less attractive to some species. A considerable amount of help by the planning authority and others will be needed to keep this marvellous resource in good condition.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.</p>
<p>Attached files (Please see Objective)</p>	<p>4698614</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	180	Consultee Joan Jones Chair Friends of Southwick Country Park Person ID: 1122693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.4				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1 The Friends of Southwick Country Park (FoSCP) are concerned about two aspects</p> <p>a) A general increase in the Trowbridge Community Area population leading to increased usage and wear and tear</p> <p>b) Specific effects of and to the three nearby proposed housing sites at Upper Studley, Southwick Court and Church Lane.</p> <p>1.2 The proposed developments do offer the opportunity of mitigating the adverse effects of the general development and possible improvements are put forward.</p> <p>3 Park Usage</p> <p>3.1 A survey of some aspects of usage has been carried out by Wiltshire Council on a Saturday in July 2013 . Overall usage was not counted but the results of a sample questionnaire show why people visit the park. Dog walking was the most common activity with just over half. The next common reason was running at just under a third of the total. The Parkrun is held every Saturday morning and now attracts over 300. Other reasons were just walking and visiting the Hope Nature Centre. Lesser reasons were observing wildlife, picnicking and playing games.</p> <p>3.2 If usage by runners is 30% and we have 300 runners every Saturday then other usage is running at around 700 people per day.</p> <p>4 Current Problems</p> <p>4.1 The park is so popular, it is under considerable stress. The main surfaced ring path is deteriorating under increased usage and FoSCoP is to seek funds to upgrade it.</p> <p>4.2 Parking is a problem. The main car park off Frome Road (A362) is surfaced with unbound material and it needs regular attention to deal with potholes.</p> <p>4.3 Parking for the Hope Centre frequently exceeds the capacity of the tarmacked surface and the grass in the field in front suffers from serious rutting in wet weather. A solution to this problem has not yet been identified. However, the problem cannot be ignored.</p> <p>4.4 On Saturday mornings, for around 2 hours, the parking situation is exacerbated by the cars of those attending Parkrun. Parking lines the A362 Frome Road in the area of the Country Park. It has been brought to the attention of the police. Yellow lines may be required in due course.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>6.3 Development 1021 Church Lane</p> <p>6.3.1 The proposals suggest that access should be directly off A361 to avoid extra traffic on Church Lane.</p> <p>6.3.2 The same considerations apply here about Parkrun parking.</p> <p>The development should provide a small car park for Country Park users and a footbridge over the Lambrok stream to provide pedestrian and wheelchair access to the Park.</p> <p>7 Conclusions</p>				

	7.1 There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.
Attached files (Please see Objective)	4698615
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	181	Consultee Joan Jones Chair Friends of Southwick Country Park Person ID: 1122693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.5				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3 Park Usage</p> <p>3.1 A survey of some aspects of usage has been carried out by Wiltshire Council on a Saturday in July 2013 . Overall usage was not counted but the results of a sample questionnaire show why people visit the park. Dog walking was the most common activity with just over half. The next common reason was running at just under a third of the total. The Parkrun is held every Saturday morning and now attracts over 300. Other reasons were just walking and visiting the Hope Nature Centre. Lesser reasons were observing wildlife, picnicking and playing games.</p> <p>3.2 If usage by runners is 30% and we have 300 runners every Saturday then other usage is running at around 700 people per day.</p> <p>4 Current Problems</p> <p>4.1 The park is so popular, it is under considerable stress. The main surfaced ring path is deteriorating under increased usage and FoSCoP is to seek funds to upgrade it.</p> <p>4.2 Parking is a problem. The main car park off Frome Road (A362) is surfaced with unbound material and it needs regular attention to deal with potholes.</p> <p>4.3 Parking for the Hope Centre frequently exceeds the capacity of the tarmacked surface and the grass in the field in front suffers from serious rutting in wet weather. A solution to this problem has not yet been identified. However, the problem cannot be ignored.</p> <p>4.4 On Saturday mornings, for around 2 hours, the parking situation is exacerbated by the cars of those attending Parkrun. Parking lines the A362 Frome Road in the area of the Country Park. It has been brought to the attention of the police. Yellow lines may be required in due course.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>Development 3260 Upper Studley and 3565 Southwick Court</p> <p>6.2.1 Both of these are on the East side of A361, Frome Road, opposite the Country Park.</p> <p>6.2.2 There have been calls for waiting restrictions on A361 and if the developments go ahead it is highly likely that restrictions will be included. In which case runners attending Parkrun will most likely park inside the new developments. In such a location they should be less obstructive and dangerous than on the main road. The developments should be designed to accommodate this Saturday morning parking without inconveniencing the residents and attracting calls for more yellow lines.</p> <p>6.2.3 At least one of the development accesses should be a roundabout to control traffic speeds on the A361. In addition a pedestrian and cycle crossing facility should be included on A361.</p> <p>6.2.4 Everything possible should be done to reduce car travel to the Country Park and a landscaped walk and cycle route should be included through the Southwick Court scheme to connect with North Bradley via Axe and Cleaver Lane. A link with Silver Street Lane should be included. The aim should be to make these routes feel like an extension of the Country Park.</p>				

	There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.
Attached files (Please see Objective)	4698616
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	182	Consultee Joan Jones Chair Friends of Southwick Country Park Person ID: 1122693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3 Park Usage</p> <p>3.1 A survey of some aspects of usage has been carried out by Wiltshire Council on a Saturday in July 2013 . Overall usage was not counted but the results of a sample questionnaire show why people visit the park. Dog walking was the most common activity with just over half. The next common reason was running at just under a third of the total. The Parkrun is held every Saturday morning and now attracts over 300. Other reasons were just walking and visiting the Hope Nature Centre. Lesser reasons were observing wildlife, picnicking and playing games.</p> <p>3.2 If usage by runners is 30% and we have 300 runners every Saturday then other usage is running at around 700 people per day.</p> <p>4 Current Problems</p> <p>4.1 The park is so popular, it is under considerable stress. The main surfaced ring path is deteriorating under increased usage and FoSCoP is to seek funds to upgrade it.</p> <p>4.2 Parking is a problem. The main car park off Frome Road (A362) is surfaced with unbound material and it needs regular attention to deal with potholes.</p> <p>4.3 Parking for the Hope Centre frequently exceeds the capacity of the tarmacked surface and the grass in the field in front suffers from serious rutting in wet weather. A solution to this problem has not yet been identified. However, the problem cannot be ignored.</p> <p>4.4 On Saturday mornings, for around 2 hours, the parking situation is exacerbated by the cars of those attending Parkrun. Parking lines the A362 Frome Road in the area of the Country Park. It has been brought to the attention of the police. Yellow lines may be required in due course.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>Development 3260 Upper Studley and 3565 Southwick Court</p> <p>6.2.1 Both of these are on the East side of A361, Frome Road, opposite the Country Park.</p> <p>6.2.2 There have been calls for waiting restrictions on A361 and if the developments go ahead it is highly likely that restrictions will be included. In which case runners attending Parkrun will most likely park inside the new developments. In such a location they should be less obstructive and dangerous than on the main road. The developments should be designed to accommodate this Saturday morning parking without inconveniencing the residents and attracting calls for more yellow lines.</p> <p>6.2.3 At least one of the development accesses should be a roundabout to control traffic speeds on the A361. In addition a pedestrian and cycle crossing facility should be included on A361.</p> <p>6.2.4 Everything possible should be done to reduce car travel to the Country Park and a landscaped walk and cycle route should be included through the Southwick Court scheme to connect with North Bradley via Axe and Cleaver Lane. A link with Silver Street Lane should be included. The aim should be to make these routes feel like an extension of the Country Park.</p>				

	There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.
Attached files (Please see Objective)	4698617
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	183	Consultee Mr William Roper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122632		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This proposal has not been objectively developed. It makes the assumption that because Salisbury is a principal settlement it can absorb the development which is proposed. This has been done without considering the geography of Salisbury which is severely constrained by being sited at the confluence of 4 rivers and surrounded by quite steep slopes. The City of Salisbury is built entirely to the north of the river Avon. The only crossing points on the river Avon are the bridges on Newbridge Road and at Wilton. Salisbury north of the river Avon is full otherwise this plan would have identified sites there for development.</p> <p>The Core Strategy makes the rather odd decision only to consider development within existing settlement boundaries. This means that the only option is to shoehorn the development for South Wiltshire into Salisbury. The Plan takes the easy way out by adjusting the boundaries to include a site to the south of the City, which is not part of Salisbury at all but is a greenfield site in open country between the villages of West Harnham and Netherhampton. The plan cannot be considered to be justified because it has not considered reasonable alternatives such as a new settlement to the north of Salisbury close to good roads and railways and close to developing industry (Porton/Middle Wallop etc) . The Plan cannot be considered effective because it probably cannot be delivered. It is linked to the plan to decant business from Churchfields. This has been ongoing for some time with no sign of any progress at all. The Harnham Business Park remains empty and little wonder. There can be few reasons why a business would want to move from a site close to the city centre to a site over 2 miles from the city separated by a poor transport link. There seems little prospect of this part of the plan coming to fruition within the timescales envisaged. The Core Strategy should be revised to allow consideration of development outside defined settlement boundaries. This would allow an alternative proposal of a new settlement to the north of Salisbury to be considered.</p> <p>The whole of this consultation process has been opaque. It has been difficult to wade through the large amount of documentation to find the relevant bits. Is it cynical of me to suggest that the public consultation in Salisbury was held in the middle of the summer holidays in a deliberate attempt to reduce attendance?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	184	Consultee Mr Kim Williams	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122741	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Land on the Trowridge side of Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I object to the land to Trowbridge side of Elizabeth Way being allocated for Housing. this would cause adverse environmental impacts, and loss of recreational areas, as well increased traffic flow on Elizabeth Way to such an extent to render the "Elizabeth Way" by-pass ineffective. Instead I believe that housing should be allocated to the former Bowyers site in Trowbridge, an empty brown field site near to the railway station.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	185	Consultee Mr Christopher Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122587	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111),SA objective 2,SA objective 7,SA objective 10,SA objective 11,			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111)</p> <p>In response to the Wiltshire Housing Site Allocations Plan I would like to raise the following objections to the development proposals: SA objective 2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings. Given that the Government has declared that 'brown field sites' should be used in preference to 'green field sites' for future housing developments, the adjacent Harnham Business Park has remained undeveloped for some years. The proposed site is a similar size to the one developed some years ago on the Netherhampton Road between Harnham Business Park and Montague Road. This type of limited development targeted at local requirements using a 'brownfield' location would be far more acceptable. The proposal for the proposed site to be a mixture of housing and industrial accommodations fails to recognise that the adjacent brownfield Harnham Business Park has still not been developed despite being vacant for many years.</p> <p>The need for additional housing is well recognised however, the key requirement is to meet local needs by building affordable housing in the right place. A large development on the south of the Netherhampton Road on the outskirts of Harnham does not meet these requirements and is not supported by the local residents. Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. For a large scale housing requirements, consideration should be given to enhancing current development sites, possibly under the guise of a new 'Garden City' status, where supporting infrastructure can be created without adversely impacting on local residents. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	186	Consultee Francesca Vowles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I feel I must object in the strongest terms about the following....</p> <p>Building permissions have been given for a number of sites totalling 5892 new homes in Trowbridge, and not one has been built. Yet planners are now looking at green field sites to locate more houses. Why are the developers not using the sites they have already been given permission for, or is it because bats are holding up building work! Planners and developers knew of the bats, if it's so difficult to put all the procedures in place to protect the bats why was permission given in the first place. This is no excuse to look at other sites before you have dealt with the ones you have.</p> <p>I do feel that the planners are letting Trowbridge down, I know we need new homes and the fact that Wiltshire county council has told Trowbridge to find sites for a further 700 does not put them in a good light. The population of Trowbridge is approx 40000 and with all this new housing it will increase by approx 25 per cent. So allowances must be made for schools and medical facilities along with the emergency services.</p> <p>At the moment that Trowbridge a lovely small town is being badly let down by its council.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	187	Consultee Francesca Vowles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.48			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I noted that you intend to change the boundary to accommodate the new housing estate on what you are calling Southwick Court. If you do so then this site won't be in Southwick so can't really be called Southwick Court. Then you will have Southwick Country Park facing a Trowbridge housing estate, it all seems muddled and confusing. I don't think you have thought the change of boundary through properly.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	188	Consultee Francesca Vowles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I as well as others have noted a number of traffic counts have been placed around Trowbridge, along Frome Road, New Town, County Way and Wingfield Road, but not on Bradley Road. You have placed two either side of the roundabout for the White Horse Business Park on the A363. I fail to see how this is going to tell you how much traffic uses Bradley Road. This noted on the 8th July. I live on Bradley Road and know only too well how busy it can get. Yet traffic counts have been in place during the summer and school holidays. I suggest if you really want to get an idea of traffic in Trowbridge you place the counts during the autumn in school term time. If housing goes ahead at North Bradley site 298, Drynham Lane site 613 and 248 and on Southwick Court site 3565, and don't forget the old council site on Bradley Road all this extra traffic will use Bradley Road. Bradley Road is already extremely busy, getting off our drives is a nightmare, and with all the extra traffic you intend to pass through it is only going to get much worse. The houses are old along Bradley Road, with more traffic passing through who knows what damage this could do to our houses!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	189	Consultee Francesca Vowles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I as well as others have noted a number of traffic counts have been placed around Trowbridge, along Frome Road, New Town, County Way and Wingfield Road, but not on Bradley Road. You have placed two either side of the roundabout for the White Horse Business Park on the A363. I fail to see how this is going to tell you how much traffic uses Bradley Road. This noted on the 8th July. I live on Bradley Road and know only too well how busy it can get. Yet traffic counts have been in place during the summer and school holidays. I suggest if you really want to get an idea of traffic in Trowbridge you place the counts during the autumn in school term time. If housing goes ahead at North Bradley site 298, Drynham Lane site 613 and 248 and on Southwick Court site 3565, and don't forget the old council site on Bradley Road all this extra traffic will use Bradley Road. Bradley Road is already extremely busy, getting off our drives is a nightmare, and with all the extra traffic you intend to pass through it is only going to get much worse. The houses are old along Bradley Road, with more traffic passing through who knows what damage this could do to our houses!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	190	Consultee Francesca Vowles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site at Southwick is an old site and has very old hedges which have protection rights by law.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	191	Consultee Julie Murnane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124558	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to register my objection to the building of yet more houses in the Harnham area of Salisbury.</p> <p>I live of the Rowbarrow development and the traffic situation is already atrocious. It can take an hour travel time, just to do some food shopping. On several occasions an ambulance has tried to get through the queuing traffic and this has proved very difficult despite all drivers attempting to make way for the ambulance. Add more houses and therefore more cars and the situation will become untenable.</p> <p>We also have Salisbury District Hospital and the ambulance station on this side of Salisbury and Patients lives could be put in danger due to the delay in being able to reach the hospital facilities.</p> <p>Please reconsider,</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	192	Consultee C G Fry C G Fry & Son Ltd	Agent Jeff Richards Office Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122879	Turley Associates Person ID: 1122877	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.22 Calne settlement boundary.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Please see attached letter, which concludes: C G Fry's site, by virtue of its extant implemented consent, clearly meets the criteria in the Council's settlement boundary review methodology for inclusion within the amended settlement boundary. We request that the proposed plan therefore be amended to include C G Fry's site within the settlement boundary of Calne given there is a clear certainty that this development will come forward.				
Attached files (Please see Objective)	4704539				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	193	Consultee Peter and Gillian Sherry Person ID: 447691	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other			Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Netherhampton Road, Salisbury		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Regarding the proposed development on the Netherhampton Road: Our main concern regarding this development is the impact on traffic flow and the subsequent environmental impact from the inevitable increased traffic congestion on the Netherhampton,, Harnham and Newbridge Roads which are already at capacity at certain times of the day. Any development in the Salisbury area will always be constrained by the cancellation of the Salisbury bypassand the lackof any further investment to improve the road infrastructure, despite the increase in the city’s population in the subsequent years. Even without any further new build many roads and junctions are beyond capacity at different times of the day eg the ring road St Marks to College Roundabout, ring road Exeter Street roundabout to College roundabout, and the A36T Southampton Road is often more blocked than free flowing and not just during ‘rush hours’.</p> <p>Netherhampton and Harnham Roads feed onto the Harnham gyratory, another bottleneck, which feeds onto Newbridge Road, which feeds on to the ring road. Newbridge Road, is by your own admission from a planning application of 45 houses (Planning Application3435) on the flood plain at Britford “unable to take additional traffic”. How then can the additional traffic from the proposed application for 640 houses (S1028) and 100 houses (S1027) in the Netherhampton Road be acceptable and be assumed to have no impact? Also, if the Salisbury Transport Strategy 2012 reported that the Harnham gyratory was already working close to or at capacity how can it now be acceptable to approve the increased traffic flow from 740 houses even if they only have one extra car each? In the same report it was also noted that the Park Wall junction, at the other end of Netherhampton Road was also operating at or close to capacity in 2012.</p> <p>The consultation says that Transport network improvements will be necessary to accommodate the scale of the development. Without MAJOR road infrastructure development before the housing proposals are considered the Nethethampton Road and Harnham Road (A3094) will become a polluting nightmare for its residents, especially as more lorries are using the A3094 as a through route instead of the A36 Wilton Road. Councils are being urged by Government to improve the flow of traffic to avoid air pollution so tinkering at the edges promoting cycle tracks and footpaths is not a solution. The road traffic needs to be reduced or removed, not increased causing yet more traffic jams and air pollution.</p> <p>The Netherhampton and Harnham Roads through Harnham cannot be widened for a major part of their length so the only possible alleviation measures would have to increase the through put of traffic, remove the bottlenecks at both ends of the road and the bottle neck that is the College roundabout.</p> <p>We know that many Harnham residents like us already use the buses, cycle or walk into the city centre and we agree that this should be encouraged but Harnham has no major facilities, no supermarket, leisure facilities, park and ride. All the supermarkets, tennis courts, leisure facilities are to the north or east of the city. The majority of the new homeowners will need to drive.</p> <p>The residents of Salisbury deserve better infrastructure or their quality of life and health will diminish even more. Baroness Scott is reported as saying “if you tell developers we want more money for infrastructure they will walk away and there will be no housing”. There should be no housing in inappropriate areas if the impact is so detrimental . Housing at any price is not the answer.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	194	Consultee Peter and Gillian Sherry	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447691	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Secondly we are concerned about the further loss of prime agricultural land when brown field sites should be given first consideration.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	195	Consultee Mrs Victoria Brown Person ID: 1106487	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express concerns about and object to site 298 being included as part of the Wiltshire Council Housing Allocations. I do not believe the use of this site for development is a sound decision when referring to section 182 of the National Planning Policy Framework (NPPF), it is not justified or consistent with national planning policy. Specifically I do not consider the use of this site can be justified against sections 109, 110 and 111 of the NPPF.</p> <p>I would like to focus on SA objective 1. Protect and enhance all biodiversity and geological features and avoid irreversible losses.</p> <p>The details contained in this section of the Annex for site 298 begin to evidence what I and other local residents already know. This patch of land is vital for the biodiversity of the local area. This patch of green is a haven for wildlife in the sprawling town of Trowbridge which seems to be absorbing rural villages like North Bradley. Notwithstanding the protected species (slow worms, grass snakes and great crested newts, Bechstein's bats); other bat species, a vast array of insect life, hedgehogs, green woodpecker and a significant range of birds use this area for habitat and food. Building on this site, even if the hedgerows and trees are preserved, will fragment populations and destroy the majority of the food available in the ecosystem. The wildlife will move away from any area populated by people with the associated noise and lights. Despite having White Horse Business Park on one side and Woodmarsh on the other the area is, in the main, protected from artificial light and is therefore a haven for wildlife at night time. On this note, as it is already known that Bechstein's bats are using the site it would seem pertinent for a full bat survey carried out before the site is allocated for housing. It is clear that this area of land is used as a corridor by wildlife to travel from the Axe and Cleaver Lane area to the South of Trowbridge where Biss and Green Lane woods lie. Loosing this area will result in pushing the urban environment of Trowbridge all the way out to the A350 and wildlife would have go around the whole village of North Bradley and cross the A350 to move between the sites.</p> <p>What is extremely concerning is this this site is being considered when, due to constraints, it will only be able to contain 150 houses when an area of land this size can take 338 properties. The habitat will be destroyed so that the land can be used for houses at half the density other sites.</p> <p>It is accepted that some land does need to be used for residential development and that the NPPF needs to be considered in context as a whole document, not isolated sections. However, I do not consider the use of this site for development consistent with the NPPF, specifically Section 11: Conserving and enhancing the natural environment.</p> <p>The use of the site is not justified under policy 109 because a large area of land (big enough for 338 dwellings) with high ecological value, containing a significant amount of ecosystem services would be destroyed for the benefit of only 150 homes. There are other sites where housing at a more appropriate density can be installed without such a significant amount of damage to the biodiversity. The government is committed to halting the decline in biodiversity but the use of this site will destroy this valuable area which provides food and habitat for a complex ecosystem struggling to survive around the urban sprawl of Trowbridge.</p> <p>Policy 110 states that plans to meet development needs should allocate land with the least environmental or amenity value. Given the protected species identified and ecosystem services being provided this area of land should not be allocated for development. Some of the site has been</p>				

	<p>used as agricultural paddocks since medieval times. It does not appear that the land has been given over to intensive arable farming in recent history; without regular ploughing and compression with large agricultural vehicles the soil structure, microorganisms, insects and other fauna will have established, complex interactions that have developed over hundreds of years. This quality of soil habitat is not found on land that has been intensively farmed and forms the basis for the rest of the flora and fauna that thrive on the land. There are alternative sites, with less environmental value where a higher density of housing can be implemented. The use of this land is not compliant with policy 110 of the NPPF. Remove site 298 from the housing allocations document.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	196	Consultee Mr. Paul Cunningham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 862429		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I oppose the plans for the following reasons NOT FAIR OR PROPORTIONATE There is no “nimbyism” behind our objection. The constructive manner in which all residents of Netherhampton have engaged in the discussion with the Wilton Estate regarding the planning application for development at Netherhampton Farm demonstrates that there is acceptance of the need for new housing provided that its scale is in keeping with the existing settlement and can be sustained by the local infrastructure. Netherhampton has approximately 60 dwellings and this new development at Netherhampton Farm will increase that number by over 30%. This feels like a fair share of the overall commitment facing South Wilshire and Wiltshire generally. The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury. The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary? The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible. Consider the transport, Green Infrastructure and all other issues properly BEFORE making housing allocations</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	197	Consultee Mr Paul Cunningham Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Netherhampton Parish Council Person ID: 1122902		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The Parish Council has sought the input of its residents since the Draft Housing Allocation Plan was announced. Without exception, the residents are opposed to the proposed sites along Netherhampton Road. At an open Parish Meeting on 4th September this consensus was confirmed. Netherhampton residents oppose the plans for the following reasons</p> <p>NOT FAIR OR PROPORTIONATE</p> <p>There is no “nimbyism” behind our objection. The constructive manner in which all residents of Netherhampton have engaged in the discussion with the Wilton Estate regarding the planning application for development at Netherhampton Farm demonstrates that there is acceptance of the need for new housing provided that its scale is in keeping with the existing settlement and can be sustained by the local infrastructure. Netherhampton has approximately 60 dwellings and this new development at Netherhampton Farm will increase that number by over 30%. This feels like a fair share of the overall commitment facing South Wilshire and Wiltshire generally.</p> <p>The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury.</p> <p>The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary?</p> <p>The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible.</p> <p>Consider the Transport, GI and other impacts carefully BEFORE making housing allocations.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		As Chair of the parish in which huge allocations are proposed it would seem unreasonable to say the least for me not to be able to participate in any oral part of the examination in order to represent the very strongly held view of our residents.			

Comment ID:	198	Consultee Mr Warren Wade	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 893748	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Further to our objection emails sent on 16 February 2016 and 16 September 2016 (copies of emails below). We wish to make our objection to the fact that so many greenfield sites are included within the Housing Site Allocations Plan.</p> <p>This objection email relates specifically to the land known as the 'Hilperton Gap' (Land west of Elizabeth Way) being included within the Housing Site Allocations Plan for housing development, covering the land in its entirety from the Elizabeth Way road through to Horse Road, Wyke Road and Victoria Road.</p> <p>We are writing to object and our comments are made below:</p> <p>Wiltshire Housing Sites Allocations Plan: A high percentage of proposed housing for the county appears to have been allocated to the Trowbridge and Southwick areas. It is also noted that for proposed housing mainly greenfield sites rather than brownfield sites are listed - this really is not acceptable. The 'Bowyers' site lies derelict. This space could well be used for a high percentage of the allocated housing requirement referred to for the Trowbridge area. Rather than the site being listed as a mixed site for residential and commercial opportunities, it would be better placed for 100% housing reducing the need to build on greenfield sites. The site has excellent rail routes for commuting (and reduces the need for people to own their own transport), it is within walking distance to the town's facilities with good access to the canal tow paths for people's health & wellbeing. We cannot understand why the Bowyers site isn't the first site that Wiltshire Council looks at to fulfil its housing requirements for the Trowbridge area.</p> <p>The need to safeguard the countryside and the need to conserve trees and open land: The countryside surrounding Trowbridge, including Southwick are the last remaining green spaces to act as a buffer – without making Trowbridge one huge town encompassing many of our surrounding villages.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	199	Consultee Mrs G A Gill Colerne Parish Council	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 390446	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.31 Colerne Settlement Boundary review			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	With reference to the recent proposed settlement boundary consultation, please note that Colerne Parish Council submitted to Wiltshire Council in 2014 plans for a revised settlement boundary for Colerne Parish following an indepth consultation period with both Wiltshire Council and the local community. These plans (see attachments) were developed via discussions with Geof Winslow, Spatial Planning, Wiltshire Council who acknowledged acceptance of them. (email attached) For this reason the Parish Council were suprised to find that the present plans shown in the 2017 consulation document do not reflect the 2014 changes agreed upon. We would welcome a meeting to discuss how we can move forward.				
Attached files (Please see Objective)	4698951 / 4698954				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	200	Consultee Ms R Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122926	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing in opposition to the proposal to build houses on land adjacent to Southwick Court. The use of fields to walk in is not only good exercise but offers a wide open space away from cars and fumes - a place to get away for a while from the often busy and stressful lives so many people live now. Not everyone owns a car or can afford to travel away from the built up areas which they inhabit. How enriching it is for many people to watch birds fly across the fields at low level.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	201	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Paragraph 6.28 is incorrect. [of the Westbury Community Area Topic Paper] With reference to 40 dwellings, 'This wouldcontribute towards identified needs in the most recent Parish Housing Needs Survey (PHNS). It doesn't, it far exceeds the numbers identified in the March 2014 Report, Page 14				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	202	Consultee Mr Frank Winfield	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122960		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The document as a whole			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I believe that: the Plan is not consistent with national policy because Wiltshire County Council has failed to give proper weight to brown field sites. Wiltshire County Council 's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes Wiltshire County Council should re-assess the requirement for new housing stock, particularly where this would impinge on greenfield sites and overload existing infrastructure. In addition, all suitable brownfield sites should be fully utilised before any new development is permitted on greenfield sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	203	Consultee Mrs Ann Leggett	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447936		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to protest most strongly to the council committee considering the proposal to build 840 new homes on Rowbarrow estate & in Netherhampton.</p> <p>I've lived at 119 Harnham Road for about 30 years and during that time have experienced a threefold increase in the volume of traffic using Harnham Road & the gyratory junction. If approved, Harnham Road, leading to Salisbury, would take a huge amount of extra traffic from the homes in Netherhampton, as Salisbury has so many more amenities than Wilton. Harnham Road already has difficulty absorbing the current volume of vehicles, let alone a possible 840 additional cars. There would be many more journeys and deliveries in the neighbourhood and there is simply not the space for this increase in activity. Already there are times when the traffic comes to a standstill and any accidents, blockages or road closures already cause great difficulty to residents, commuters and delivery/goods vehicles. (As was the case on Tuesday August 15th. when a severe accident occurred.)</p> <p>Please be sure to register this protest. Unfortunately I cannot attend the public meeting on Sep. 6th. in Harnham but hope that many people support it and that their/our feelings are acknowledged.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	204	Consultee Ian Seager Person ID: 1122975	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
					Do you consider the draft WHSAP is sound?
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.40 Seend Settlement Boundary				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The former Bell Inn, at Appendix 3 grid squares G8 and F8, is a Grade II listed building. The extended western car park of this property has been included within the settlement as part of the proposed boundary change. If the proposed boundary change was to stand this would facilitate future unnecessary and unwanted housing development of the car park in proximity to a Grade II historical asset. This would be in opposition to the policies of Seend's emerging neighbourhood plan. Within that plan this land relates to, and facilitates, a designated significant view within a landscape gap from Seend to the open countryside to the south west of the Seend settlement. The Seend Parish Neighbourhood Plan Landscape Analysis Map shows the identified view in that landscape gap. Public consultation on the landscape element of the Seend neighbourhood plan has already taken place. Allowing the proposed change to stand will undermine the value of neighbourhood planning and create unnecessary boundary amendment work for both Wiltshire Council and the neighbourhood plan steering group.</p> <p>The extended area of the former Bell Inn car western park should be excluded from the proposed boundary change and the existing boundary line retained. Boundaries will remain subject to review and parishioner support within the ongoing process of the Seend neighbourhood plan. Local engagement from people who know the settlement supersedes the weak desktop methodology for determining the built environment of Seend. In the case of Seend, doing nothing in terms of boundary change will keep the site allocations plan compliant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	205	Consultee Mr & Mrs Trout	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122982	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide : The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	206	Consultee Mr & Mrs Trout	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122982	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows: In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	207	Consultee Mr & Mrs Trout	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122982	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy</p> <p>A core strategy or local plan is considered "sound" when it is consistent with national policy.</p> <p>Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide :</p> <p>The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment.</p> <p>I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p> <p>Maintaining the local environment Sites 3620</p> <p>It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds. In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	208	Consultee Mr & Mrs Trout	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122982	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy</p> <p>A core strategy or local plan is considered "sound" when it is consistent with national policy.</p> <p>Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide :</p> <p>The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment.</p> <p>I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p> <p>Maintaining the local environment Sites 3620</p> <p>It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	209	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No										
		Trowbridge Town Council		Do you consider the draft WHSAP is sound?	No										
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared											
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified											
				Effective											
				Consistent with national policy											
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>the proposed She proposal does not meet the definition of Windfalls in the NNPf because it ignores all sites within the proposed Settlement Boundaries which have been identified by Wiltshire Council as capable of delivering houses in the plan period and has incorrectly classified these houses as Windfalls.</p> <p>Such specifically identified sites inside the proposed Settlement Boundaries should be itemised and included in the HSAP and not included in the Windfalls figure, including:</p> <p>those located within the Trowbridge Settlement Boundary:</p> <table border="0"> <tr> <td>Former District Council Offices, Bradley Road</td> <td>70 dwellings</td> </tr> <tr> <td>East Wing/Trowbridge Hospital/Margaret Stancomb School</td> <td>300 dwellings</td> </tr> <tr> <td>Bowyers</td> <td>250 dwellings</td> </tr> <tr> <td>Ashton Street Centre</td> <td>70 dwellings</td> </tr> <tr> <td>The Pavillions, White Horse Business Park</td> <td>130 dwellings</td> </tr> </table> <p>The proposal is not positively prepared because it fails to recognise the fundamental issue that Wiltshire Council already knew that Ashton Park was not going to deliver the requirement of the Trowbridge Area when the Core Strategy was adopted and therefore the Trowbridge Area should have its overall requirement reduced.</p> <p>The proposal is not justified because three of the sites proposed in the Trowbridge area are contrary to the Core Strategy, whilst other sites which can deliver more houses have been discounted for unjustified reasons.</p> <p>The proposal is not effective, because out of a suggested requirement of 2020 houses for Trowbridge, Wiltshire Council has failed to identify a plan to deliver 1220 of those houses. Trowbridge Town Council has suggested an alternative plan which meet all of this requirement, 1502 in Trowbridge and the remainder in other HMA locations.</p> <p>The proposal is not consistent with national policy, it does not adequately deliver the quantum suggested for Trowbridge and the N&WHMA and therefore Wiltshire as a whole and it incorrectly identifies all sites in Settlement Boundaries as Windfalls.</p> <p>Remove sites 263/297, 298 and 3565 (535 houses) which are contrary to the Wiltshire Core Strategy to maintain open countryside to protect the character and identity of Hilperton, North Bradley and Southwick as a separate communities.</p> <p>Add sites 256, 292 and 3247 (547 houses) which are sustainable and are in accordance with the Wiltshire Core Strategy and can be delivered without significant adverse impacts on ecology.</p> <p>Add specifically identified sites within the proposed Settlement Boundaries (820 houses).</p> <p>Please see attached PDF version of our full submission.</p>					Former District Council Offices, Bradley Road	70 dwellings	East Wing/Trowbridge Hospital/Margaret Stancomb School	300 dwellings	Bowyers	250 dwellings	Ashton Street Centre	70 dwellings	The Pavillions, White Horse Business Park	130 dwellings
Former District Council Offices, Bradley Road	70 dwellings														
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Bowyers	250 dwellings														
Ashton Street Centre	70 dwellings														
The Pavillions, White Horse Business Park	130 dwellings														
Attached files (Please see Objective)	4699451														

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Trowbridge Town Council wishes to participate in the oral part of the examination because as a town council we have a long term policy of supporting housing growth and sustainable development for our community, we have fully supported the Core Strategy throughout its development and adoption and we now believe that Wiltshire Council is failing to implement the Core Strategy through their proposals, which will result in unsustainable development around Trowbridge and damage to the growth of Trowbridge and the economic development of the town.

Comment ID:	210	Consultee mr david paterson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122659		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figures 5.19 H3.1, Fig 5.21 H3.3, Fig5.22 H3.4, Fig5.220 H3.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>An independent Inspector of a previous Core Strategy(?) supported local information concerning a proposal for about 400 new dwellings in Harnham for reasons including the lack of capacity on highways access.</p> <p>Salisbury's main roads and our five rivers have not changed, nor have the bridges that cross them since since that decision. However many more houses have been developed on higher ground since then. However the highways which were considered at capacity then, are now regularly congested and are often at a standstill.</p> <p>The nod to maintaining a healthy environment in this draft plan is hopelessly inadequate.</p> <p>The provision of medical services is also inadequate to cope.</p> <p>The flood plain that is Fig 5.21 H3.3 will continue to concern present residents adjacent to Waldrons Farm</p> <p>Building will only take place above the level of flood plains.</p> <p>Infrastructure and highways improvements will precede any planning consents.</p> <p>New towns will be considered to meet our housing crisis.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	211	Consultee Mr G Gilbert	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 446026		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Ref to proposed 740 houses on Netherhampton Road, Harnham Road and in East Harnham at Rowbarrow. This would increase vehicles by over 1,000 in what is already a congested area, bearing in mind, neither Netherhampton Road was a "B" road originally. With all extra traffic, safety on the routes would be jeopardized.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	212	Consultee Mr G Gilbert	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 446026		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Ref to proposed 740 houses on Netherhampton Road, Harnham Road and in East Harnham at Rowbarrow. This would increase vehicles by over 1,000 in what is already a congested area, bearing in mind, neither Netherhampton Road was a "B" road originally. With all extra traffic, safety on the routes would be jeopardized.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	213	Consultee Mr G Gilbert	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 446026		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.4		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Ref to proposed 740 houses on Netherhampton Road, Harnham Road and in East Harnham at Rowbarrow. This would increase vehicles by over 1,000 in what is already a congested area, bearing in mind, neither Netherhampton Road was a "B" road originally. With all extra traffic, safety on the routes would be jeopardized.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	214	Consultee Mr G Gilbert	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446026	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Ref to proposed 740 houses on Netherhampton Road, Harnham Road and in East Harnham at Rowbarrow. This would increase vehicles by over 1,000 in what is already a congested area, bearing in mind, neither Netherhampton Road was a "B" road originally. With all extra traffic, safety on the routes would be jeopardized.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	215	Consultee Francesca Vowles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I feel I must object in the strongest terms about the following....</p> <p>I as well as others have noted a number of traffic counts have been placed around Trowbridge, along Frome Road, New Town, County Way and Wingfield Road, but not on Bradley Road. You have placed two either side of the roundabout for the White Horse Business Park on the A363. I fail to see how this is going to tell you how much traffic uses Bradley Road. This noted on the 8th July. I live on Bradley Road and know only too well how busy it can get. Yet traffic counts have been in place during the summer and school holidays. I suggest if you really want to get an idea of traffic in Trowbridge you place the counts during the autumn in school term time. If housing goes ahead at North Bradley site 298, Drynham Lane site 613 and 248 and on Southwick Court site 3565, and don't forget the old council site on Bradley Road all this extra traffic will use Bradley Road. Bradley Road is already extremely busy, getting off our drives is a nightmare, and with all the extra traffic you intend to pass through it is only going to get much worse. The houses are old along Bradley Road, with more traffic passing through who knows what damage this could do to our houses!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	216	Consultee Mrs Lynne Greenhalgh	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123223		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Until the traffic problems are resolved in the East and West Harnham areas of Salisbury (i.e. Remodel the Harnham Gyrotory, Downton Road, Newbridge Road , Coombe Road. And A3084 Harnham and Netherhampton Road) the proposal to build 840 houses on Netherhampton Road and Rowbarrow sites) is nonsensical and will make the lives of alof existing and potential new Harnham and Netherhampton residents a nightmare. These roads are already at capacity and in peak times in themorning , after the Harnham schools have finished and the evening less than 10 vehicles get through the traffic lights at The Harnham gyrotory from the A3094 road before the lights change leading to very long queues on the A3094 Harnham and netherhampton road during Wiltshire schools term time and on market day (Tuesdays). This road also serves thousands HGVS, vans, day-trippers and holiday-makers heading for the West Country and the South Coast. The abandoned proposals for a Harnham Relief Road / Brunel Link Road are in my opinion s tragedy and were unsupported and unfunded by the former Wiltshire County Council. Since then the traffic build up on the A3094 and 338 Downton and Newbridge roads has got progressively worse. Therevis currently no public transport to the Netherhampton Road sites and the proposed new locations for housing in West Harnham (740 - Netherham Road) are too far to walk into the city and there is no cycle route either. If the proposals are approved, traffic movements will increase exponentially. Improvement of the cycle paths and local road network in east and west Harnham first before these new houses are built, remodelling of the A3094/A338 Harnham gyrotory junction to make it safer for pedestrians, cyclists and passing vehicle drivers, and building the Harnham relief road. Building a secondary school in Harnham and including space in your plans for the combined doctors surgery (St Ann street. Endless Street and Three Swans surgeries) to avoid them building their super surgery on the designated wildlife field off Odstock Road and Lime Kiln Way, which was gifted to the local community , and is heavily used by families, dog walkers and runners for recreational use Whilst I support holding new homes for local people, the piecemeal nature of developments ,often won on appeal that occurs in in south Wiltshire results in developers getting out of funding or building the necessary infrastructure (e.g. pavements, cycle routes and improvement of the local road network in and around Salisbury , which is ruining Salisbury as a place to live and work. More joined up consultation with the local schools, hospital and Gp surgeries, netherhampton parish and Salisbury city council would go a long way to make sure we get the right housing developments in the right locations and with the necessary infrastructure for a vibrant community where families want to come and live.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Do the inspector hears first hand from local residents, not officers and councillors working or living elsewhere in Wiltshire (Trowbridge)who have inaccurate information or have no first hand knowledge about the extreme traffic congestion that blights our community in Harnham				

Comment ID:	217	Consultee Mr David Arundale Person ID: 1123267	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		salisbury and harnham		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Fundamental Misunderstanding</p> <p>The planning process has completely lost sight of the fact that the City of Salisbury exists at the confluence of five rivers. There is only one proper river crossing suitable for heavy vehicles. It also is the home of a Cathedral of national importance.</p> <p>As a consequence the road and rail networks are restricted by necessity of passing through Salisbury's narrow and complicated streets, the layout of which has evolved around the rivers and the Cathedral Close.</p> <p>The East-West road system around Salisbury is poor by national standards and made worse by the unavoidable blockage that is Salisbury. North-South is inadequate by any standards – plus the Salisbury blockage. The railway network is alright if you are going to London, Exeter, Southampton or Bristol. Elsewhere involves time and changes.</p> <p>Salisbury does not have capacity for more residents</p> <p>The number of houses and the population of Salisbury (including Wilton) has doubled in a very short time. The existing congestion problem is obvious, particularly when there are road works or accidents. Emergency vehicles, ambulances or police cars, cannot break through the narrow streets and junctions. Already many more residences are approved, mostly brown field sites. There just is no room for thousands more people with their needs for transport, services, schools, parking and other features of lifestyle.</p> <p>Netherhampton Road cannot take more traffic</p> <p>Development of hundreds of houses plus businesses along the A3094 Netherhampton Road is particularly senseless. The road is already subject to frequent traffic delays and is so difficult (at Wilton House wall) that neither buses nor large vehicles use it from end to end.</p> <p>The A3094 is like a tube with one outlet at each end:</p> <ol style="list-style-type: none"> 1. At one end is the so called "Harnham Gyrotory" which is notoriously congested. It is the main way into Salisbury but also is the only way out to the crucially important District Hospital. In addition it has to handle longer distance traffic towards the Bournemouth conurbation. 2. At the other end it links into the A36 where it feeds into Salisbury (and Churchfields) before it can continue to Southampton, London and other major places. <p>The Inspector must obtain a proper perspective</p> <p>It would be particularly undemocratic if the Planners field an Inspector who lives a long way away from Salisbury. A proper appreciation of Salisbury cannot be made by a short conducted tour at off peak times or during school holidays.</p> <p>Lets think a bit more deeply</p> <p>Accepting, as one must, that there is a national requirement for more houses somewhere full consideration ought to be given to rural settlements. In many cases the genuine residents will welcome expansion if it brings more amenities and services. A project of this scale is a new town rather than a simple housing development. The space is there. Influential landowners will have to be persuaded.</p> <p>Netherhampton Road cannot take more traffic</p>				

	<p>Development of hundreds of houses plus businesses along the A3094 Netherhampton Road is particularly senseless. The road is already subject to frequent traffic delays and is so difficult (at Wilton House wall) that neither buses nor large vehicles use it from end to end. The A3094 is like a tube with one outlet at each end:</p> <ol style="list-style-type: none"> 1. At one end is the so called "Harnham Gytratory" which is notoriously congested. It is the main way into Salisbury but also is the only way out to the crucially important District Hospital. In addition it has to handle longer distance traffic towards the Bournemouth conurbation. 2. At the other end it links into the A36 where it feeds into Salisbury (and Churchfields) before it can continue to Southampton, London and other major places. <p>The Inspector must obtain a proper perspective It would be particularly undemocratic if the Planners field an Inspector who lives a long way away from Salisbury. A proper appreciation of Salisbury cannot be made by a short conducted tour at off peak times or during school holidays. Lets think a bit more deeply Accepting, as one must, that there is a national requirement for more houses somewhere full consideration ought to be given to rural settlements. In many cases the genuine residents will welcome expansion if it brings more amenities and services. A project of this scale is a new town rather than a simple housing development. The space is there. Influential landowners will have to be persuaded. The Inspector must obtain a proper perspective It would be particularly undemocratic if the Planners field an Inspector who lives a long way away from Salisbury. A proper appreciation of Salisbury cannot be made by a short conducted tour at off peak times or during school holidays. Lets think a bit more deeply Accepting, as one must, that there is a national requirement for more houses somewhere full consideration ought to be given to rural settlements. In many cases the genuine residents will welcome expansion if it brings more amenities and services. A project of this scale is a new town rather than a simple housing development. The space is there. Influential landowners will have to be persuaded. Think. Be proactive. Do not accept the government/party line.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>I doubt if you will review my comments seriously unless I am there.</p>

Comment ID:	218	Consultee Mr David Arundale Person ID: 1123267	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		salisbury and harnham		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>COMMENTS AND OBJECTION ON WILTSHIRE PLANNING DOCUMENT</p> <p>The Fundamental Misunderstanding</p> <p>The planning process has completely lost sight of the fact that the City of Salisbury exists at the confluence of five rivers. There is only one proper river crossing suitable for heavy vehicles. It also is the home of a Cathedral of national importance.</p> <p>As a consequence the road and rail networks are restricted by necessity of passing through Salisbury's narrow and complicated streets, the layout of which has evolved around the rivers and the Cathedral Close.</p> <p>The East-West road system around Salisbury is poor by national standards and made worse by the unavoidable blockage that is Salisbury. North-South is inadequate by any standards – plus the Salisbury blockage. The railway network is alright if you are going to London, Exeter, Southampton or Bristol. Elsewhere involves time and changes.</p> <p>Salisbury does not have capacity for more residents</p> <p>The number of houses and the population of Salisbury (including Wilton) has doubled in a very short time. The existing congestion problem is obvious, particularly when there are road works or accidents. Emergency vehicles, ambulances or police cars, cannot break through the narrow streets and junctions. Already many more residences are approved, mostly brown field sites. There just is no room for thousands more people with their needs for transport, services, schools, parking and other features of lifestyle.</p> <p>Netherhampton Road cannot take more traffic</p> <p>Development of hundreds of houses plus businesses along the A3094 Netherhampton Road is particularly senseless. The road is already subject to frequent traffic delays and is so difficult (at Wilton House wall) that neither buses nor large vehicles use it from end to end.</p> <p>The A3094 is like a tube with one outlet at each end:</p> <ol style="list-style-type: none"> 1. At one end is the so called "Harnham Gyrotory" which is notoriously congested. It is the main way into Salisbury but also is the only way out to the crucially important District Hospital. In addition it has to handle longer distance traffic towards the Bournemouth conurbation. 2. At the other end it links into the A36 where it feeds into Salisbury (and Churchfields) before it can continue to Southampton, London and other major places. <p>The Inspector must obtain a proper perspective</p> <p>It would be particularly undemocratic if the Planners field an Inspector who lives a long way away from Salisbury. A proper appreciation of Salisbury cannot be made by a short conducted tour at off peak times or during school holidays.</p> <p>Lets think a bit more deeply</p> <p>Accepting, as one must, that there is a national requirement for more houses somewhere full consideration ought to be given to rural settlements. In many cases the genuine residents will welcome expansion if it brings more amenities and services. A project of this scale is a new town rather than a simple housing development. The space is there. Influential landowners will have to be persuaded.</p> <p>Submitted by DAVID G. ARUNDALE.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Who can I trust to represent the position of people like me who actually live in Salisbury. Certainly not Wiltshire Council.

Comment ID:	219	Consultee Mrs Janvrin Hawker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123379		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan to build 640 houses on the Netherhampton Road and 100 houses on the north of the road are unsound as the infrastructure for such a build is not there in context of schools, shops and health requirements. The main concern is the effect on the increased amount of traffic leading onto the Netherhampton Road, Harnham Road and Harnham Gyrotory is unsustainable, already there are large tailbacks in the area and the risk of hampering access to the hospitals for emergency vehicles is greatly increased. The area designated north of the Netherhampton is frequently flooded and both of the developments have substantial environmental issues in respect of drainage. Lastly I do not believe that one session of consultation in the holiday month of July counts as a full consultation.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	220	Consultee dr harriet meader Person ID: 1123399	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1 and H3.3				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am not a lawyer and so cannot give details but would be surprised whether something so ill thought out could be legal. I have copied the response put together by the parish council. I was involved in the discussion, agree with it all and feel I could not better it.</p> <p>NOT FAIR OR PROPORTIONATE</p> <p>There is no “nimbyism” behind our objection. The constructive manner in which all residents of Netherhampton have engaged in the discussion with the Wilton Estate regarding the planning application for development at Netherhampton Farm demonstrates that there is acceptance of the need for new housing provided that its scale is in keeping with the existing settlement and can be sustained by the local infrastructure. Netherhampton has approximately 60 dwellings and this new development at Netherhampton Farm will increase that number by over 30%. This feels like a fair share of the overall commitment facing South Wilshire and Wiltshire generally.</p> <p>The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury.</p> <p>The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary?</p> <p>The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	221	Consultee Mrs Catherine Griffin Person ID: 1123400	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury H3.1, H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In the Atkins report – Salisbury Transport Strategy 2009, it was stated that the traffic capacity during morning and evening peak times exceeds 70% at both the Harnham Gyratory and Park Wall junction and that by 2026 Highway congestion is forecast to increase by approximately 50% and delays are forecast to more than double in the morning and evening peaks. Currently at peak times there are long tailbacks on the Netherhampton Road to the Park Wall junction and from the Netherhampton Road from the junction with the Harnham Road and beyond to the Harnham Gyratory. 740 new houses on the Netherhampton Road will only add to this gridlock – potentially this could be an additional 1,480 cars.</p> <p>There are no transport links to this area and the proposed developments are too far away from the town centre to walk into town so everyone living in the new development will be driving cars to go to work, get to shops and supermarkets and local amenities.</p> <p>There would not be enough work in Salisbury so over 700 additional people could be driving to work at peak times.</p> <p>Added to this, if a new primary school is built there will be parents driving children to school from other parts of Salisbury which will add to the congestion.</p> <p>This development would be of no benefit to the local community in Harnham – it would only cause more traffic misery and air pollution.</p> <p>I was told at the public exhibition held at the Guildhall, Salisbury on 19th July that traffic improvements would be made, but there was no plan available to show what these improvements might be. It is difficult to see what improvements could be made that would mitigate the traffic gridlock. Unless there is a sensible plan to reduce the traffic, or at least not add to the congestion, any housing development along the Netherhampton Road is not sound.</p> <p>Any housing development along the Netherhampton Road should only be considered in conjunction with a sustainable and workable traffic plan. The development should not be considered and definitely not approved until a realistic plan has been formulated to mitigate the additional traffic problems that would be caused by a large housing development on a road that already has significant traffic congestion.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	222	Consultee Ms Rachel Hunt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1102653		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 1021 Church lane		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		Other Infrastructure In addition to traffic concerns, there appears to have been little thought given to providing adequate infrastructure on the Southwick side of town. In fact, the two doctors surgeries which serve the south west side of Trowbridge (Wingfield and Bradford Road) have recently merged with Adcroft to provide a large health centre on completely the opposite side of town. All of the above further add to my opinion that the core strategy and housing site allocations plan cannot be fully justified.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	223	Consultee Mr IAN MELLOR	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123590		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Topic 1 Settlement Boundary Review Methodology			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Settlement Boundary Review and the methodology used and the criteria applied are rigorous, sound, justified , effective and comprehensive. In particular the settlement boundary for Marlborough is sound and justified.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	224	Consultee Mr IAN MELLOR	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123590		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Community Topic Paper Marlborough			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Para 5.4 This paragraph confirms that there is a residual requirement for only 17 additional homes in addition to all those under construction or with planning permission, and concluded that there is no need to allocate additional land. This is correct, sound, justified and positively prepared. There are several brownfield sites in the town including St Peter's School site Police Station Adult Resource Centre gas Works site which will come forward with proposals for new homes which will exceed the appropriate number of new houses in Marlborough in the plan period. No new greenfield sites should be required .				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	225	Consultee Mr IAN MELLOR Person ID: 1123590	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Community Topic Paper Marlborough			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Community Topic Paper Marlborough Paragraph 2.5 refers to the Infrastructure Delivery Plan. Bullet point 1 suggests 'a new site for Preshute Primary School' This requirement is out of date and misleading.</p> <p>A new school has just been built to replace St Peter's and St Mary's. The new school, called St Mary's has capacity for 420 pupils plus 20 special need places. This is 120 more places than the combined roll of St Peter's and the previous St Mary's. There is no need for any additional places in Marlborough, and the additional places will accomodate many pupils who currently attend Preshute.</p> <p>If all the pupils who attend Preshute cannot attend the new school then Preshute can be reduced in size and a new school built on the current Preshute site.</p> <p>The Infrastructure Delivery Plan is out of date. It says that existing school sites cannot expand to meet needs of new housing. This fails to take account of the new school which clearly has capacity for new pupils. The reference to a new site for Preshute is iut of date and unjustified.</p> <p>The Infrastructure Delivery Plan confirms that there is no Government funding for a new school for Preshute and indeed no funding has been identified from anywhere. The proposal is therefore not sound.</p> <p>The IDP suggests that fundng can come from developer contributions.This too is out of date as it ignores the fact that Wiltshire Council has adopted CIL and no new school is included in the Regulation 123 schemes for developer funding. The IDP is out of date and unsound and the Area Topic Paper that refers to it is also unsound.</p> <p>The School Places Strategy confirms a falling birth rate in Marlborough and shows that there are surplus places in Primary Schools up to 2025 even after taking account of the planned new homes. Even this is flawed as the School places strategy wrongly assumes that the housing requirement for Marlborough is 920, whereas in fact it is 680. The 920 is the requirement for the whole community area which includes several other schools in the other 18 parishes in the community area.</p> <p>The Capital Assets Committee meeting in January 2017 approved the Schools Capital Investment Programme. Not surprisingly there is no provision for another new school in Marlborough to replace Preshute.</p> <p>For all these reasons the reference in the Marlborough Area Topic Paper to a new school site for Preshute is misleading, unnecessary, unfunded , out of date and unsound and should be deleted as a new school will not be delivered in the plan period and may never be required.</p> <p>Finally in the next Core Strategy post 2026 it is clear from the Strategic Housing Land Availability Assessment that the next phase of growth will be along the Kennet Valley to the East as an extension to the housing at the old St John's school site on Elcot Lane and Chopping Knife Lane. Ultimately if the town continues to expand at the current unprecedented rate a new primary school will be necessary and this should be in the east where the new houses are sugested in the SHLAA</p>			
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

My comments refer to a number of Council documents which the Inspector may not have to hand and may not be aware of as they are not part of the Site Allocation documents. These additional documents referred above, however demonstrate that the reference s in the Marlborough Area Topic Paper to a new school is flawed unsound and unjustified. It will also be clear by the time of the Inquiry how many pupils from Marlborough actually attend Preshute.and how many travel long distances from elsewhere.

Comment ID:	226	Consultee Mrs K Clay Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Aldbourne Parish Council Person ID: 1122943		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.8			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The changes proposed to the Aldbourne Settlement Boundary are noted by Aldbourne Parish Council, and that whilst they have no immediate comment, they wish to reserve the right to request revisions in the future in light of the upcoming Neighbourhood Plan for the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	227	Consultee Mr Paul Simmonds	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123646		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury. • The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary? • The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many consideration i have outlined. The impact of these plans on residents will be very significant and i believe that it is vital that the council is held accountable and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan				

Comment ID:	228	Consultee Mrs Alison Simmonds	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123667	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <ul style="list-style-type: none"> • The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”. • Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.” 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The consultation has been drawn up without proper regard to the many considerations i have outlined. The impact on residents and the environment will be significant and i believe it is vital that the council is held to account and made to give careful thought to these impacts "Before" it adopts these plans.			

Comment ID:	229	Consultee Mrs Alison Simmonds Person ID: 1123667	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE • Para 5.128 of the Draft Allocation Plan says: “The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS”. This is simply not true. • The “Salisbury Transport Strategy” (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed. • Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: • “Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy.” • It should also be noted that such “Salisbury Transport Strategy” as exists is not detailed and has never been subject to public consultation or formal adoption. • Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end. • We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague “solutions” should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through. • There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess. • We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all. • Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard to the many considerations i have outlined. The impact on residents and the environment will be significant and i believe it is vital that the council is held to account and made to give careful thought to these impacts "Before" it adopts these plans.				

Comment ID:	230	Consultee Mrs Alison Simmonds	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123667		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLOOD & SEWAGE IMPACT</p> <ul style="list-style-type: none"> • Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites. • Site S1027 is well known locally for having standing water regularly during the winter. • There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard to the many considerations i have outlined. The impact on residents and the environment will be significant and i believe it is vital that the council is held to account and made to give careful thought to these impacts "Before" it adopts these plans.</p>				

Comment ID:	231	Consultee Mrs Alison Simmonds	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123667		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		NOISE • A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The consultation has been drawn up without proper regard to the many considerations i have outlined. The impact on residents and the environment will be significant and i believe it is vital that the council is held to account and made to give careful thought to these impacts "Before" it adopts these plans.			

Comment ID:	232	Consultee Mrs Alison Simmonds Person ID: 1123667	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site Nos H3.1 and H3.3		Justified Effective Consistent with national policy		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	FLAWED PROCESS <ul style="list-style-type: none"> • We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process. • The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed. • The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan. • The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard to the many considerations i have outlined. The impact on residents and the environment will be significant and i believe it is vital that the council is held to account and made to give careful thought to these impacts "Before" it adopts these plans.				

Comment ID:	233	Consultee Mrs Alison Simmonds	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123667		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>VISUAL AMENITY / HERITAGE LANDSCAPE</p> <ul style="list-style-type: none"> The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The consultation has been drawn up without proper regard to the many considerations i have outlined. The impact on residents and the environment will be significant and i believe it is vital that the council is held to account and made to give careful thought to these impacts "Before" it adopts these plans.			

Comment ID:	234	Consultee Mrs Alison Simmonds	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123667		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GENERALLY ILLOGICAL</p> <ul style="list-style-type: none"> • No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school. • The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard to the many considerations i have outlined. The impact on residents and the environment will be significant and i believe it is vital that the council is held to account and made to give careful thought to these impacts "Before" it adopts these plans.				

Comment ID:	235	Consultee Mr Paul Simmonds	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123646		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <ul style="list-style-type: none"> • The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”. • Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.” 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many consideration i have outlined. The impact of these plans on residents will be very significant and i believe that it is vital that the council is held accountable and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan				

Comment ID:	236	Consultee Mr Paul Simmonds Person ID: 1123646	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE</p> <ul style="list-style-type: none"> • Para 5.128 of the Draft Allocation Plan says: “The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS”. This is simply not true. • The “Salisbury Transport Strategy” (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed. • Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: • “Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy.” • It should also be noted that such “Salisbury Transport Strategy” as exists is not detailed and has never been subject to public consultation or formal adoption. • Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end. • We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague “solutions” should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through. • There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess. • We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all. • Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many consideration i have outlined. The impact of these plans on residents will be very significant and i believe that it is vital that the council is held accountable and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan				

Comment ID:	237	Consultee Mr Paul Simmonds	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123646		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLOOD & SEWAGE IMPACT</p> <ul style="list-style-type: none"> • Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites. • Site S1027 is well known locally for having standing water regularly during the winter. • There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many consideration i have outlined. The impact of these plans on residents will be very significant and i believe that it is vital that the council is held accountable and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan				

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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		NOISE • A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.			
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>FLAWED PROCESS</p> <ul style="list-style-type: none"> • We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process. • The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed. • The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan. • The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain. 			
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>VISUAL AMENITY / HERITAGE LANDSCAPE</p> <ul style="list-style-type: none"> The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many consideration i have outlined. The impact of these plans on residents will be very significant and i believe that it is vital that the council is held accountable and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan				

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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GENERALLY ILLOGICAL</p> <ul style="list-style-type: none"> • No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school. • The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all. 				
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Comment ID:	242	Consultee dr harriet meader	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123399		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I am not a lawyer and so cannot give details but would be surprised whether something so ill thought out could be legal. CONTRARY TO HOUSING DELIVERY STRATEGY The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”. Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.			

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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am not a lawyer and so cannot give details but would be surprised whether something so ill thought out could be legal.</p> <p>INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE</p> <p>Para 5.128 of the Draft Allocation Plan says: “The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS”. This is simply not true.</p> <p>The “Salisbury Transport Strategy” (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed.</p> <p>Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: “Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy.”</p> <p>It should also be noted that such “Salisbury Transport Strategy” as exists is not detailed and has never been subject to public consultation or formal adoption.</p> <p>Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end.</p> <p>We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague “solutions” should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through.</p> <p>There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess.</p> <p>We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all.</p> <p>Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.</p>				
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am not a lawyer and so cannot give details but would be surprised whether something so ill thought out could be legal.</p> <p>FLOOD & SEWAGE IMPACT</p> <p>Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites.</p> <p>Site S1027 is well known locally for having standing water regularly during the winter.</p> <p>There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity.</p>				
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am not a lawyer and so cannot give details but would be surprised whether something so ill thought out could be legal. NOISE A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.				
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am not a lawyer and so cannot give details but would be surprised whether something so ill thought out could be legal.</p> <p>FLAWED PROCESS</p> <p>We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process.</p> <p>The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed.</p> <p>The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan.</p> <p>The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain.</p>				
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If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

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		Person ID: 1123399		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am not a lawyer and so cannot give details but would be surprised whether something so ill thought out could be legal. VISUAL AMENITY / HERITAGE LANDSCAPE The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset.				
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		Person ID: 1123399		Do you consider the draft WHSAP is sound?	No
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>I am not a lawyer and so cannot give details but would be surprised whether something so ill thought out could be legal.</p> <p>GENERALLY ILLOGICAL</p> <p>No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school.</p> <p>The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all.</p>				
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If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	249	Consultee Mr William Roper Person ID: 1122632	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
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				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Similarly, the only road supporting this development is not capable of handling the additional 1000 or so vehicles that it would bring. It is already acknowledged that Netherhampton Road, Newbridge Road and the Harnham Gyratory are close to capacity. Indeed, as one of the organisers of the demonstration when about a dozen or so of us drove backwards and forwards between the Harnham Business park and round the Gyratory causing delays at the Gyratory of over an hour. So I am well aware of how small an increase of traffic is needed to bring the Gyratory to an almost complete stand still. It must also be borne in mind that this is the chokepoint through which most of the traffic to the District Hospital must pass. Because of the difficulties at the Wilton end, most of this new traffic must pass through the gyratory.</p> <p>Paragraph 5.136 has some woolly words about local and strategic roads, but they amount to very little, apparently putting the onus on the developer to do the work. This is simply not good enough. If this development must go ahead, then it must only be allowed after the road improvements have been made. A cycle track and a couple of extra busses are not going to solve the problem.</p> <p>If the plan for the development on Netherhampton Road is to go ahead it must be firmly linked to the necessary road improvement. There must be the clear undertaking that no development will be allowed until after the road improvements have been undertaken.</p> <p>The whole of this consultation process has been opaque. It has been difficult to wade through the large amount of documentation to find the relevant bits. Is it cynical of me to suggest that the public consultation in Salisbury was held in the middle of the summer holidays in a deliberate attempt to reduce attendance?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	250	Consultee Mr William Roper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122632		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	A few final points. Why does the author of this plan consider that the new inhabitants will only have primary school children? All the secondary schools in Salisbury are north of the river Avon, putting further pressure on the Gyratory and Newbridge road. Only 1 of these, Bishop Wordsworths, is within 3 miles of the development, and then only just, so lots of free school transport is needed. The whole of this consultation process has been opaque. It has been difficult to wade through the large amount of documentation to find the relevant bits. Is it cynical of me to suggest that the public consultation in Salisbury was held in the middle of the summer holidays in a deliberate attempt to reduce attendance?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	251	Consultee Mr William Roper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122632		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Effective				
Attached files (Please see Objective)	There is a need for a GP Surgery and pharmacy south of the river today. If tis proposal is to go ahead, this need must be addressed. The development will also need a shop and a community hall.				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The development must make provision for genuinely low cost housing within the reach of the average wage-earner in the Salisbury area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	253	Consultee Mrs Lynne Greenhalgh	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123223		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a very recent former school governor at Harnham Junior School, I know that both the current Harnham primary schools are at maximum capacity, and whilst building a second 2 form primary school will help relieve capacity for the new Rowbarrow homes, why is no thought being given to including a new secondary school in your plans for the Harnham area as with the exception of Wyvern boys school which is under subscribed, St Edmunds Girls school (Laverstock), Trafalgar School (Downton) and Burgate school (Fordingbridge), where the majority of Harnham children not going to grammar school go to, are over subscribed, are too far to walk to or cycle safely to. The contracted Wiltshire school bus service (route 650) to get to the designated Laverstock schools for children living in Harnham, especially in east Harnham is poor, expensive, unreliable, there are not enough seats on the school bus so children have to sit on other children's laps, and the bus dorstnt serve any of the east Harnham estates including Rowbartow in the mornings. As a result many parents drive them to school in the mornings adding to the congestion on the A3004 Netherhampton and A348 Downton and Newbridge Roads.</p> <p>Improvement of the cycle paths and local road network in east and west Harnham first before these new houses are built, remodelling of the A3094/A338 Harnham gyratory junction to make it safer for pedestrians, cyclists and passing vehicle drivers, and building the Harnham relief road. Building a secondary school in Harnham and including space in your plans for the combined doctors surgery (St Ann street. Endless Street and Three Swans surgeries) to avoid them building their super surgery on the designated wildlife field off Odstock Road and Lime Kiln Way, which was gifted to the local community , and is heavily used by families, dog walkers and runners for recreational use</p> <p>Whilst I support holding new homes for local people, the piecemeal nature of developments ,often won on appeal that occurs in in south Wiltshire results in developers getting out of funding or building the necessary infrastructure (e.g. pavements, cycle routes and improvement of the local road network in and around Salisbury , which is ruining Salisbury as a place to live and work. More joined up consultation with the local schools, hospital and Gp surgeries, netherhampton parish and Salisbury city council would go a long way to make sure we get the right housing developments in the right locations and with the necessary infrastructure for a vibrant community where families want to come and live.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Do the inspector hears first hand from local residents, not officers and councillors working or living elsewhere in Wiltshire (Trowbridge)who have inaccurate information or have no first hand knowledge about the extreme traffic congestion that blights our community in Harnham				

Comment ID:	254	Consultee Mr Frank Winfield	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122960		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The document as a whole			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I believe that: the Plan is not effective because Wiltshire County Council 's examination of 'windfall', which is expected to provide 60% of new housing, is grossly inadequate – comprising one page out of 4,500 pages of the Plan documents Wiltshire County Council should re-assess the requirement for new housing stock, particularly where this would impinge on greenfield sites and overload existing infrastructure. In addition, all suitable brownfield sites should be fully utilised before any new development is permitted on greenfield sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	255	Consultee Mr Frank Winfield	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122960		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The document as a whole			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I believe that: the Plan is not justified because Wiltshire County Council have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion Wiltshire County Council should re-assess the requirement for new housing stock, particularly where this would impinge on greenfield sites and overload existing infrastructure. In addition, all suitable brownfield sites should be fully utilised before any new development is permitted on greenfield sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	256	Consultee Mr Frank Winfield	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1122960	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The document as a whole			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I believe that: the Plan is not positively prepared because it does not meet objectively assessed development requirements. Wiltshire County Council propose to increase the size of Trowbridge by one quarter during the Plan period (and more after that) and this exceeds the requirement for a five year supply Wiltshire County Council should re-assess the requirement for new housing stock, particularly where this would impinge on greenfield sites and overload existing infrastructure. In addition, all suitable brownfield sites should be fully utilised before any new development is permitted on greenfield sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	257	Consultee Mr Christopher Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122587	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111),SA objective 2,SA objective 7,SA objective 10,SA objective 11,			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111)</p> <p>In response to the Wiltshire Housing Site Allocations Plan I would like to raise the following objections to the development proposals: SA objective 7. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place.</p> <p>A development on this site would blight the character of Harnham which provides a significant rural backdrop vista to the cathedral and an important countryside image for the South West approaches to the City. There is no requirement to build housing in an area that does not have sufficient employment opportunities. A development of the size proposed is likely to require significant enhancements to the local infrastructure. In particular, roads which are already at maximum capacity; bridges over the River Eble and the Water meadows. Given that the bypass ring road and 'Brunell Link' around Salisbury were cancelled some time ago, are they likely to be reinstated under the guise of infrastructure enhancements in future? In which case, the issue of in-fill between new road systems and existing housing boundaries would become a further major issue.</p> <p>The need for additional housing is well recognised however, the key requirement is to meet local needs by building affordable housing in the right place. A large development on the south of the Netherhampton Road on the outskirts of Harnham does not meet these requirements and is not supported by the local residents. Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. For a large scale housing requirements, consideration should be given to enhancing current development sites, possibly under the guise of a new 'Garden City' status, where supporting infrastructure can be created without adversely impacting on local residents. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	258	Consultee Mr Christopher Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122587	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111),SA objective 2,SA objective 7,SA objective 10,SA objective 11,			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111)</p> <p>In response to the Wiltshire Housing Site Allocations Plan I would like to raise the following objections to the development proposals:</p> <p>SA objective 10. Reduce the need to travel and promote more sustainable transport choices</p> <p>The Harnham Road is already at maximum capacity and without the prospect of widening this development will make it intolerable for locals. At present in rush hour and at peak times of traffic through put, the Harnham Gyratory rapidly becomes gridlocked with vehicle backed-up along the Netherhampton and Coombe Bissitt Roads. One of the effects of this congestion is for traffic to use short-cuts in an attempt to avoid the bottlenecks. In particular, traffic coming from or going towards Coombe Bissitt is using the Old Blandford Road across Harnham Hill and traffic travelling from the Netherhampton direction and heading towards Salisbury and the Churchill Way ring road will use the Old Netherhampton Road through Harnham Village. Both of these roads are minor and designed for local resident use and not heavy industrial traffic. Furthermore, the Old Blandford Road is used as a drop-off and pick-up point for Harnham Primary School. The prospect of an additional 1,000 vehicles accessing the Netherhampton Road will have significant adverse impact on local congestion, air quality, noise, the use of short-cuts (rat runs) and access to the City for many residents. Salisbury's transport problems already require solutions to the Southampton Road and Churchill Way links including the not insignificant issue of bridges and crossing water meadows. To add to these difficulties by building a large housing estate in Harnham is creating more pressure on an already overloaded road system which is both unnecessary and unwanted.</p> <p>The need for additional housing is well recognised however, the key requirement is to meet local needs by building affordable housing in the right place. A large development on the south of the Netherhampton Road on the outskirts of Harnham does not meet these requirements and is not supported by the local residents. Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. For a large scale housing requirements, consideration should be given to enhancing current development sites, possibly under the guise of a new 'Garden City' status, where supporting infrastructure can be created without adversely impacting on local residents. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	259	Consultee Mr Christopher Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122587	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111), SA objective 2, SA objective 7, SA objective 10, SA objective 11,			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111)</p> <p>In response to the Wiltshire Housing Site Allocations Plan I would like to raise the following objections to the development proposals: SA objective 11. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth. The need for local housing would be better met by fewer houses built on brown field sites closer to work places which are generally north of the City (e.g. business parks in Churchfields, Sarum and Porton Down). A development of the size proposed in this location would have the effect of providing dormitory facilities for centres of employment further afield (e.g. London and Southampton). The proposal to build a significant housing site on the south of the city boundary runs contrary to the north of Salisbury development plan that is already on-going between Old Sarum and Boscombe Down.</p> <p>The need for additional housing is well recognised however, the key requirement is to meet local needs by building affordable housing in the right place. A large development on the south of the Netherhampton Road on the outskirts of Harnham does not meet these requirements and is not supported by the local residents. Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. For a large scale housing requirements, consideration should be given to enhancing current development sites, possibly under the guise of a new 'Garden City' status, where supporting infrastructure can be created without adversely impacting on local residents. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	260	Consultee Mr Matthew Brignall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1120170		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road,Harnham,Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>It has not taken in to account the catastrophic impact of Harnham and the surrounding area,at the present time Netherhampton road is at full capacity with the volume off traffic that comes through it,there are regular jams and tail back which are not sustainable for the local area.This also causes pollution and lowers the quality of life,the building of 840 Houses in Harnham and the increased population as a result of the large scale housing development will also put a strain on local services le:Hospitals,Drainage and general over population for an area where people have moved to,to get away from large urban conubations,Housing is needed but this is the wrong area,also most of the proposed housing will be unafordable for most local people.</p> <p>It will need to have a thorough survey of the impact to the environment le: Carbon Monoxide levels from the extra 1300 cars that will using the roads,an impact to Wildlife and to the general quality of life being reduced.Evidence has found heavy traffic effects brain development in small children.It needs a major survey of the infrastructure as well.</p> <p>It has not taken in to account the catastrophic impact of Harnham and the surrounding area,at the present time Netherhampton road is at full capacity with the volume off traffic that comes through it,there are regular jams and tail back which are not sustainable for the local area.This also causes pollution and lowers the quality of life,the building of 840 Houses in Harnham and the increased population as a result of the large scale housing development will also put a strain on local services le:Hospitals,Drainage and general over population for an area where people have moved to,to get away from large urban conubations,Housing is needed but this is the wrong area,also most of the proposed housing will be unafordable for most local people.</p> <p>It will need to have a thorough survey of the impact to the environment le: Carbon Monoxide levels from the extra 1300 cars that will using the roads,an impact to Wildlife and to the general quality of life being reduced.Evidence has found heavy traffic effects brain development in small children.It needs a major survey of the infrastructure as well</p> <p>The whole scheme needs to be stopped,it will destroy Harnham and cause nothing but Pollution and destroy the whole fabric of Harnham,I see nothing positive from this proposal.It will put a strain on roads,drainage,local services and cause more carbon monoxide pollution to the area.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I feel I have the support of most Harnham residents,I was born and bread in Harnham and am passionate about its future.			

Comment ID:	261	Consultee Miss Frances Howard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105345	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Harnham Netherhampton Site			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The number of houses is too great and the road 3094 will not take the 1000 extra cars. the site is unsustainable. The majority of houses will not meet the needs of people on average income £24k. The economic benefit to the area is not proved.</p> <p>There needs to be a tunnel for pedestrians to cross from the Britford Road to the Harnham Road to access the school. There needs to be fixed rent accommodation to enable local people to have somewhere to live. There needs to be walkways and cycle paths into Salisbury from the proposed housing development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	262	Consultee Mr Edward Bull	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1122629		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>no public consultation, on change of scale of change on this site previously a reserve site with a smaller number of houses. proper public consultation on issues conducted by planners who know this area . Consideration of traffic and flooding implications not researched. Feasible infrastructure changes need to be proposed and discussed before this plan could be considered .Currently the Harnham /Netherhampton Road is not capable of taking more traffic at peak times, and a development on this scale will add at least another 1000 vehicles. The main road fronting this proposed development was already identified in the 2012 transport strategy as being at capacity. I cannot envisage anything you could do with a road already developed at the "city end" with house on both sides to make this situation different. The high water table in this area is already acknowledged as making significant improvements to the sewerage system very difficult and the surface water "run off " from this site would be directly onto a flood plain (H3.3), which you are also proposing to build on!.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is very difficult to articulate in any meaningful way via a form.				

Comment ID:	263	Consultee Mr Edward Bull	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1122629	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No public consultation, of any real in depth quality.</p> <p>Some flood control measures would need to be investigated and approved before this proposal should even be considered. The H3.3 site is on the Environmental Agency's map as a high risk flood site.</p> <p>Basic requirements of traffic management and flood risk have not been addressed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	These issues cannot be discussed via a form.				

Comment ID:	264	Consultee Mr James Riddell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124064		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The sites H3.1 and H3.3 are referred to as 'in Salisbury' and as part of 'the Salisbury Community area'. Neither statements are correct as the sites are in the parish of Netherhampton which is a village. It would appear insufficient care was taken to check this basic fact and as a result the proposal for these sites should be considered as unsound.</p> <p>Because Netherhampton is a village of about 60 dwellings the addition of potentially 740 dwellings would swamp this small community. The village has already accepted a plan for some 22 dwellings on the site of Netherhampton Farm which can be absorbed into the community and is not considered as overdevelopment which H3.1 and H3.3 are undoubtedly are. It is believed additional housing in small villages should be of an infill nature.</p> <p>The above comments refer to the specific sites in Netherhampton Parish and not to the full plan for Wiltshire. Therefore addressing the above concerns would help in respect of Netherhampton.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	265	Consultee Mr Ian Goddard Person ID: 1124133	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Development of the land on Netherhampton Road on this scale is not sustainable. Bearing in mind that the site is not considered to be in walking or cycling distance of the City Centre (as acknowledged in the Sustainability appraisal report), the development will cause a significant increase in traffic along the Netherhampton Road and the Harnham Road towards the Harnham Junction and the Park Wall Junction which are already congested and operating at capacity. The road is not capable of widening and there is very little scope for improvement of traffic flow and at these junctions to alleviate the problem that exists already. I don't believe a refresh of the Salisbury Transport Strategy will be able to address this.</p> <p>Whilst the plan includes a primary school, this is likely to increase the volume of traffic further if it is to take pupils from other parts of Salisbury. The plan does not include provision of a secondary school, so this will require travel across Salisbury to Laverstock or Downton. Otherwise, the plan seems to largely rely on facilities already existing in Salisbury. Use of many of the facilities in Salisbury will require travel into the City Centre which is likely to require the use of a private vehicle. A large proportion of Salisbury residents have to travel outside of Salisbury for work. For residents at the new development this would likely require travelling into the City Centre, to use train or buses, or travel through one of the junctions mentioned above to reach the A36 or the A338. It would make more sense to concentrate efforts on delivering the original project at Churchfields, which is closer to the City Centre and to public transport links.</p> <p>The development in Netherhampton Road should be removed from the plan or significantly scaled back. The original plans for Churchfields should proceed and other, more suitable sites across Wiltshire should be found to make up any shortfall if it arises.</p> <p>More generally, the plan provides for a surplus of 937 houses in South Wiltshire and 577 in Salisbury, compared with the indicative requirement. It is not justified to provide a surplus against this target if that involves development of greenfield sites. Once this agricultural land is lost, it cannot be replaced. One of the reasons given for using Salisbury as a primary focus for development is that it will provide significant levels of jobs. I would argue that this logic is flawed. Salisbury does not appear to have attracted new employers and we have seen some larger employers leave the City in recent years. The ring-road round Salisbury is the meeting point of many major A-roads and is frequently congested. An increase in housing will increase this traffic and Salisbury does not have the capacity for more traffic on these roads.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	266	Consultee Lucy M	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119762		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing this email to object to the proposed new houses on Netherhampton road. The traffic is bad enough as it is, there are not enough school places. We have always believed you should place your child at a school within walking distance but everyone now is so lazy they drive. PLanning to build on Waldrons farm which floods quite heavily in the winter does not make sense and taking away much needed farmland which should be protected, to stop urban sprawl. What are brownfield sites for.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	267	Consultee Lucy M	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119762	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing this email to object to the proposed new houses on Netherhampton road. The traffic is bad enough as it is, there are not enough school places. We have always believed you should place your child at a school within walking distance but everyone now is so lazy they drive. PLanning to build on Waldrons farm which floods quite heavily in the winter does not make sense and taking away much needed farmland which should be protected, to stop urban sprawl. What are brownfield sites for.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	268	Consultee Mr Ian Campbell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 899946		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.70 Downton settlement boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The changes proposed to Downton's settlement boundary are a somewhat muddled but major revision to Downton's settlement boundary that could be improved.</p> <p>As a member of the Neighbourhood Plan steering committee I have submitted detailed comments to the Downton Parish Council for consideration in their response.</p> <p>As a resident I consider the removal of certain recreational or amenity spaces from the settlement to be contrary to the methodology as they relate to the settlement, rather than open countryside. In particular in Moot Lane the Playing Field, Moot Garden and part of Moot House's garden should remain within the settlement boundary and in the Borough the Memorial Garden and Cricket Field should also remain.</p> <p>Downton's housing is planned to expand to the west of the A338 and whilst the revised settlement boundary adds existing properties in Mesh Pond and The Hamlet and adds the Business Centre and Leisure Centre, it excludes the Charles Church development that is under construction, possibly part of the Scott's House development and the tennis courts and Downton FC pitch so the resulting boundary is irregular and difficult to follow on the ground. The boundary needs improvement and should be made consistent with Downton's Neighbourhood Plan.</p> <p>There are inconsistencies in car parking areas that should be resolved:</p> <p>The doctor's surgery remains but the adjoining Moot Garden car park has been removed.</p> <p>The White Horse's has been extended behind the Co-op.</p> <p>Trafalgar School's has been added.</p> <p>The Leisure Centre's has been added.</p> <p>Downton Baptist Church's has been removed.</p> <p>The Catholic Church's has not been added.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	269	Consultee Tessa Welbourn	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120376	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Other Sites</p> <p>There are other sites for housing within Trowbridge what about the amount of empty buildings on the White Horse business park. I believe the Virgin building was supposed to be made into housing, the Council have messed that up too I have been told.</p> <p>The Bowyers site which is right next to the station is an excellent site where people could commute by train, and could be made into affordable housing for young people who would not want to be stuck out of the town where there are no shops, facilities and poor public transport. This would offer an enviromentally friendly solution as people would then not need to have a car so less traffic on the roads. It would improve the look of this area of Trowbridge which at present looks dreadful, we do not need another cinema there.</p> <p>Just remember this.</p> <p>If you allow this building to go ahead you will have ruined this area forever that is not something to be proud of.</p>				
Attached files (Please see Objective)	4692062				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	270	Consultee Mr Clive Burke	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 897503	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>If your plans to build 600 new homes in our green fields around Trowbridge are approved, you will destroy the identity of Hilperton, Southwick and North Bradley.</p> <p>There are sufficient building sites in the centre of our County Town at the old Bowyers site and the existing Aston Park development.</p> <p>Please do not continue to ruin our environment by the destruction of green space in the interest of Developers.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	271	Consultee Rachel Turner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site at Southwick Court is an old site and has very old hedges, which have protection rights by law. There is an abundance of wildlife including the Betchstien Bats protected by law, along with spotted woodpecker, green woodpecker, buzzard, deer, and many species of finches and starlings roost here in the winter and they are protected by law.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	272	Consultee Rachel Turner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site at Southwick Court is an old site and has very old hedges, which have protection rights by law. There is an abundance of wildlife including the Betchstien Bats protected by law, along with spotted woodpecker, green woodpecker, buzzard, deer, and many species of finches and starlings roost here in the winter and they are protected by law.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	273	Consultee Rachel Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Lastly on this site, the access will be extremely difficult, Silver Street Lane is a residential Road and doesn't allow for two cars to pass a car parked on the road. If you then intend to gain access via Balmoral Road it is even more congested. Access direct on to the Frame Road will cause chaos especially near the Southwick Country Park.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	274	Consultee Mr and Mrs J and F Hyde	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124520	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A59			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We own lot 209 and the balance of lot 210 not covered by Cassways Orchard . Together these form our garden . The draft "Proposal for Revised Settlement Boundaries " excludes part of the balance of lot 210--marked X on the attached copy. Since the Revised Settlement Boundary includes the gardens on the North,West and South of the village , we request that this area be included within the new Settlement Boundary, whether the proposed Housing Allocation to its West is adopted or not .</p>				
Attached files (Please see Objective)	4921261				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	275	Consultee Mrs Alison Edward-Smithson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124180	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>All residents of Netherhampton have engaged in the discussion with the Wilton Estate regarding the planning application for development at Netherhampton Farm and the lack of nimbyism shown there demonstrates that there is acceptance of the need for new housing provided that its scale is in keeping with the existing settlement and can be sustained by the local infrastructure. Netherhampton has approximately 60 dwellings and this new development at Netherhampton Farm will increase that number by over 30%. This feels like a fair share of the overall commitment facing South Wiltshire and Wiltshire generally. I do not object to developments per se themselves and have resigned myself to the considerable impact of the Netherhampton farm development that is very near to my home despite the many effects that it will have during construction and resulting multiplier in traffic in a village which already has severe speeding problems. We have accepted with good grace what will be the maximum we could cope with on the farm site with all the traffic resulting. However these developments on the Netherhampton Road would have a drastic and detrimental effect on the local area in the ways outlines here and by the Netherhampton Parish Council and other local representative bodies. This could become a hugely unpopular site with residents throughout the Salisbury area. People who travel here socially may finally be deterred by the increased traffic congestion in addition to the existing congestion issues and on top of the already-deterring parking prices and it would have a very negative social impact. It could become as notorious as the Southampton Road traffic issues. I don't want Salisbury, a city of history and beauty shared happily with visitors from around the world to become known more for traffic than its many wonderful attributes. Pollution from the additional traffic will be another factor. Please clarify how levels are monitored now and what impact would be expected from the longer queues.</p> <p>A smaller number of dwellings with a definite low limit which is sustainable within the village parish and the infrastructure, prevented from being expanded piecemeal over time when the sustainable first stage has been forgotten and other small developments added to other areas of South Wiltshire that can equally sustain a few houses. It would give a better environment for the residents of these houses too. It would not have the economies of scale nor the disadvantages and would enhance the country not be to its detriment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations that I and others have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE deciding whether to adopt this Housing Site Allocation Plan.				

Comment ID:	276	Consultee Mrs Victoria Wilson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124219		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Development of Ntherhampton Road		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The A3094 is a busy road that many vehicles use exceeding the 30mph speed limit. Placing more houses down this road will inevitably cause more traffic with the same outcome. I use and cross this road daily using the zebra crossing located by the on-stop shop, with this I take my life in my hands and I am lucky to cross without three/four cars speeding over the crossing.</p> <p>The extra population this will bring to already full local schools is also concerning. Too many parents already transport their children to the schools via car making it unsafe for parents who walk adding extra students will enhance this issue.</p> <p>There is simply no way of adding more houses to this community without making it more unsafe.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	277	Consultee Mrs Pauline Cridland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 466628	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object to the allocation of land at Parcels s1027 and s1028 for the following reasons:</p> <p>4. I am informed the plans for Parcel s1028 includes the provision of a new Infants and Primary School for the Harnham area. I am also told that some of the overflow from the existing Harnham School will be directed here and as the law states parents may choose a school to send their children to rather than having one allocated, this clearly would increase by some degree the amount of traffic entering the already severely congested and overloaded A3094. The school, I am informed, would not by law be just for people living in the Harnham area and my experience of new schools in other areas away from Salisbury is that parents rush to choose the new school as they envisage it having better facilities.</p> <p>5. Harnham offers no local facilities apart from the One Stop on the corner of Norfolk Road and Netherhampton Road. I understand there are no plans to add any shopping or religious facilities to any new housing site which once more will mean traffic movements for any residents to go about this normal daily activities.</p> <p>15. I asked Mr Waye about the proposed "Super Doctor Surgery" reported to have been interested in part of this site. He confirmed that no purchase of land had been made by anyone for this but this did not mean it would not go ahead. This being the case the land would appear to be being earmarked for two purposes. With doctor's surgeries in Salisbury struggling to provide access to GP's and the wait at Salisbury District Hospital running into months for many departments there would not appear to be any provision for health facilities for these proposed Salisbury developments (the overall package not just the s1028, s1027 and 3272 options in Harnham. If the land is to be used for development without any additional health facilities there will naturally be an increase in delays for medical attention to all in the region. An example would be Orthopaedic services at Salisbury where the delay is a minimum three months and the only viable other option is in Winchester at a hospital which offers very limited parking facilities and is almost impossible to reach by public transport. Any new housing will impact these services.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	278	Consultee Mrs Pauline Cridland Person ID: 466628	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I object to the allocation of land at Parcels s1027 and s1028 for the following reasons:</p> <p>7. I asked about the type of housing envisaged for these sites and was informed that they would be private builds with about 30% affordable housing. When pushed on this issue Mr Waye stated he could not sell a house on a site for say £85,000 if the going local rate was £250,000. A search on Rightmove today shows the following: “Most of the sales in Salisbury over the past year were terraced properties which on average sold for £248,822. Semi-detached properties had an average sold price of £273,567 and flats averaged at £176,790” A comparable site at Wilton currently has properties ranging from 2 bedroom semis to 5 bedroom detached in the range £249,500 to £645,000. Assuming as Mr Waye stated this would be the quality of property being sought to be built they are far from being for the local people of the Harnham area currently on the Council waiting list.</p> <p>8. In recent times, the main mass wealth employers such as Capita and Aviva (formerly Friends Life) have closed their offices in the centre of Salisbury leaving very little employment which is not in the retail or public sector arena. These were relatively highly paid jobs for local people, many of whom moved here in the Government drive in the 1980’s to relocate large financial institutions to non metropolitan rural centres to assist with spreading jobs countryside. This was a major policy of the Tory government under Baroness Thatcher and people and companies embraced it with enthusiasm. Those moved and relocated have consequently made lives in Wiltshire and raised their children here in Salisbury. However they still require work now that these businesses have closed and moved on and no effort has been made by Wiltshire or Salisbury Councils to replace these midrange jobs. Indeed most of the vacated office blocks are being earmarked for retired persons homes. This short sighted desire will mean fewer well paid jobs for the young and middle aged of the area with the knock on effect that they will not be able to afford any of these new homes and will also have to travel to find work. Surely rather than turning these sites into retirement homes they should be considered for homes if it really is impossible to persuade decent employers to offer work in the City Centre.</p> <p>9. I was told by Mr Waye that “no one builds Council houses anymore”. Whilst I agree that this is the case, it does not need to be the norm – are not housing associations allowed to build homes for affordable rent. If, as I was told by Mr Waye and Ms Smith, the central government is directing them to look at their waiting lists to make provision for future housing, should not any planning and building be for local people and at a cost (be it rented if necessary) that the local average salary will allow them to pay. It is pointless to allocate swathes of virgin green land to build houses for people to move to because Wiltshire is a nice place to live if we are not doing anything to assist those who are currently awaiting housing. These allocations go no way whatsoever to removing people from Salisbury/Wiltshire’s housing list.</p> <p>10. The average salary in Salisbury today is £23,610 according to Payscale.com. Allowing for a lender advancing 3 x joint salary for a couple (and this is being very generous in today’s mortgage market) the most a couple could borrow would be £141,660 meaning they would require a deposit of some £107,162 to purchase the smallest of the properties currently on offer in Wilton. Even allowing for the complex allowances explained to me by Ms Smith the 30% affordable housing would be way out of the pocket of most young residents of Harnham. I therefore object to these homes on the grounds that they would go no way whatsoever to easing the current shortage of affordable housing in the area.</p>				

16. The actual need for these new private sale houses should be called to question in general. I would point all readers to Private Eye, Issue No. 1449 28 July-10 August 2017, Page 11 "Housing News" (if anyone reading this cannot access the article please let me know and I will happily send you a copy!). This article states as follows: "Latest government figures show the owner-occupation rate in England fell to 63 per cent in 2015-16 – that compares with a peak of 71 per cent in 2003 and takes the rate back to levels last seen in the mid 1980's, when Margaret Thatcher's drive for a home-owning democracy was at its peak". The article then goes on to state that the figures conceal even bigger declines for younger families. Although outright ownership is still rising as pensioners pay off their mortgages, the rate of mortgaged ownership has fallen from 43 per cent in the early 1990's to just 29 per cent in 2015-16. The article quotes Sajid Javid as declaring war on Conservative councils in the Home Counties. Might I suggest looking at these figures and the cost of housing in this area and the lack of affordable rentable housing, let alone purchasing, that Wiltshire Council wishes to be seen to be "doing its bit" to meet the communities secretary's demands but without actually addressing those in the local area requiring proper affordable homes on the local salaries available? One other "grey" area I wish to mention is the help provided by the "bank of Mum and Dad" or the "bank of Grandma/Grandpa". I personally know many people in my own age group and above who have taken equity from their own homes (often purchased through the Right to Buy) to provide deposits to help their children and grandchildren on to the housing ladder. With the suggestion in the Tory manifesto that those requiring social service help in their own homes have the value of their homes taken into account surely there is a very real risk that these "banks" may have to close in the very near future! Perhaps the Council/Government should consider this policy at this stage rather than years down the line when the houses are actually being built.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	279	Consultee Dave Brown	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120337		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>looking at all three sites, the A363 White Horse Business Park is clearly the least sensible: a capacity of 338, reduced to 150 due to 'mitigating factors'. This site will not solve the housing issue in Trowbridge; compared to the other two proposed sites it offers really poor value in respect to what the plan sets out to achieve. The location of the site also begs questions about access to it, as Woodmarsh is a residential road which already suffers from speeding (Councillor Prickett is campaigning for speeding measures due to the already excessive use of the road); as already noted the build up of traffic on Bradley Road is already bad and the use of Southwick Road going to the A36 is overused by heavy goods vehicles that speed into the village. The access to Yarnbrook is, and has been problematic for years, and is often queuing back to North Bradley as things stand. This proposed site will only add to the already problematic traffic congestion.</p> <p>Perhaps the most pertinent point against the development though, which is based on a precedent made by Wiltshire Council at the Paxcroft development, is that the building on the fields behind Woodmarsh will result in the joining up of Trowbridge and North Bradley, meaning that North Bradley will ultimately lose its independent village status. When the Paxcroft estate was built some years ago, it was only granted due to an agreed plan to leave a strip of fields between the village and the new estate, therefore ensuring that the Village of Hilperton remained separate to Trowbridge. I would like to think that this policy would extend to all villages surrounding Trowbridge and not just to villages that have influential Wiltshire Councillors in them.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	280	Consultee Dave Brown	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120337		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	of the three sits, the most logical site to develop would be the Southwick Court site, as this will then have the benefit of multiple access points through the already well served and accessed College estate area and Boundary Walk area - most areas of Boundary walk already have 'dead end' roads, that would be easily converted to access roads for the new build. it does not run the risk of Southwick losing its independence and offers relatively good value for money in respect to houses lost for mitigating factors.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	281	Consultee Dr Trevor Wilson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124300		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5..134			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	three areas spring to mind initially on review. 5.134 - the site has barrows and similar already recognised as significant - with no plan or proposal to mitigate or manage				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	depends upon the data provided to be frank, however, a discussion on the subject wouldnt harm the proposal, as in its present form, the proposal feels flawed in its overall logic				

Comment ID:	282	Consultee Tessa Welbourn	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120376	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The road system can not cope with more houses and more cars as traffic is already at a standstill in North Bradley both into Trowbridge and up to West Ashton causing pollution.				
Attached files (Please see Objective)	4692062				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	283	Consultee Mrs Carol Hackett Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Market Lavington Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.3 Market Lavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Attached submission sets out representation in full.] 2.0 Boundary Changes Generally, the boundary review seems to be sensible. However, the PC has the following comments. Numbers refer to those on the sketch map below. [see map in attachment] 2.1 Specific comments: 1. Keep to existing settlement boundary line. Councillors felt that as it was sited behind the current 'ribbon' development line of the village – not well attached to the urban framework, and was therefore not suitable for any possible future development, and as such should not be included within the settlement boundary. 2. Keep to existing settlement boundary line - The Fiddington Nursery site – Councillors wanted to retain the potential employment uses for this site to keep the settlement sustainable and not encourage re-development / not well attached to the urban framework. 3. The Wiltshire Council proposal encompasses the 'Southcliffe' site, as proposed in the Neighbourhood Plan, as well as some industrial units at the end. Councilors do not want the area highlighted in green to be included in the settlement boundary i.e. the industrial units (to retain the potential employment uses for this site to keep the settlement sustainable and not encourage redevelopment / not well attached to the urban framework). 4. Keep to existing settlement boundary line – There are no residential properties on this site, rather just disused farm buildings - barns and sheds. 5. Keep to existing settlement boundary line – Commercial yard operation - Councillors wanted to retain the potential employment uses for this site to keep the settlement sustainable and not encourage re-development / not well attached to the urban framework. 2.2 Regarding sites proposed in the Market Lavington NDP (see map below), the Neighbourhood Pan has the power to amend the settlement boundary de facto by allocating such sites. It is up to Wiltshire Council whether they chose to revise the settlement boundary to accommodate these or let the NDP do it.</p>				
Attached files (Please see Objective)	4704133				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	284	Consultee Mrs Carol Hackett Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Market Lavington Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Market Lavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	[Attached submission sets out representation in full.] There was no specific attempt that we are aware of to co-ordinate site selection in NDP's and the DPD. This and the role of the Link Officer (who could have fulfilled this function) are discussed later in this response. However it is worth quoting the NPPF here. This says: 155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made. It is felt that the early engagement of the DPD team with the Neighbourhood Plan Steering Group in Market Lavington did not reach the standard set by the NPPF.				
Attached files (Please see Objective)	4704133				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	285	Consultee Mrs Carol Hackett Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Market Lavington Parish Council Person ID: 924012		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.3 Southcliffe			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Attached submission sets out representation in full.]</p> <p>3.6 Shared Sites The following sites are proposed in both DPD and NDP. Reasons for inclusion in the NDP are indicated in the AECOM Report, the Scoping Report, Consultation Statement and NDP itself (see appendices for extracts). The Parish Council therefore supports the inclusion of the following in the Wiltshire Housing Site Allocations DPD. Site boundaries should be harmonised. [refer to table in attached submission]</p> <p>3.10 Paragraph 47 of the NPPF allows Councils to set locally appropriate density levels. Given the evidence from the HNS and Community Engagement on the NDP, the Parish Council requests that the number suggested for the DPD sites are revised upwards to meet those of the NDP which reflect local circumstances more accurately.</p>				
Attached files (Please see Objective)	4704133				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	286	Consultee Mrs Carol Hackett Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Market Lavington Parish Council Person ID: 924012		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.4 East of Lavington School			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Attached submission sets out representation in full.]</p> <p>3.6 Shared Sites The following sites are proposed in both DPD and NDP. Reasons for inclusion in the NDP are indicated in the AECOM Report, the Scoping Report, Consultation Statement and NDP itself (see appendices for extracts). The Parish Council therefore supports the inclusion of the following in the Wiltshire Housing Site Allocations DPD. Site boundaries should be harmonised. [refer to table in attached submission]</p> <p>3.10 Paragraph 47 of the NPPF allows Councils to set locally appropriate density levels. Given the evidence from the HNS and Community Engagement on the NDP, the Parish Council requests that the number suggested for the DPD sites are revised upwards to meet those of the NDP which reflect local circumstances more accurately.</p>				
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Comment ID:	287	Consultee Mrs Carol Hackett Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Market Lavington Parish Council Person ID: 924012		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Attached submission sets out representation in full.] 3.7 Sites included in DPD not included in NDP The following site is not included in the NDP. It is requested that this site be removed from the DPD for the reasons shown. [refer to table in attachment]</p>				
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If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	288	Consultee Mrs Carol Hackett Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Market Lavington Parish Council Person ID: 924012		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery			
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Comment ID:	289	Consultee Mrs Carol Hackett Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Market Lavington Parish Council Person ID: 924012		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Attached submission sets out representation in full.] 3.7 Sites included in DPD not included in NDP The following site is not included in the NDP. It is requested that this site be removed from the DPD for the reasons shown. [refer to table in attachment]</p>				
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Comment ID:	291	Consultee Mrs Carol Hackett Clerk Market Lavington Parish Council Person ID: 924012	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
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Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Attached submission sets out representation in full.]</p> <p>3.0 DPD and NDP Sites</p> <p>It is unfortunate that the site selection methodology used by the DPD did not include consultation prior to draft allocation of all possible sites with the neighbourhood planning groups that Wiltshire Council knew were emerging at the time. In the view of the Parish Council, this is a serious error that could bring into question the soundness of the DPD, in particular in relation to its Duty to Co-Operate. While Parish Councils were consulted, NDP steering groups are often semi-autonomous sub-groups that may not necessarily receive a consultation sent to the PC. There was no specific attempt that we are aware of to co-ordinate site selection in NDP's and the DPD. This and the role of the Link Officer (who could have fulfilled this function) are discussed later in this response. However it is worth quoting the NPPF here. This says: 155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made. It is felt that the early engagement of the DPD team with the Neighbourhood Plan Steering Group in Market Lavington did not reach the standard set by the NPPF.</p> <p>3.1 The Market Lavington NDP has in fact been growing and developing for some three years. Prior to the formal decision being made to produce a Neighbourhood Plan, information was provided by the Parish Council, and the views sought from members of the community at various events. The Public Open Meeting held on the 6th of May 2014 led to the formation of the Neighbourhood Planning Steering Group, made up of representatives from the Parish Council and the local community. The first Steering Group meeting was held on the 23rd June 2014, and meetings have been held on a monthly basis throughout the process. The Draft Consultation Statement (Extract as Appendix 2) indicates the very extensive community involvement so far, as does the ENACT report (Extract Appendix 5). This includes a whole programme of events as well as a detailed questionnaire which was professionally analysed.</p> <p>3.2 In addition to the fact that the sites selected for the NDP reflect the wishes of the community, extensive objective research was also undertaken and incorporated within a Scoping Report. This includes an expert report from consultants 'AECOM' which rigorously assessed the sites, a Housing Needs Survey (HNS) produced by Wiltshire Council in February 2017, and further assessment in the sites section of the NDP itself (see Appendix 3).</p> <p>3.3 The Parish Council is therefore extremely confident that the sites selected in the draft NDP are soundly selected, are suitable, viable and available and will meet the needs of the area as identified in the Wiltshire Core Strategy.</p> <p>3.4 In Market Lavington's case, early consultation would therefore have revealed that an extensive (and expensive) site selection process had already generated a series of preferred sites and that moreover these reflected not only practical evidence such as expert reports and Wiltshire Council's own HNS and SHLAA, but also the wishes of the community.</p>				

	<p>3.5 However the Parish is now faced with a list of proposed DPD sites which do not completely agree with those in the emerging neighbourhood plan, which is close to beginning its Regulation 14 consultation.</p> <p>4.0 General Comments on the DPD and Neighbourhood Planning Process The publication of the DPD consultation has brought to a head some concerns that the Parish Council has regarding the management of neighbourhood planning in Wiltshire.</p> <p>4.1 In terms of the Sites DPD, it is regrettable that there has been little direct effort to co-ordinate the DPD with evolving NDP's. In the case of Market Lavington for example, our link officer kindly provided us with site maps for our plan back in March, yet this activity does not seem to have been fed back to the DPD team at Wiltshire Council – in any event no one contacted us to discuss the implications of having two separate sets of proposals.</p> <p>4.2 More worryingly, one of our plan team who spoke to Sophie in your Spatial Planning Team was recently informed that; 'Wiltshire Council could only take into account the recommendation of a Neighbourhood Plan, regarding assessment of sites, once it had reached the 'Regulation 16 stage' . If this does indeed indicate the attitude of Wiltshire Council to the role of neighbourhood planning then it is most concerning. As you will know, Annex 1. Paragraph 216 of the NPPF says: From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to: the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).</p> <p>4.3 Planning Practice Guidance Neighbourhood Planning para 07 adds: 'An emerging neighbourhood plan may be a material consideration. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies.... Decision makers should respect evidence of local support prior to referendum when seeking to apply weight to an emerging neighbourhood plan.It is for the decision maker in each case to determine what a material consideration is and what weight to give it.'</p> <p>4.4 It seems as if Wiltshire Council's view differs somewhat from that of the Government and we would seek assurances that this is not the case and specifically that the advice given by a staff member (above) that a neighbourhood plan was effectively irrelevant prior to the Reg 16 stage is incorrect. In terms of creating DPD documents, an emerging neighbourhood plan should be taken account of from the moment it is created and weight duly attached according to its stage of progress. We would like this also to be made clear to all Wiltshire Council planners.</p>
<p>Attached files (Please see Objective)</p>	<p>4704133</p>
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Comment ID:	292	Consultee Mrs Carol Hackett Clerk Market Lavington Parish Council Person ID: 924012	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Attached submission sets out representation in full.]</p> <p>1.3 The way that the DPD process has been managed is also of some concern, especially in terms of what this seems to indicate about the attitude of Wiltshire Council to Neighbourhood Planning. This is the subject of a section of more general comments on the DPD.</p> <p>3.0 DPD and NDP Sites</p> <p>It is unfortunate that the site selection methodology used by the DPD did not include consultation prior to draft allocation of all possible sites with the neighbourhood planning groups that Wiltshire Council knew were emerging at the time. In the view of the Parish Council, this is a serious error that could bring into question the soundness of the DPD, in particular in relation to its Duty to Co-Operate. While Parish Councils were consulted, NDP steering groups are often semi-autonomous sub-groups that may not necessarily receive a consultation sent to the PC. There was no specific attempt that we are aware of to co-ordinate site selection in NDP's and the DPD. This and the role of the Link Officer (who could have fulfilled this function) are discussed later in this response. However it is worth quoting the NPPF here. This says:</p> <p>155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>It is felt that the early engagement of the DPD team with the Neighbourhood Plan Steering Group in Market Lavington did not reach the standard set by the NPPF.</p> <p>3.1 The Market Lavington NDP has in fact been growing and developing for some three years. Prior to the formal decision being made to produce a Neighbourhood Plan, information was provided by the Parish Council, and the views sought from members of the community at various events. The Public Open Meeting held on the 6th of May 2014 led to the formation of the Neighbourhood Planning Steering Group, made up of representatives from the Parish Council and the local community. The first Steering Group meeting was held on the 23rd June 2014, and meetings have been held on a monthly basis throughout the process. The Draft Consultation Statement (Extract as Appendix 2) indicates the very extensive community involvement so far, as does the ENACT report (Extract Appendix 5). This includes a whole programme of events as well as a detailed questionnaire which was professionally analysed.</p> <p>3.2 In addition to the fact that the sites selected for the NDP reflect the wishes of the community, extensive objective research was also undertaken and incorporated within a Scoping Report. This includes an expert report from consultants 'AECOM' which rigorously assessed the sites, a Housing Needs Survey (HNS) produced by Wiltshire Council in February 2017, and further assessment in the sites section of the NDP itself (see Appendix 3).</p> <p>3.3 The Parish Council is therefore extremely confident that the sites selected in the draft NDP are soundly selected, are suitable, viable and available and will meet the needs of the area as identified in the Wiltshire Core Strategy.</p>				

3.4 In Market Lavington’s case, early consultation would therefore have revealed that an extensive (and expensive) site selection process had already generated a series of preferred sites and that moreover these reflected not only practical evidence such as expert reports and Wiltshire Council’s own HNS and SHLAA, but also the wishes of the community.

3.5 However the Parish is now faced with a list of proposed DPD sites which do not completely agree with those in the emerging neighbourhood plan, which is close to beginning its Regulation 14 consultation.

4.0 General Comments on the DPD and Neighbourhood Planning Process

The publication of the DPD consultation has brought to a head some concerns that the Parish Council has regarding the management of neighbourhood planning in Wiltshire.

4.1 In terms of the Sites DPD, it is regrettable that there has been little direct effort to co-ordinate the DPD with evolving NDP’s. In the case of Market Lavington for example, our link officer kindly provided us with site maps for our plan back in March, yet this activity does not seem to have been fed back to the DPD team at Wiltshire Council – in any event no one contacted us to discuss the implications of having two separate sets of proposals.

4.2 More worryingly, one of our plan team who spoke to Sophie in your Spatial Planning Team was recently informed that; ‘Wiltshire Council could only take into account the recommendation of a Neighbourhood Plan, regarding assessment of sites, once it had reached the ‘Regulation 16 stage’ .

If this does indeed indicate the attitude of Wiltshire Council to the role of neighbourhood planning then it is most concerning. As you will know, Annex 1. Paragraph 216 of the NPPF says:

From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

4.3 Planning Practice Guidance Neighbourhood Planning para 07 adds:

‘An emerging neighbourhood plan may be a material consideration. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies.... Decision makers should respect evidence of local support prior to referendum when seeking to apply weight to an emerging neighbourhood plan.It is for the decision maker in each case to determine what a material consideration is and what weight to give it.’

4.4 It seems as if Wiltshire Council’s view differs somewhat from that of the Government and we would seek assurances that this is not the case and specifically that the advice given by a staff member (above) that a neighbourhood plan was effectively irrelevant prior to the Reg 16 stage is incorrect. In terms of creating DPD documents, an emerging neighbourhood plan should be taken account of from the moment it is created and weight duly attached according to its stage of progress. We would like this also to be made clear to all Wiltshire Council planners.

Attached files (Please see Objective)

4704133

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	293	Consultee Mrs Carol Hackett Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Market Lavington Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Attached submission sets out representation in full.] 3.8 Sites not Included in the DPD but in the NDP Two sites have been selected by the NDP that have not been taken forward via the DPD. These NDP selected SHLAA sites are suitable, available and viable and reflect the desire of the community for smaller developments around the edges of the settlement and avoidance of larger ones, especially close to the centre or near sensitive road junctions. [refer to table in attachment]</p>				
Attached files (Please see Objective)	4704133				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	294	Consultee Mr Martin Wright Person ID: 1124309	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On 6th September I attended a meeting by Harnham Neighbourhood Association to hear about plans to build 640 homes south of the Netherhampton Road (on the Livestock Market side) and 100 on the north side. The probable requirement for a new doctors' surgery, primary school and shops was also mentioned.</p> <p>I was concerned at the impact such a development would have on the local infrastructure including the feeder links (mainly the Harnham/Netherhampton Roads) and the bridge choke points the capacity of which cannot, realistically, be increased. I was given sight of the Wiltshire Housing Site Allocations Plan dated 22st August which acknowledges that the impact of such a large development on transport capacity and general infrastructure has not yet been fully assessed. For example, a document called the Salisbury Transport Strategy states that, at present,;</p> <p>the Harnham Gyratory (is) in the 'red' category – operating over 70% of capacity (or with two or more arms operating in excess of 90% of capacity).</p> <p>There has been no effective monitoring of the transport impacts arising from those proposed developments around Salisbury.</p> <p>As a resident of Harnham I daily experience the holdups which occur on the Harnham/Netherhampton road under normal circumstances and the long holdups which occur when there is even the slightest blockage to traffic flow. There are houses along either side of much of its length so widening of the road would not be possible. I conclude that the development as proposed is utterly impracticable.</p> <p>The proposed development will only work if a supporting traffic system is constructed to take some of the pressure off the narrow Harnham/Netherhampton Road. Otherwise there will be daily gridlock.</p> <p>Please also consider the impact of large expanses of concrete and tarmac in a new built up area across much of the valley in the Netherhampton area. The river Nadder is prone to flooding. A large amount of extra water flowing directly into it will make it more likely to break its banks and flood downstream - including lower Harnham</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	295	Consultee Mr Steven Rose	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124372		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		298			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In the 2015 core plan it is recognized that the villages surrounding Trowbridge have a separate and distinct identities as villages. Open countryside should be maintained to protect the character. Also the regeneration of central Trowbridge should be a priority. As far as I can see this goes against this plan and make North Bradley part of Trowbridge. It states that the housing number will be limited to 150 on this site, but what guarantee is there for this and also stated are the benefits of affordable housing. There is no guarantee of this either. It says it boosts public open space and biodiversity. What is better than open countryside for open space and wild life. There are plenty of brown field sites in Trowbridge to cater for the extra allocation if required				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	296	Consultee Dr Trevor Wilson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124300		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5..134			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	5.135 - the SSSI and CWS in the immediate proximity - the text discusses a need to mitigate/provide positive management that these areas are not impacted. other than a rather vague proposal to create other areas to walk dog (for example) there appears very little to no consideration in real practical terms how this could be managed with an extra 640 houses next door				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	depends upon the data provided to be frank, however, a discussion on the subject wouldnt harm the proposal, as in its present form, the proposal feels flawed in its overall logic				

Comment ID:	297	Consultee Dr Trevor Wilson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124300		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5..134			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5.136 - transport - the text refers to a transport plan - i cannot find this anywhere so i would like to see more please - however prior to reading this some thoughts. a) the netherhampton road is already used as a sudo bypass for the already overloaded local roads, and as obviously apparent recently (summer 2017) the reduction in capacity in 1 of the 2 bridges over the Avon this summer caused huge traffic issues. given the space available eitherside of the highway from the racecourse down to the A354 junction is limited, its doesnt seem practical to increase the width/capacity of the A3094, thus the only solution (i assume) is to accept worse congestion or improve the road over towards quidhampton. either solution feels flawed especially as it appears the plans do not include a supermarket etc, thus forcing extra traffic into the already overloaded ring road of Salisbury, difficult at present to comment pro-actively without being able to review the "Salisbury Transport Strategy"				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	depends upon the data provided to be frank, however, a discussion on the subject wouldnt harm the proposal, as in its present form, the proposal feels flawed in its overall logic				

Comment ID:	298	Consultee Mrs Alison Edward-Smithson Person ID: 1124180	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury.</p> <p>The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary?</p> <p>The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 1277 dwellings that the planners have suggested would be possible.</p> <p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <p>The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”.</p> <p>Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”</p> <p>No other small village has been swamped in this way.</p> <p>There is no way that such a large number of dwellings could become part of the parish community in the way that I hope the farm development residents would.</p> <p>A smaller number of dwellings with a definite low limit which is sustainable within the village parish and the infrastructure, prevented from being expanded piecemeal over time when the sustainable first stage has been forgotten and other small developments added to other areas of South Wiltshire that can equally sustain a few houses. It would give a better environment for the residents of these houses too. It would not have the economies of scale nor the disadvantages and would enhance the country not be to its detriment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations that I and others have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE deciding whether to adopt this Housing Site Allocation Plan.				

Comment ID:	299	Consultee Mrs Alison Edward-Smithson Person ID: 1124180	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3		Positively prepared	Justified
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE</p> <p>Para 5.128 of the Draft Allocation Plan says: “The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS”. This is simply not true.</p> <p>The “Salisbury Transport Strategy” (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed.</p> <p>Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: “Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy.”</p> <p>It should also be noted that such “Salisbury Transport Strategy” as exists is not detailed and has never been subject to public consultation or formal adoption.</p> <p>Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end.</p> <p>We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague “solutions” should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through.</p> <p>There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess.</p> <p>We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all.</p> <p>Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.</p> <p>There is an extremely likely outcome that these issues will be described as 'noted' and that the authorities 'are aware' but in reality they will be submergered by the desire to build and we will all regret the consequences.</p>			

	<p>A smaller number of dwellings with a definite low limit which is sustainable within the village parish and the infrastructure, prevented from being expanded piecemeal over time when the sustainable first stage has been forgotten and other small developments added to other areas of South Wiltshire that can equally sustain a few houses. It would give a better environment for the residents of these houses too. It would not have the economies of scale nor the disadvantages and would enhance the country not be to its detriment.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations that I and others have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE deciding whether to adopt this Housing Site Allocation Plan.</p>

Comment ID:	300	Consultee Mrs Alison Edward-Smithson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124180	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>FLOOD & SEWAGE IMPACT</p> <p>Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites.</p> <p>Site S1027 is well known locally for having standing water regularly during the winter.</p> <p>There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity.</p> <p>This is another hazard and consequence that must not be ignored. In addition, does the sewerage system from the area pass under the sites in question ?</p> <p>A smaller number of dwellings with a definite low limit which is sustainable within the village parish and the infrastructure, prevented from being expanded piecemeal over time when the sustainable first stage has been forgotten and other small developments added to other areas of South Wiltshire that can equally sustain a few houses. It would give a better environment for the residents of these houses too. It would not have the economies of scale nor the disadvantages and would enhance the country not be to its detriment.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The consultation has been drawn up without proper regard for the many considerations that I and others have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE deciding whether to adopt this Housing Site Allocation Plan.			

Comment ID:	301	Consultee Mrs Alison Edward-Smithson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124180	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>NOISE</p> <p>A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.</p> <p>It is already very difficult to hear someone in my garden due to the road noise. I accept that has always been the case but it would be significantly worse if the number of cars increase on this scale.</p> <p>A smaller number of dwellings with a definite low limit which is sustainable within the village parish and the infrastructure, prevented from being expanded piecemeal over time when the sustainable first stage has been forgotten and other small developments added to other areas of South Wiltshire that can equally sustain a few houses. It would give a better environment for the residents of these houses too. It would not have the economies of scale nor the disadvantages and would enhance the country not be to its detriment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations that I and others have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE deciding whether to adopt this Housing Site Allocation Plan.				

Comment ID:	302	Consultee Mrs Alison Edward-Smithson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124180	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is no consistent pavement from the village to any bus stop in Harnham. Has a bus been considered now? My daughter has to walk to Harnham to get a bus to Salisbury to get a connecting bus to school in Fordingbridge. She has to cross the Netherhampton Road at a few points to avoid walking through muddy verge. The risk of this will increase with higher volume of speeding cars in the non-rush hour daytime hours. I am concerned about this. A smaller number of dwellings with a definite low limit which is sustainable within the village parish and the infrastructure, prevented from being expanded piecemeal over time when the sustainable first stage has been forgotten and other small developments added to other areas of South Wiltshire that can equally sustain a few houses. It would give a better environment for the residents of these houses too. It would not have the economies of scale nor the disadvantages and would enhance the country not be to its detriment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations that I and others have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE deciding whether to adopt this Housing Site Allocation Plan.</p>				

Comment ID:	303	Consultee Mrs Alison Edward-Smithson Person ID: 1124180	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site nos. H3.1 and H3.3			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	FLAWED PROCESS We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process. The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed. The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan. The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain. A smaller number of dwellings with a definite low limit which is sustainable within the village parish and the infrastructure, prevented from being expanded piecemeal over time when the sustainable first stage has been forgotten and other small developments added to other areas of South Wiltshire that can equally sustain a few houses. It would give a better environment for the residents of these houses too. It would not have the economies of scale nor the disadvantages and would enhance the country not be to its detriment.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations that I and others have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE deciding whether to adopt this Housing Site Allocation Plan.				

Comment ID:	304	Consultee Mrs Alison Edward-Smithson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124180	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>VISUAL AMENITY / HERITAGE LANDSCAPE</p> <p>The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset.</p> <p>GENERALLY ILLOGICAL</p> <p>No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school.</p> <p>The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all.</p> <p>The comments here are serious and well-considered. Please respect that and take them onboard.</p> <p>A smaller number of dwellings with a definite low limit which is sustainable within the village parish and the infrastructure, prevented from being expanded piecemeal over time when the sustainable first stage has been forgotten and other small developments added to other areas of South Wiltshire that can equally sustain a few houses. It would give a better environment for the residents of these houses too. It would not have the economies of scale nor the disadvantages and would enhance the country not be to its detriment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations that I and others have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE deciding whether to adopt this Housing Site Allocation Plan.				

Comment ID:	305	Consultee Mr Ian Goddard Person ID: 1124133	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1 Netherhampton Road, Salisbury			Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Harnham already has a site of employment land in front of Bookers which has not attracted development for many years. The inclusion of land for employment on this new site seems unnecessary given the lack of interest that has clearly been demonstrated. The development in Netherhampton Road should be removed from the plan or significantly scaled back. The original plans for Churchfields should proceed and other, more suitable sites across Wiltshire should be found to make up any shortfall if it arises. More generally, the plan provides for a surplus of 937 houses in South Wiltshire and 577 in Salisbury, compared with the indicative requirement. It is not justified to provide a surplus against this target if that involves development of greenfield sites. Once this agricultural land is lost, it cannot be replaced. One of the reasons given for using Salisbury as a primary focus for development is that it will provide significant levels of jobs. I would argue that this logic is flawed. Salisbury does not appear to have attracted new employers and we have seen some larger employers leave the City in recent years. The ring-road round Salisbury is the meeting point of many major A-roads and is frequently congested. An increase in housing will increase this traffic and Salisbury does not have the capacity for more traffic on these roads.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	306	Consultee Roger Bacon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121429		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. The destruction of Constable Country which is our heritage, by building this number of houses in a beautiful valley with views of the cathedral would be a tragic loss to all.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	307	Consultee Roger Bacon	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121429	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	4.The site registered as s1027 which is opposite where I live in Wellworthy Drive is only just above the water table and is in danger of flooding if we have the kind of severe rainfall that there has been in recent years.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	308	Consultee Roger Bacon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121429		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This whole proposal suggests that very little thought has really gone into what the knock on effect to the community will be. To the residents of Harnham who moved out to here to be out of town and close to the country will have that snatched from them.</p> <p>To put it plainly this is awful.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	309	Consultee Roger Bacon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121429		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Having received notification of the proposed development along Netherhampton road I have to object in the most strongest of terms on the following grounds.</p> <p>1. The first consideration is of course the addition of 1000+ extra vehicles using the Netherhampton Road on a daily basis, the majority of which will be in the rush hours morning (schools and commuting) afternoon schools again and then the return from work in the evening. The Harnham Gyratory cannot cope now and in the morning the queue can extend back to Parsonage Green and beyond, try putting another 1000 vehicles on that same stretch of road at the same time of the morning.</p> <p>7. There is no real bus service beyond Upper Street, Harnham apart from the twice daily service currently run by Wheelers.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	310	Consultee Mr James Riddell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124064		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is concern over the transport strategy for the A3094 which is the sole road through Harnham and Netherhampton. This road is already very busy with the 2 constriction points at the Harnham gyratory and at the traffic lights at the junction with A36. An earlier report from 2012 stated that both junctions were nearly at full capacity, but there is nothing in the proposals to suggest that is going to be addressed. The above comments refer to the specific sites in Netherhampton Parish and not to the full plan for Wiltshire. Therefore addressing the above concerns would help in respect of Netherhampton.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	311	Consultee Mr James Riddell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124064		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Finally land to the north of the A3094 is prone to flooding in the winter months. The addition of housing on that side of the road will impede the downward flow of water down the valley and could have implications for dwellings further up the valley, namely Netherhampton village itself. Coupled with the increased run off of surface water from the larger settlement proposed for the south side of the A3094 flooding could become a major issue. Currently water on the fields is absorbed into the soil down to the water table and causes little problem. Again no reference is made to how this is to be addressed.</p> <p>The above comments refer to the specific sites in Netherhampton Parish and not to the full plan for Wiltshire. Therefore addressing the above concerns would help in respect of Netherhampton.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	312	Consultee Francesca Vowles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site at Southwick is an old site and has very old hedges which have protection rights by law. There is an abundance of wildlife including the Betchstien bats protected by law, along with green and spotted woodpeckers, swallows in the summer, buzzards, kingfishers at times, deer, many species of finches and starlings roost here in the winter and they are also a protected species.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	313	Consultee Mr Paul Cunningham Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Netherhampton Parish Council Person ID: 1122902		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <p>The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”.</p> <p>Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”</p> <p>Consider the Transport, GI and other impacts carefully BEFORE making housing allocations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	As Chair of the parish in which huge allocations are proposed it would seem unreasonable to say the least for me not to be able to participate in any oral part of the examination in order to represent the very strongly held view of our residents.				

Comment ID:	314	Consultee Francesca Vowles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Lastly on this site, the access will be extremely difficult. Silver Street Lane is a residential Road and does not allow two cars to pass a parked car. If you intend to gain access via Balmoral Road it's even more congested. Access directly on to the Frome Road will cause chaos especially near the Southwick Country Park and especially on a Saturday when they have their Park run and the cars parked all along Frome Road!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	315	Consultee Francesca Vowles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Also on the Boundary Walk site/Southwick Court in the wetter months there has be extensive flooding, which I myself have witnessed, one year it was so bad it was like a lake had been put there, I do have photos, as my children enjoyed playing in it. I've noticed that recently tests have been carried out there and that the soil sample trenches have been logged with OS coordinates and at least one is placed ON TOP of one of the post-medieval earthworks. Given that the brief for soil-sampling is to discover whether there is one metre of unsaturated topsoil to allow soak-away this does not seem to be a solid data point!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	316	Consultee Mr Paul Cunningham Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Netherhampton Parish Council Person ID: 1122902		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
		<p>INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE</p> <p>Para 5.128 of the Draft Allocation Plan says: "The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS". This is simply not true.</p> <p>The "Salisbury Transport Strategy" (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed.</p> <p>Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: "Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy."</p> <p>It should also be noted that such "Salisbury Transport Strategy" as exists is not detailed and has never been subject to public consultation or formal adoption.</p> <p>Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end.</p> <p>We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague "solutions" should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through.</p> <p>There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess.</p> <p>We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all.</p> <p>Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.</p> <p>Consider the Transport, GI and other impacts carefully BEFORE making housing allocations.</p>			
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

As Chair of the parish in which huge allocations are proposed it would seem unreasonable to say the least for me not to be able to participate in any oral part of the examination in order to represent the very strongly held view of our residents.

Comment ID:	317	Consultee Francesca Vowles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122860	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	I do feel that the planners are letting Trowbridge down, I know we need new homes and the fact that Wiltshire county council has told Trowbridge to find sites for a further 700 does not put them in a good light. The population of Trowbridge is approx. 40000 and with all this new housing it will increase by approx. 25 per cent. So allowances must be made for schools and medical facilities along with the emergency services.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	318	Consultee Mr Paul Cunningham Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Netherhampton Parish Council Person ID: 1122902		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLOOD & SEWAGE IMPACT Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites. Site S1027 is well known locally for having standing water regularly during the winter. There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity. Consider the Transport, GI and other impacts carefully BEFORE making housing allocations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	As Chair of the parish in which huge allocations are proposed it would seem unreasonable to say the least for me not to be able to participate in any oral part of the examination in order to represent the very strongly held view of our residents.				

Comment ID:	319	Consultee Mr Paul Cunningham Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Netherhampton Parish Council Person ID: 1122902		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	NOISE A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings. Consider the Transport, GI and other impacts carefully BEFORE making housing allocations.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	As Chair of the parish in which huge allocations are proposed it would seem unreasonable to say the least for me not to be able to participate in any oral part of the examination in order to represent the very strongly held view of our residents.				

Comment ID:	320	Consultee Mr Paul Cunningham Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Netherhampton Parish Council Person ID: 1122902		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>FLAWED PROCESS</p> <p>We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process.</p> <p>The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed.</p> <p>The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan.</p> <p>The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain.</p> <p>Consider the Transport, GI and other impacts carefully BEFORE making housing allocations.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		As Chair of the parish in which huge allocations are proposed it would seem unreasonable to say the least for me not to be able to participate in any oral part of the examination in order to represent the very strongly held view of our residents.			

Comment ID:	321	Consultee Mr Paul Cunningham Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Netherhampton Parish Council Person ID: 1122902		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>VISUAL AMENITY / HERITAGE LANDSCAPE</p> <p>The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset.</p> <p>Consider the Transport, GI and other impacts carefully BEFORE making housing allocations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	As Chair of the parish in which huge allocations are proposed it would seem unreasonable to say the least for me not to be able to participate in any oral part of the examination in order to represent the very strongly held view of our residents.				

Comment ID:	322	Consultee Mr Paul Cunningham Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Netherhampton Parish Council Person ID: 1122902		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GENERALLY ILLOGICAL</p> <p>No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school. The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all. Consider the Transport, GI and other impacts carefully BEFORE making housing allocations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	As Chair of the parish in which huge allocations are proposed it would seem unreasonable to say the least for me not to be able to participate in any oral part of the examination in order to represent the very strongly held view of our residents.				

Comment ID:	323	Consultee Mrs S K Evans	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448144	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Why not put the school on vacant land in Churchfields – walking distance for many students, plenty of bus routes into the city and the railway station to cope with transportation?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	324	Consultee Mrs S K Evans	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448144	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The fields on the city side of the road are frequently flooded and development would damage the outstanding view of the Cathedral approaching from the West. It would be a very bad idea to increase the potential for flooding in the city thanks to run off from development up the hillside and building on the floodplain.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	325	Consultee Mrs S K Evans	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448144	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	An industrial/business park has been proposed in that location several times but the factory that was there closed down and could not be sold for employment land only for housing. A new business park has been open for many years and has only attracted one business as its former site in Harnham was developed for housing as businesses see the accessibility as unacceptable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	326	Consultee Mrs S K Evans	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448144	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Small scale development would be OK but Harnham has enough houses, 100s have been built around here in the last 25 years alone between Downton Road and Odstock Road. The infrastructure is inadequate and residents are very much against it.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	327	Consultee Mrs Judith Howles Person ID: 1120809	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1 Netherhampton Road Salisbury			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site allocations are taken from the starting point of the SHLAA and are reactive to proposals put forward by landowners. The LPA has not sought to identify sites that could best utilise existing infrastructure, minimise impact on the landscape setting of Salisbury or relate to the location of employment.</p> <p>It should be set out on a site by site basis how the key challenges of the Wiltshire Core Strategy have been met .</p> <p>The plan seeks to concentrate development in the principal settlements but in the Salisbury area, employment patterns are more dispersed. (these range from large employers such as Porton Down to the numerous conversions of farm buildings to business purposes) Also modern lifestyles with an increase in remote working and internet shopping reduces the need for development to be concentrated in large sites on the edge of towns. A more dispersed pattern allowing more development in villages would have less landscape impact and make better use of existing resources. The Community Infrastructure Levy facilitates such an approach and reduces the need for large sites .</p> <p>The configuration of Salisbury as a convergence of routes at the confluence of several rivers and enclosed by hills makes any expansion of the settlement difficult without significant impacts in terms of landscape setting and heritage , traffic congestion and reduction in air quality , flood risk and drainage . A more thorough appraisal of existing infrastructure should be undertaken and a detailed updated transport strategy should be published before greenfield sites with no existing infrastructure outside the city boundary are allocated . The existence of a ring of park and ride sites lends itself to satellite development leaving green space around the city.</p> <p>The comprehensive improvements to the local and strategic road network referred to in para. 5.136 should be put forward in detail before this site is allocated as there is local opinion (as demonstrated by the comments at the meeting on 6 September) that the scale of improvements required to accommodate additional traffic that will be generated from this site are neither achievable nor deliverable.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To challenge the assumptions that have been made in light of a lack of detailed proposals to mitigate identified adverse impacts, unless they are adequately addressed In advance of the examination.				

Comment ID:	328	Consultee Mr. Paul Cunningham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 862429	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <p>The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”.</p> <p>Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”</p> <p>Consider the transport, Green Infrastructure and all other issues properly BEFORE making housing allocations</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	329	Consultee Mr R W Conway	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1121687		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Please note my sincere disgust at the proposed building plans for new homes along Boundary Walk in Trowbridge. The countryside along Boundary Walk & across to Southwick provides Bradley Gardens Estate with an area of peace & quiet; many people have bought their properties for exactly that reason including myself. All the hedgerows & trees are protected by law & any workmen could be challenged & the police called if they tried to remove them.</p> <p>I guarantee you would be up in arms at the thought of the outside of your home was going to be turned into a building site for god knows how long. I hope you all sit down & re-think as this plan is a no-go & will be resisted at every stage.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	330	Consultee Mr. Paul Cunningham Person ID: 862429	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
		INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE Para 5.128 of the Draft Allocation Plan says: "The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS". This is simply not true. The "Salisbury Transport Strategy" (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed. Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: "Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy." It should also be noted that such "Salisbury Transport Strategy" as exists is not detailed and has never been subject to public consultation or formal adoption. Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end. We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague "solutions" should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through. There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess. We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all. Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out. Consider the transport, Green Infrastructure and all other issues properly BEFORE making housing allocations			
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.

Comment ID:	331	Consultee Mr. Paul Cunningham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 862429		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>FLOOD & SEWAGE IMPACT</p> <p>Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites.</p> <p>Site S1027 is well known locally for having standing water regularly during the winter.</p> <p>There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity.</p> <p>Consider the transport, Green Infrastructure and all other issues properly BEFORE making housing allocations</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.			

Comment ID:	332	Consultee Mr. Paul Cunningham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 862429	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>NOISE</p> <p>A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.</p> <p>Consider the transport, Green Infrastructure and all other issues properly BEFORE making housing allocations</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	333	Consultee Mr. Paul Cunningham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 862429	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>FLAWED PROCESS</p> <p>We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process.</p> <p>The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed.</p> <p>The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan.</p> <p>The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain.</p> <p>Consider the transport, Green Infrastructure and all other issues properly BEFORE making housing allocations</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.			

Comment ID:	334	Consultee Mr. Paul Cunningham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 862429	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>VISUAL AMENITY / HERITAGE LANDSCAPE</p> <p>The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset.</p> <p>Consider the transport, Green Infrastructure and all other issues properly BEFORE making housing allocations</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	335	Consultee Mr. Paul Cunningham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 862429		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 and S1028		Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GENERALLY ILLOGICAL</p> <p>No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school.</p> <p>The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all.</p> <p>Consider the transport, Green Infrastructure and all other issues properly BEFORE making housing allocations</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	336	Consultee Mrs Judith Howles Person ID: 1120809	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1 Netherhampton Road Salisbury			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In relation to this site, there is insufficient detail provided to demonstrate how the road infrastructure could be modified to accommodate the volume of traffic that will be generated by the scale of development proposed, given the lack of capacity at the junctions either end of the A3094. Without this detail it is impossible to say for certain that the development can be delivered without resulting in significant adverse effects. There may be more appropriate sites, better related to existing infrastructure that do not appear to have been considered. e. g close to Britford Park and Ride .</p> <p>The proposed site is not sustainable owing to the lack of adequate infrastructure . It will encourage car use out of necessity (contrary to the objectives of the transport strategy) as it is not within reasonable walking distance of town, it is not served by buses, it relates poorly to the location of existing primary and secondary schools and there are no shops, community facilities and little employment within walking distance. Therefore the site does not meet the key challenges of the Wiltshire Core Strategy set out in para. 2.5.</p> <p>It should be set out on a site by site basis how the key challenges of the Wiltshire Core Strategy have been met .</p> <p>The configuration of Salisbury as a convergence of routes at the confluence of several rivers and enclosed by hills makes any expansion of the settlement difficult without significant impacts in terms of landscape setting and heritage , traffic congestion and reduction in air quality , flood risk and drainage . A more thorough appraisal of existing infrastructure should be undertaken and a detailed updated transport strategy should be published before greenfield sites with no existing infrastructure outside the city boundary are allocated . The existence of a ring of park and ride sites lends itself to satellite development leaving green space around the city.</p> <p>The comprehensive improvements to the local and strategic road network referred to in para. 5.136 should be put forward in detail before this site is allocated as there is local opinion (as demonstrated by the comments at the meeting on 6 September) that the scale of improvements required to accommodate additional traffic that will be generated from this site are neither achievable nor deliverable.</p> <p>This site at the scale proposed could only be justified if it delivered the Brunel Link/Harnham Relief Road . However, I was advised at the Guildhall consultation session that this proposal is no longer included in the transport strategy.</p> <p>If there is to be no relief road, this site is in the wrong place. Salisbury is ringed by Park and Ride sites that are under utilised, Recent developments, e.g. Old Sarum, Hampton Park, Erskine Barracks Wilton, have fed into these , giving residents of the new homes a frequent bus service into town and establishing a satellite pattern of development linked to infrastructure.</p> <p>On the south side of Salisbury there is land close to Britford Park and Ride and the Hospital (a major employer which benefits from a 10 min frequency bus service) which should be considered in preference; an area which would also be more suitable for a new school as at present children from the E Harnham estates have to cross 2 main roads to walk to school.</p> <p>The sustainability appraisal site s1028 underestimates the adverse effects of the traffic that will be generated by this proposal. The adverse effect along the A3094 and the Harnham Gyratory will not be minor.</p> <p>5.136. What are these improvements? There is no detail and it may not be possible to deliver them without significant harm .For example, there will be a deterioration in air quality along the A3094 from additional traffic. This impacts not only upon residents of the road but children and</p>				

	<p>families walking to school, adversely affecting their health. With an increase in traffic comes an increase in the risk of road traffic accidents. There was an accident leading to a fatality on the A3094 in August. The sustainability appraisal is flawed in its assessment of the magnitude of both positive and negative impacts.</p> <p>5.137 . As above. The site is not well located in relation to the city centre. It too far to reasonably access on foot, it is not served by public transport and the cycle path along the A3094 is on the south side of the road. The Shaftesbury Drove leads away from town towards the racecourse.</p> <p>The route of the former Harnham Relief Road should be safeguarded from any development to enable it to be resurrected in the future.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To challenge the assumptions that have been made in light of a lack of detailed proposals to mitigate identified adverse impacts, unless they are adequately addressed In advance of the examination.</p>

Comment ID:	337	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site is adjacent to the livestock market, a source of noise and smell incompatible with residential amenity. This could lead to conflict.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To challenge the assumptions that have been made in light of a lack of detailed proposals to mitigate identified adverse impacts, unless they are adequately addressed In advance of the examination.				

Comment ID:	338	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		It overestimates the beneficial effects in that it is only the 'affordable' element of the housing that will help meet local needs, and a site which lacks infrastructure and facilities puts extra financial strain on low income households and is therefore unlikely to reduce poverty and deprivation in the wider community. Salisbury has a low average wage with average house prices around 10 times it's average wage. 640 houses will put a strain on existing health and social care services and secondary education which is a negative rather than positive effect.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To challenge the assumptions that have been made in light of a lack of detailed proposals to mitigate identified adverse impacts, unless they are adequately addressed In advance of the examination.			

Comment ID:	339	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>A country park is a waste of good agricultural land. A nation must feed itself as well as house itself. Country parks are better suited to marginal land where there is often more biodiversity.</p> <p>The strategic landscaping should form a westward continuation of the existing tree belt along the A3094 .</p> <p>5.130 The site was previously rejected.</p> <p>To conclude, this site is poorly related to the historic settlement pattern of Salisbury and its existing infrastructure. Sites which can make use of the infrastructure that exists should be put forward in preference. It is too large a site, too great a loss of good agricultural land and extends too far southwards to fit into the landscape setting of Salisbury without harming its character.</p> <p>If, despite strong local objection the allocation prevails, the existing tree belt along the southern boundary of Netherhampton Road should be continued westward and planted in advance of the construction of any buildings.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To challenge the assumptions that have been made in light of a lack of detailed proposals to mitigate identified adverse impacts, unless they are adequately addressed In advance of the examination.				

Comment ID:	340	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5.131 The primary school offer is an irrelevance since where one is needed is in East Harnham to reduce the need for children walking to school to cross busy roads. The site is poorly located in relation to existing secondary schools.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To challenge the assumptions that have been made in light of a lack of detailed proposals to mitigate identified adverse impacts, unless they are adequately addressed In advance of the examination.				

Comment ID:	341	Consultee Mrs Judith Howles	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120809	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5.138 The ability of the sewers to accommodate flows should be established before development is proposed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	342	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is already unused employment land on Netherhampton Road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	343	Consultee Mrs Teresa Strange Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Melksham Without Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Community Area Topic Paper - MELKSHAM - Paragraph 2.7 Housing Requirements Page 6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Melksham Without Parish Council welcome the fact that no more sites for the Melksham Area have been allocated, as it has met its requirement in the Wiltshire Core Strategy by more than 350 dwellings, and thus any more sites are unnecessary.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	344	Consultee Joan Jones Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Friends of Southwick Country Park Person ID: 1122693		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1 The Friends of Southwick Country Park (FoSCP) are concerned about two aspects</p> <p>a) A general increase in the Trowbridge Community Area population leading to increased usage and wear and tear</p> <p>b) Specific effects of and to the three nearby proposed housing sites at Upper Studley, Southwick Court and Church Lane.</p> <p>1.2 The proposed developments do offer the opportunity of mitigating the adverse effects of the general development and possible improvements are put forward.</p> <p>6.3 Development 1021 Church Lane</p> <p>6.3.3 Some of this site is on a flood plain and the land affected should be landscaped to mitigate the affect of the housing from the Park. It should then be donated to Southwick Country Park.</p>				
Attached files (Please see Objective)	4698615				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	345	Consultee Joan Jones Chair Friends of Southwick Country Park Person ID: 1122693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.5				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1 The Friends of Southwick Country Park (FoSCP) are concerned about two aspects</p> <p>a) A general increase in the Trowbridge Community Area population leading to increased usage and wear and tear</p> <p>b) Specific effects of and to the three nearby proposed housing sites at Upper Studley, Southwick Court and Church Lane.</p> <p>1.2 The proposed developments do offer the opportunity of mitigating the adverse effects of the general development and possible improvements are put forward.</p> <p>2.3 Southwick Country Park is also important to the wildlife of the area. It has become a repository for wildlife relocated from development areas. In particular, hundreds of slow worms have been given a new home there.</p> <p>2.4 An application is under way to redesignate the Country park as a Local Nature Reserve. The indications are that this application will be successful.</p> <p>2.5 It should be noted that the Country Park is an effective "green" buffer between Trowbridge Town and Southwick village</p> <p>3 Park Usage</p> <p>3.1 A survey of some aspects of usage has been carried out by Wiltshire Council on a Saturday in July 2013 . Overall usage was not counted but the results of a sample questionnaire show why people visit the park. Dog walking was the most common activity with just over half. The next common reason was running at just under a third of the total. The Parkrun is held every Saturday morning and now attracts over 300. Other reasons were just walking and visiting the Hope Nature Centre. Lesser reasons were observing wildlife, picnicking and playing games.</p> <p>3.2 If usage by runners is 30% and we have 300 runners every Saturday then other usage is running at around 700 people per day.</p> <p>5 Wildlife Considerations</p> <p>5.1 An application is being progressed to achieve "Local Nature Reserve" status for the park. Currently the size of the park is around 140 acres. Although there is a considerable presence of dogs, it is considered that the park will continue to provide good habitat for a wide range of wildlife.</p> <p>5.2 A fear is that increasing human and dog usage will make it less attractive to some species. A considerable amount of help by the planning authority and others will be needed to keep this marvellous resource in good condition.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>6.3 Development 3260 Upper Studley</p> <p>6.2.5 Deciduous trees should be included in the landscaping to afford opportunities to bats to roam into and out of the Country Park by extending their habitat.</p> <p>7 Conclusions</p>				

	7.1 There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.
Attached files (Please see Objective)	4698615
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	346	Consultee Joan Jones Chair Friends of Southwick Country Park Person ID: 1122693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1 The Friends of Southwick Country Park (FoSCP) are concerned about two aspects</p> <p>a) A general increase in the Trowbridge Community Area population leading to increased usage and wear and tear</p> <p>b) Specific effects of and to the three nearby proposed housing sites at Upper Studley, Southwick Court and Church Lane.</p> <p>1.2 The proposed developments do offer the opportunity of mitigating the adverse effects of the general development and possible improvements are put forward.</p> <p>2.3 Southwick Country Park is also important to the wildlife of the area. It has become a repository for wildlife relocated from development areas. In particular, hundreds of slow worms have been given a new home there.</p> <p>2.4 An application is under way to redesignate the Country park as a Local Nature Reserve. The indications are that this application will be successful.</p> <p>2.5 It should be noted that the Country Park is an effective "green" buffer between Trowbridge Town and Southwick village</p> <p>3 Park Usage</p> <p>3.1 A survey of some aspects of usage has been carried out by Wiltshire Council on a Saturday in July 2013 . Overall usage was not counted but the results of a sample questionnaire show why people visit the park. Dog walking was the most common activity with just over half. The next common reason was running at just under a third of the total. The Parkrun is held every Saturday morning and now attracts over 300. Other reasons were just walking and visiting the Hope Nature Centre. Lesser reasons were observing wildlife, picnicking and playing games.</p> <p>3.2 If usage by runners is 30% and we have 300 runners every Saturday then other usage is running at around 700 people per day.</p> <p>5 Wildlife Considerations</p> <p>5.1 An application is being progressed to achieve "Local Nature Reserve" status for the park. Currently the size of the park is around 140 acres. Although there is a considerable presence of dogs, it is considered that the park will continue to provide good habitat for a wide range of wildlife.</p> <p>5.2 A fear is that increasing human and dog usage will make it less attractive to some species. A considerable amount of help by the planning authority and others will be needed to keep this marvellous resource in good condition.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>6.3 Development 3260 Upper Studley</p> <p>6.2.5 Deciduous trees should be included in the landscaping to afford opportunities to bats to roam into and out of the Country Park by extending their habitat.</p> <p>7 Conclusions</p>				

	7.1 There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.
Attached files (Please see Objective)	4698616
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	347	Consultee Joan Jones Chair Friends of Southwick Country Park Person ID: 1122693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.4				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1 The Friends of Southwick Country Park (FoSCP) are concerned about two aspects</p> <p>a) A general increase in the Trowbridge Community Area population leading to increased usage and wear and tear</p> <p>b) Specific effects of and to the three nearby proposed housing sites at Upper Studley, Southwick Court and Church Lane.</p> <p>1.2 The proposed developments do offer the opportunity of mitigating the adverse effects of the general development and possible improvements are put forward.</p> <p>2.3 Southwick Country Park is also important to the wildlife of the area. It has become a repository for wildlife relocated from development areas. In particular, hundreds of slow worms have been given a new home there.</p> <p>2.4 An application is under way to redesignate the Country park as a Local Nature Reserve. The indications are that this application will be successful.</p> <p>2.5 It should be noted that the Country Park is an effective "green" buffer between Trowbridge Town and Southwick village</p> <p>3 Park Usage</p> <p>3.1 A survey of some aspects of usage has been carried out by Wiltshire Council on a Saturday in July 2013 . Overall usage was not counted but the results of a sample questionnaire show why people visit the park. Dog walking was the most common activity with just over half. The next common reason was running at just under a third of the total. The Parkrun is held every Saturday morning and now attracts over 300. Other reasons were just walking and visiting the Hope Nature Centre. Lesser reasons were observing wildlife, picnicking and playing games.</p> <p>3.2 If usage by runners is 30% and we have 300 runners every Saturday then other usage is running at around 700 people per day.</p> <p>5 Wildlife Considerations</p> <p>5.1 An application is being progressed to achieve "Local Nature Reserve" status for the park. Currently the size of the park is around 140 acres. Although there is a considerable presence of dogs, it is considered that the park will continue to provide good habitat for a wide range of wildlife.</p> <p>5.2 A fear is that increasing human and dog usage will make it less attractive to some species. A considerable amount of help by the planning authority and others will be needed to keep this marvellous resource in good condition.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>7.1 There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.</p> <p>2.3 Southwick Country Park is also important to the wildlife of the area. It has become a repository for wildlife relocated from development areas. In particular, hundreds of slow worms have been given a new home there.</p>				

	<p>2.4 An application is under way to redesignate the Country park as a Local Nature Reserve. The indications are that this application will be successful.</p> <p>2.5 It should be noted that the Country Park is an effective "green" buffer between Trowbridge Town and Southwick village</p> <p>3 Park Usage</p> <p>3.1 A survey of some aspects of usage has been carried out by Wiltshire Council on a Saturday in July 2013 . Overall usage was not counted but the results of a sample questionnaire show why people visit the park. Dog walking was the most common activity with just over half. The next common reason was running at just under a third of the total. The Parkrun is held every Saturday morning and now attracts over 300. Other reasons were just walking and visiting the Hope Nature Centre. Lesser reasons were observing wildlife, picnicking and playing games.</p> <p>3.2 If usage by runners is 30% and we have 300 runners every Saturday then other usage is running at around 700 people per day.</p> <p>5 Wildlife Considerations</p> <p>5.1 An application is being progressed to achieve "Local Nature Reserve" status for the park. Currently the size of the park is around 140 acres. Although there is a considerable presence of dogs, it is considered that the park will continue to provide good habitat for a wide range of wildlife.</p> <p>5.2 A fear is that increasing human and dog usage will make it less attractive to some species. A considerable amount of help by the planning authority and others will be needed to keep this marvellous resource in good condition.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.</p>
<p>Attached files (Please see Objective)</p>	<p>4698616</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	348	Consultee Joan Jones Chair Friends of Southwick Country Park Person ID: 1122693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.4				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2 Introduction</p> <p>2.1 Southwick Country Park is an essential part of the recreational facilities in and around Trowbridge. It is used daily by many people for exercise, for social intercourse or for dog walking. Even the latter is beneficial to the health of the dog walker.</p> <p>2.2 On Saturday mornings the main ring path is used by over 300 runners in a Parkrun activity. The number attracted is indicative of the quality of the Country Park environment.</p> <p>4 Current Problems</p> <p>4.1 The park is so popular, it is under considerable stress. The main surfaced ring path is deteriorating under increased usage and FoSCoP is to seek funds to upgrade it.</p> <p>4.2 Parking is a problem. The main car park off Frome Road (A362) is surfaced with unbound material and it needs regular attention to deal with potholes.</p> <p>4.3 Parking for the Hope Centre frequently exceeds the capacity of the tarmacked surface and the grass in the field in front suffers from serious rutting in wet weather. A solution to this problem has not yet been identified. However, the problem cannot be ignored.</p> <p>4.4 On Saturday mornings, for around 2 hours, the parking situation is exacerbated by the cars of those attending Parkrun. Parking lines the A362 Frome Road in the area of the Country Park. It has been brought to the attention of the police. Yellow lines may be required in due course.</p> <p>6 Trowbridge Development</p> <p>6.1 It is estimated that Trowbridge population will increase by around 30% from present levels. Clearly, this is going to greatly exacerbate existing problems, particularly as three of the proposed housing sites are next to the Country Park. These proposed housing areas are sites 1021 Church Lane, 3260 Upper Studley and 3565 Southwick Court.</p> <p>6.3 Development 1021 Church Lane</p> <p>6.3.1 The proposals suggest that access should be directly off A361 to avoid extra traffic on Church Lane.</p> <p>6.3.2 The same considerations apply here about Parkrun parking.</p> <p>The development should provide a small car park for Country Park users and a footbridge over the Lambrok stream to provide pedestrian and wheelchair access to the Park.</p> <p>There should be no argument that Southwick Country Park will have increasing usage because of the increase in population of Trowbridge Community Area. All the developments should be expected to contribute towards measures to alleviate this increased usage and keep the Country Park as an attraction for the benefit of the residents of Trowbridge and the surrounding areas.</p>				
Attached files (Please see Objective)	4698616				
If your representation is seeking a change, do you					

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of the examination?**

Comment ID:	349	Consultee Ann Lee	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 549888	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a resident of North Bradley much of my concern was the proposed allocation of land around the Parish of North Bradley.</p> <p>Buffer Zone - There is a strong determination from residents in the villages outside Trowbridge to maintain the green buffer areas. These are important, the green spaces between villages and town are essential and were recognized in Wiltshire's Core Strategy that these areas were essential to villages such as North Bradley, Southwick, Hilperton and West Ashton for retaining their 'village identity'. Something the present site allocations seem to have completely ignored.</p> <p>3565 Southwick Court AND 298 Woodmarsh: both these, especially the Woodmarsh proposal, would be a cynical further destruction of the buffer between villages and the town.</p> <p>298 Woodmarsh: it became apparent at the Consultation on 26 July that maybe not all landowners have given permission for development of their land. This site should be rejected also in order to preserve the separate identity of North Bradley.</p> <p>More consideration for the villages around Trowbridge of which North Bradley is one. To retain its village status and not become part of a greater Trowbridge.</p>				
Attached files (Please see Objective)	4694108				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	350	Consultee Ann Lee	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 549888		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It would also add considerably to the traffic trying to use the main Bradley Road into Trowbridge - this road is already impossibly congested at peak times by traffic to and from the White Horse Business Park, into te Spitfire Park shopping area, and down to the centre of the town I wish my objection to the proposed development sites of Woodmarsh, Yarnbrook and Southwick Court. sincerely hope that Wiltshire Council will look much more closely at what seems to be a rather cobbled proposal with no thought other than to get as many houses built as possible, no matter what the consequences to the rural/village areas.				
Attached files (Please see Objective)	4694108				
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Comment ID:	351	Consultee Ann Lee	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 549888		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It would also add considerably to the traffic trying to use the main Bradley Road into Trowbridge - this road is already impossibly congested at peak times by traffic to and from the White Horse Business Park, into the Spitfire Park shopping area, and down to the centre of the town I wish my objection to the proposed development sites of Woodmarsh, Yarnbrook and Southwick Court. sincerely hope that Wiltshire Council will look much more closely at what seems to be a rather cobbled proposal with no thought other than to get as many houses built as possible, no matter what the consequences to the rural/village areas.				
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Comment ID:	352	Consultee Ann Lee	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 549888	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	North Bradley, especially along Woodmarsh through to Yarnbrook is home to colonies of Bechsteign Bats. There are also sightings of Horseshoe Bats along Axe and Clever Lane which is part of the proposed land allocation at Southwick Court and along The Rank area of North Bradley.				
Attached files (Please see Objective)	4694108				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	353	Consultee Ann Lee	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 549888		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is understood that plans have already been approved for former office sites in the Business Park (Virgin and Vodafone) to be converted to housing- 140 homes. This does not feature in the SHLAA figures and plan which would reduce the total required ; Sites 261,252, 256, 292: previously advised by the Council that these sites have been rejected as "not to be considered further" for housing. However, when asked where the new Secondary School will be built, we were told that it will be on one of these sites				
Attached files (Please see Objective)	4694108				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	354	Consultee Ann Lee	Agent	Do you consider the draft WHSAP is legally compliant?	
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Could I also ask that any future consultations have more experienced personnel on hand. Consultations are for Wiltshire Council to showcase proposed ideas and show their own professionalism, how knowledgeable they are and how they understand the needs of the county and the community they are representing.				
Attached files (Please see Objective)	4694108				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	355	Consultee Ann Lee Person ID: 549888	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Following my visit to the consultation at Trowbridge on 26 July I would like to make the following comments regarding what would seem to be huge swaths of the Wiltshire countryside being allocated for development. While I, like everyone else, recognise the need for housing the huge swaths of land you had allocated was just unbelievable, never mind distressing. When I asked a member of the consultation team why such huge areas of land were allocated around Wiltshire villages and did the Council not have a duty to protect the countryside as well. I was sharply asked by the young women 'don't you think people have a right to houses'. Well yes I do as it happens but I think Wiltshire Council has a duty to also protect its countryside as well.</p> <p>I feel the following observations should be considered</p> <p>I have been increasingly concerned at the way Trowbridge town centre has been going downhill, and at the increase in traffic on a road system that is just becoming totally inadequate for the existing population.</p> <p>Lack of employment for the increase in population. Trowbridge and surrounding area seem doomed to become nothing but a satellite area, housing but no soul or community.</p> <p>I also understand that there is to be another industrial estate in this area? Why? When there are empty buildings on White Horse Business Park. As already mentioned the Pavilion building has already been approved to be turned from commercial into residential. Plus there is a large industrial estate being built on greenfield sites opposite West Wilts Trading Estate</p> <p>There does not appear to be any plan for the development of road transport. By adding more housing, and another industrial estate, traffic will be increased considerably on all routes. This will all increase congestion at Yarnbrook ,at the Rising Sun roundabout and through North Bradley along the Southwick Road and on the narrow Wynsome Street through Southwick. The heavy weight of traffic, especially HGV lorries through, North Bradley and Southwick, has already made these roads extremely dangerous. Making turning in Malthouse Estate, Church Lane and the Rank almost impossible and during school times the road is nothing but lethal for children walking to school.</p> <p>The Trowbridge Community Area Strategy - part of the Wiltshire Core Strategy - describes lots of plans and proposals, but does not appear to say anything about infrastructure development apart from one secondary school, and there is no mention of developing the road network.</p> <p>At the consultation I asked if any of the land was already in the ownership of developers and was told that that information was not to hand. I am surprised that such large areas of land are being considered for development when there has been no attempt to consult owners of said land.</p> <p>While I understand that the need for additional houses is a, necessary, requirement from central government I feel Wiltshire Council has presented a very cobbled together list of proposed sites. No thought for villages, existing residents, infrastructure and especially protecting our greatly dwindling countryside and green areas. There has to be a way that suits everyone.</p>				
Attached files (Please see Objective)	4694108				
If your representation is seeking a change, do you					

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participate at the oral part
of the examination?**

Comment ID:	356	Consultee Mrs Cynthia Rennie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124532		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like evidence that all brown field sites have been considered before green fields are built on. Brown field sites should be considered first. A better road plan taking into account the excessive amount of traffic in this area. Do not attach development 298 to the village. North Bradley has been an independent village for hundreds of years. Allow it to remain as such.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	357	Consultee Mrs Cynthia Rennie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124532		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I think it is very important to maintain the identity of English villages and therefore object most strongly to 298 development attaching itself to North Bradley.</p> <p>Why has this development been pushed onto this side of Trowbridge</p> <p>Brown field sites should be considered first.</p> <p>A better road plan taking into account the excessive amount of traffic in this area.</p> <p>Do not attach development 298 to the village. North Bradley has been an independent village for hundreds of years. Allow it to remain as such.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	358	Consultee Mrs Cynthia Rennie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124532		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Has anyone tried travelling on the roads in this area. The roads are totally inadequate. We are living with a constant stream of lorries and at times it is very difficult to leave the village because of traffic from Yarnbrook and traffic travelling to the Spitfire Park trading centre. The roads are very overcrowded and totally inadequate.</p> <p>We are already suffering from an excessive amount of traffic surely you have a duty of care to the people who already live here.</p> <p>Brown field sites should be considered first.</p> <p>A better road plan taking into account the excessive amount of traffic in this area.</p> <p>Do not attach development 298 to the village. North Bradley has been an independent village for hundreds of years. Allow it to remain as such.</p>				
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If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	359	Consultee Mrs Cynthia Rennie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124532		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Where are the facilities for the people in these houses – Drs surgeries, schools etc. are new schools to be built Have you assessed whether existing schools can take more pupils. The DRs are already overloaded. Brown field sites should be considered first. A better road plan taking into account the excessive amount of traffic in this area. Do not attach development 298 to the village. North Bradley has been an independent village for hundreds of years. Allow it to remain as such.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	360	Consultee Peter and Gillian Sherry	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447691	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Consultation process			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Regarding the consultation process itself: It was noticeable that, despite the assistance of the staff present, it was not always easy to glean information as there was often only one copy of the most important documents, and often nigh impossible to find the relevant information on specific areas of concern when one finally got a chance to look at a document. A clear index and key were missing. As this was a public consultation it was obvious that members of the public would wish to read those documents pertaining to their area of concern. One copy of a complex document and multi area document was never going to satisfy that need. There being only one copy we had to wait over 45 minutes to view the document dealing in part with the Netherhampton Road proposed development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	361	Consultee Mrs Frances Augustin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124560	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		1 TRAFFIC The roads around here are used as a race track morning noon and night, putting the entrance to the new houses between 14 & 16 Woodmarsh would be extremely dangerous, taking the sharp corner 20yrds away into account. We cannot cross the roads now down by the Spitfire Retail Park, so this certainly wouldn't be any easier. Will the parking for the football field be sorted out before any houses are built, as Woodmarsh is currently used for parking making it very difficult to access our properties now. Where will heavy goods vehicles go. through the new houses or back down Woodmarsh .			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	362	Consultee Mrs Victoria Brown	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106487		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express concerns about and object to site 298 being included as part of the Wiltshire Council Housing Allocations. I do not believe the use of this site for development is a sound decision when referring to section 182 of the National Planning Policy Framework (NPPF), it is not justified or consistent with national planning policy. Specifically I do not consider the use of this site can be justified against sections 109, 110 and 111 of the NPPF.</p> <p>Building houses on this green field site does not seem like a sensible or logical option. There are numerous brown field sites around the town which are sitting unused and yet the Council deems it necessary to allocate green fields some of which have been in agricultural use for hundreds of years and have protected species living in them.</p> <p>What is extremely concerning is this this site is being considered when, due to constraints, it will only be able to contain 150 houses when an area of land this size can take 338 properties. The habitat will be destroyed so that the land can be used for houses at half the density other sites.</p> <p>It is accepted that some land does need to be used for residential development and that the NPPF needs to be considered in context as a whole document, not isolated sections. However, I do not consider the use of this site for development consistent with the NPPF, specifically Section 11: Conserving and enhancing the natural environment.</p> <p>The use of the site is not justified under policy 109 because a large area of land (big enough for 338 dwellings) with high ecological value, containing a significant amount of ecosystem services would be destroyed for the benefit of only 150 homes. There are other sites where housing at a more appropriate density can be installed without such a significant amount of damage to the biodiversity. The government is committed to halting the decline in biodiversity but the use of this site will destroy this valuable area which provides food and habitat for a complex ecosystem struggling to survive around the urban sprawl of Trowbridge.</p> <p>Policy 111 states that the planning system should encourage effective use of land by re-using land that has been previously developed (brownfield land). Trowbridge has a significant amount of brownfield sites available, many of which, such as the old Bowyers site, has been sitting empty for a number of years. There are also many empty shops and office buildings. Policy 111 indicates these sites should be used rather than building on greenfield sites like site 298.</p> <p>Remove site 298 from the housing allocations document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	363	Consultee Mrs Frances Augustin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124560	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wildlife In the last 3mths alone we have had a vast amount of wildlife in our gardens including rabbits, squirrels, hedgehogs, bats, deer, foxes and badgers, we also have owls, woodpeckers and buzzard. When the Whitehorse Bussiness Park was built the numbers of all the above dropped, if these plans go ahead I would imagine we will loose all that. As this was one reason for buying here that would personally be heartbreaking. This is called Woodmarsh for a reason, being very wet at times.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	364	Consultee Mrs Frances Augustin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124560		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3 INFRASTRUCTURE Basically there is none to support the number of people that would added to the Trowbridge area. Not enough school places, no decent 24hr hospital facilities, and nowhere for these people to work. However they will be able to have a coffee in the 30 plus outlets in town dressed in their charity shop clothes on their mobile phones because that is the basis of the county towns centre. Will the emergency servises be icreased for this area because they cant cope now. What about street cleaners for the increased rubbish and dog mess that will be on the roads.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	365	Consultee Mrs Janet Bayliss Person ID: 1123578	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The regular traffic congestions at Harnham Giratory, Downton road, Newbridge road, Coombe road and the A3084 Harnham/Netherhapmton road is already causing considerable traffic problems which need to be resolved before any further building developments take place. A further estimated 1000 vehicles using the A3084 on a daily basis is beyond imagination. There is further considerable build up of traffic congestion on Salisbury Race Days and on Tuesdays from the Livestock Market. Only very recently there has been a fatal pedestrian accident involving a vehicle carrying livestock. I have lived in Harnham since 1977 when the population was 8000. -Schools, roads, emergency services, community facilities etc remain the same. Schools are oversubscribed and running at full capacity. Secondary schools, apart from the boys Grammar school, are out of the area and difficult for travel/access. Non residents use side roads for car parking when working/shopping/travelling to and from the Railway Station causing havoc for buses and emergency services, particularly in Upper and Middle Streets, which are also used as a "rat run" when Netherhampton road is congested. In the past 40 years Harnham has grown from a village to an over extended suburb without any real change or improvements to the basic infrastructure. . The link road between Netherhampton and Churchfields was abandoned because of its harmful effect on the adjacent Water Meadows.</p> <p>A Relief road around Harnham needs to be considered before any further development takes place, Consideration needs to be given to a proposed new Secondary School as well as the proposed primary school. Facilities such as community spaces, a superstore on the west side of Salisbury, along with a doctor's surgery before the plans for the Lime Kiln site takes place.</p> <p>A cycle path from the proposed new development into Salisbury would be a necessity to alleviate some of the traffic. Further investigation is needed into the environmental effects on the flood plain. Flood defences have already been built in Harnham which are not perfect for keeping the river water at bay. The river still bursts its banks and has to go somewhere.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	366	Consultee Mrs Frances Augustin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124560	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>4 300 PLUS ---WHY Trowbridge has seen so many houses built in the last 10 yrs I strongly feel we do not need more. Why do they have to built around Trowbidge and on all greenbelts sites. Families are not as big as they were years ago. The goverment said only last months that more Europeans went home as apossed to the numbers that came into the country. In 30yrs time these properties will be abandoned slums.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	367	Consultee Mrs Frances Augustin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124560	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5 VILLAGE STATUS This village has 'sought after' status that everyone paid a village premium for, some of which were only weeks before all this was announced. We do not want to be a suburb of Trowbridge we have our own identity. I understand that the area behind us will be 'executive housing', who will pay those prices by an industrial site that has constant noise from air con units, general production noise and idiots driving. Will there be compensation available to those directly affected by housing at the bottom of their gardens.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	368	Consultee Mrs Frances Augustin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124560	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>6 SUMMARY</p> <p>If all this housing is necessary why not build a whole new village or town in an area that is not so intrusive on others. Maybe even take back Imber! I Do these figures for new houses include all the individule private builds that have taken place in the last year throughout Trowbridge.</p> <p>What is being propossed will enclose North Bradley on 3 sides.</p> <p>When the Whitehorse Bussiness Park was built we were told that no buildings would be put on the greenbelt.</p> <p>Home owners will have their property devalued while landowners sit back and laugh at us.</p> <p>Trowbridge does not have the facilities to cope with this many people or vehicles.</p> <p>Will these new houses be offered to the young working people of the both North Bradley and Southwick at a cheaper price.</p> <p>We are the county town and that is where we should be concentrating first, in the town, improving that so we can be proud of our town, its decent shops we need not more cinamas and resturaunts.</p> <p>I strongly believe this is a very bad idea for the whole area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	369	Consultee Mr KB Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1115782	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	On a personal note I am dismayed at the prospect of even more traffic along Silver Street Lane, the main route to the nearby Grove Primary School. The provision of speed humps in College Road has already resulted in a big increase in vehicles using the road, where in places the surface is in very poor condition. While I know highways are not the responsibility of the Planning Department I cannot understand why little used roads such as The Croft, Charlotte Street, Woodmarsh, etc. have been completely resurfaced in recent years while busier routes like Silver Street Lane have been allowed to deteriorate.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	370	Consultee Mrs Doreen Murray	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124562		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not fair or proportional</p> <p>Netherhampton Village has 60 dwellings so the proposal for 740 houses is totally out of proportion.</p> <p>Transport The 3094 plus the Harnham Gyrotory and the Wilton Wall lights are already operating at full capacity. A development of this size would cause traffic chaos in this, and surrounding areas.</p> <p>Flood potential the massive run off from a development of this size would cause serious flooding in this area. None of these issues have been addressed in this proposal.</p> <p>Unless the above issues (in particular the matter of local roads) are fully addressed this proposal should not go ahead.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	371	Consultee Clive Knight	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124567	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan, I am a resident of Church Lane Trowbridge and this site as well as the Upper Studley and Southwick Court have been identified as preferred sites within the allocation plan .</p> <p>My concerns are as follows.</p> <p>The Church Lane land slopes down to the Lambrok Stream it is an area prone to flooding even after short periods of rain, the flood water pools at the bottom of the land spilling over onto Lambrok Meadow which is part of Southwick Country Park.</p> <p>The flood water not only affects the land adjacent to the Lambrok but causes the water table to rise in Lambrok Meadow and for large areas of it to become unfit for people to walk on.</p> <p>Lambrok Meadow is further affected by flood waters lower down which pool in the area from the access footbridge at the Lambrok Close end, at times it is too deep for people to gain access to the park.</p> <p>Running through the Park is a drainage channel from the pond in the park it drains down to the Lambrok Stream below the footbridge.</p> <p>When the Lambrok Stream floods this causes water to back up in the channel finally overflowing onto the access paths, this has led to people being unable to use the paths and caused damage when the floods subside.</p> <p>In very wet weather the drains running through the Church Lane land are overwhelmed and there is a particular drain that is known for the geyser of water that comes out of it such as the volume of water that drains down to the area ..</p> <p>I enclose photos of the flooding I have noted on the Church Lane and Lambrok meadow land.</p> <p>The proposed development of Church Lane will seriously reduce the existing run off areas for rain water furthermore the proposed developments upstream on the Upper Studley and Southwick Court will further reduce the available land for run off.</p> <p>These proposed developments can only exacerbate the the problems leading to more sudden, greater and more prolonged flooding, this will seriously affect the Southwick Country Park which is an amenity enjoyed by many who travel quite some distance to visit, the Country Park is a highly regarded venue for its Saturday Park Run attracting 300+ regulars all who will be affected when the park experiences flooding.</p> <p>The gradual progression of global warming and climate change (which we have experienced in our life time) means the trend to warmer and wetter winters as well as wetter summers leading to ever increasing levels of rainfall and surely has to be a factor to be considered for these developments.</p>			
Attached files (Please see Objective)		4740748			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	372	Consultee Clive Knight	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124567		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan, I am a resident of Church Lane Trowbridge and this site as well as the Upper Studley and Southwick Court have been identified as preferred sites within the allocation plan .</p> <p>My concerns are as follows.</p> <p>Church Lane is one of the few remaining Greenfield site with rural views, over the years nature has taken over and it has become a hunting ground for Kestrels, Buzzards, Bats and Owls and offers a biodiversity harder to find now on the towns edge.</p> <p>The plan did note that the area is likely used by Bechstien,s bats with sensitive habitat features on/adjacent to the site.</p> <p>It also stated that provision of continuous corridors of native landscaping and favourable management (whatever that means as in our straightened times who monitors /pays for this) to allow long term protection of the bats, is this just a wordy way of getting round a problem which if the developments do affect the bats it will be too late and costly to do anything.</p> <p>This area will be lost and further flora and fauna will be affected both by urban development and with the increased flooding risk.</p> <p>By using the Lambrok Stream as a natural dividing line the council seem intent on Trowbridge sacrificing its greenfield spaces which no doubt are more profitable for developers leaving only the surrounding villages greenfield spaces as a rural buffer.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	373	Consultee Clive Knight	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124567		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan, I am a resident of Church Lane Trowbridge and this site as well as the Upper Studley and Southwick Court have been identified as preferred sites within the allocation plan.</p> <p>My concerns are as follows.</p> <p>The Trowbridge Traffic Model has concluded that the planned future development in Trowbridge resulting in the following.</p> <p>Reduced reliability for both motorist and bus passengers (given that public transport has no priority over cars).</p> <p>Increased journey times and journey distances</p> <p>Reduced traffic speed</p> <p>Increased traffic borne pollution</p> <p>Increased traffic volume and congestion will likely result in increased noise and visual intrusion and deter walking and cycling modes of travel. (Something the council thought the developments would encourage)</p> <p>It will reduce the economic, viability and attractiveness of Trowbridge as a place in which to live work or visit.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	374	Consultee Mr David Feather	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 402574	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Please accept this attachment as an objection to housing sites 263, 297, 298, 613, 1021, 3260 and 3565. A number of windfall schemes will shortly be coming to fruition on "brownfield sites" in Trowbridge. The ex- Bowyers site, ex East Wing site, Ex WWDC office site, St Georges Works site are ones I am aware of. I recommend that, because of this, and my submission above, sites 263, 297, 298, 613, 1021, 3260 and 3565 be withdrawn from the current DPD and be subject to re-consideration within a new Trowbridge Community Area Plan.				
Attached files (Please see Objective)	4694852				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	375	Consultee Simon Pritchard Clerk to West Tisbury Parish Council	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Tisbury Parish Council Person ID: 1121411		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.77			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Settlement Boundary Review 2017 Further to the Councils letter of 15th August 2017, I have been asked to write again to strongly emphasise the point below: Within E8 & F8 that all the gardens should be included and a rationalization of the line would be that it follows the line of large Conifer trees (E8). The line would join Monmouth Road at west end cottage but carry on down the road to the conifer trees and head off in a straight line until it gets to the gardens at the back of Mount Pleasant then turning at a right angle to join the current line. A site visit by some Members of the Council has now taken place and the area that the Council would like to see included are a mature garden + other gardens that are currently included. I have emailed 3 photos for your convenience.				
Attached files (Please see Objective)	4704616 / 4704617 / 4704618				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	376	Consultee Mrs Jennifer MacDougall Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Chilmark Parish Council Person ID: 390915		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	2.2 Settlement Hierarchy				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Chilmark wishes to confirm its status as a small village suitable only for infill.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	377	Consultee Mrs Anne Riddle	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1118211		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H3.3		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Insufficient public consultation Wider public consultation The plan puts forward two development sites in Harnham on opposite sides of Netherhampton Road but does not consider, or provide a clear opportunity for public comment on, their combined impact. This needs to take account not only of traffic congestion but of the increased risk of flooding, not only on the lower site, but further downstream in Harnham. H3.1 and H3.3 cannot be considered in isolation. H3.1 and H3.3 must be considered in terms of their combined impact. If site H3.1 is developed with 640, let alone 1,100 homes as the topic paper suggests, water will run off, not least onto site H3.3 which is already prone to flooding. The loss of natural drainage means that this surface water is first likely to collect on Netherhampton Road, worsening the traffic problems. Any loss of floodplain land such as H3.3 is likely to have an impact on homes further downstream in Harnham. My garden in St Mary's Road has flooded several times in the last 26 years, sometimes for weeks at a time. Indeed, a BBC news team has filmed the 'lake' that stretches from St Mary's Road to Queen Elizabeth Gardens in a bad year, as illustrated in the attached photo. Can the planners prove that development upstream will not increase the likelihood of such flooding occurring more frequently?</p>				
Attached files (Please see Objective)	4704653				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	No consideration appears to have been given to the points I have raised above.				

Comment ID:	378	Consultee Mr Ian Scaife	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 473545		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.75			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whiteparish Settlement Boundary</p> <p>The Whiteparish settlement boundary has not been updated to reflect the residential status of land to the rear and in the curtilage of 'The Banks, Common Road, Whiteparish' as approved by extant planning consent reference S/07/1416 dated 27 February 2008 (as attached);</p> <p>The planning consent S/07/1416 dated 27 February 2008 provides confirmation of the extent to which Salisbury District Council believed the curtilage of The Banks to be in residential use. With reference to the wording of the consent and its supporting schedules, notes and red and blue line boundaries, it confirms that the full extent of the SHLAA submission reference s181 (approximately 1.34 hectares) was in residential use for at least a ten year period up to 2008. This land is therefore overdue for inclusion in the Whiteparish settlement boundary.</p> <p>This being the case as stated in writing by the Council and as confirmed by recent legal advice, we respectfully request that the Council revise the Whiteparish Settlement boundary to reflect the full spatial extent of the decision (refer attached copy of S/07/1416 dated 27 February 2008). This is the most recent decision relating to this land and therefore supersedes any prior decision.</p> <p>The above referenced land is contiguous to the current Whiteparish village boundary. There is planning precedent set by a number of properties along Common Road further south of The Banks in the current Whiteparish Settlement boundary review for the inclusion of land subject to a planning application for continuing lawful use as residential land (previously agricultural land). Further details can be provided if needed.</p> <p>There is also some confusion on our part as to why the Whiteparish Church is shown as being within a revised settlement boundary. The citation relating to this amendment (coordinates H7 of the map) appears to reflect a misunderstanding of the nature of the site, its sensitivity and existing use as a Grade 1 listed church. Likewise it is unclear as to why the recently completed property 'Church Barn' adjacent to Whiteparish Surgery, The Banks and the Memorial Ground has been excluded.</p>				
Attached files (Please see Objective)	4704752				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	379	Consultee Mr Ian Scaife	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 473545		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.3 Indicative Requirements			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is no evidence available within the draft document and supporting information that provides a robust assessment of need in the South Wiltshire Community Area or indeed the settlement of Whiteparish itself.</p> <p>The draft allocation plan dismisses any need for land within the South Wiltshire CA showing residual housing requirement dropping drastically from the 2006-2026 requirements to 2014 and 2015, with no requirement beyond. The documentation does not provide details of the 78 dwelling developable commitments 2017-2026 and therefore does not allow analysis of the likelihood of the expressed housing numbers coming forward. Relying on windfall housing is not a reliable delivery method when there is clear housing need.</p> <p>The residual South Wiltshire CA requirements rely on strategic commitments in the South Wiltshire CA area which appear ambitious in yield and delivery timing. The Churchfields site in particular is subject to site constraints such as contamination and significant land fragmentation across over the 200 separate plots registered with the Land Registry.</p> <p>Strategic supply aside, the only evidence available referencing housing need in the village appears to come from Whiteparish Parish Council. While this group may be representative of the sentiment of the vocal minority in the village, they are not qualified to gauge the level of housing need. This is pertinent when considering the positive benefits that a supply of the right kind of housing can have on the viability of the village as a local service centre, but also allowing the community to continue and thrive.</p> <p>Whiteparish would benefit from the allocation of appropriate land for the right kind of housing development and it the responsibility of Wiltshire Council to ensure that this evidence base is robust. For example, further investigation would reveal that there is extremely limited potential remaining for infill development within the proposed Whiteparish village boundary.</p>				
Attached files (Please see Objective)	4704756				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	380	Consultee Mrs Anne Riddle	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1118211		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Insufficient public consultation Further and wider public consultation providing more detailed information It is not sensible to turn high-grade agricultural land into a country park merely as a sop to justify destroying other high-grade agricultural land by developing it for housing. If this site is not developed it will not be necessary to have a country park because what Harnham will have instead will be countryside.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Insufficient consideration has been given by the planners to the impact of this development, and there should have been meaningful public consultation with local residents before the site was selected.				

Comment ID:	381	Consultee Dr Ian Flindell Person ID: 861791	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.						
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Draft Wiltshire Housing Site Allocations Plan Formal Pre-Submission Consultation on the Draft Plan</p> <p>I wish to draw your attention to what appears to be an error on the plan of revised settlement boundaries in Winterslow (Figure A.76) of the consultation documents (see attachment 1). On your plan, the revised settlement boundary is drawn arbitrarily across the middle of SHLAA Site 3408, Beechwood, whereas we feel it should have been drawn around the perimeter of this site, as shown on attachment 1 where I have drawn in the site boundary using green cross hatching, and as shown on my original plan which was submitted in 2007 (see attachment 2).</p> <p>There are number of reasons to support this contention as follows;</p> <ol style="list-style-type: none"> 1. The current draft of the Winterslow Neighbourhood Plan (see attachment 3) recommends the whole of SHLAA Site 3408 for residential development, as Primary Site WNP01, on the basis of planning criteria identified on page 1 of the document, and according to comprehensive community consultation carried out by the Neighbourhood Plan Steering Group. 2. Development of this site would be sustainable, because Winterslow is identified as a Large Village within the Southern Wiltshire Community Area in the current adopted development plan - the Wiltshire Core Strategy (WCS) in Core Policies 1 and 24. The positive presumption in favour of sustainable development in plan-making is supported by National Planning Policy (NPPF Paragraphs 14 and 182) and by Core Policy 2 of the WCS in order to help meet the housing needs of settlements in Large Villages and to contribute to delivering the strategic housing requirements and objectives of the development plan (ensuring the delivery of housing land across the plan period in order to maintain a 5 year land supply at each HMA). 3. SHLAA Site 3408 is very well positioned on the eastern boundary of Middle Winterslow, yet it is very close to all village amenities such as the shop and post office, bus routes, pub, village school and recreation ground, and within 1km on hard surfaced pedestrian routes from the village hall and doctor's surgery. Road vehicles can access the site without passing through the village or going past the school and there would be no difficulty (in principle) in accessing main services from the road outside. 4. SHLAA Site 3408 as shown on the attached plans is fully compliant with the criteria set out in Table 2 of the consultation draft document (see attachment 4). The curtilage of the property at present is a large garden used for recreational and amenity space with outbuildings and established planting, particularly around the perimeter. SHLAA Site 3408 is on the western edge of the settlement, but nevertheless forms part of the built up area of the village. These are all reasons why the site was chosen by the Neighbourhood Plan Steering Group as Primary Site WNP01 and subsequently endorsed in comprehensive community consultation. 5. And finally, there are no landscape features or planning considerations which could be used to justify what appears to be an entirely arbitrary division across the middle of the site. <p>I would therefore be grateful if you would either correct this error in all future versions of this document, or alternatively, if there is some reason for what appears to be an arbitrary division across the middle of the site, then I would be grateful for an explanation.</p>				

Attached files (Please see Objective)	4704781
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	382	Consultee Dr Ian Flindell Person ID: 861791	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Draft Wiltshire Housing Site Allocations Plan Formal Pre-Submission Consultation on the Draft Plan</p> <p>I wish to draw your attention to what appears to be an error on the plan of revised settlement boundaries in Winterslow (Figure A.76) of the consultation documents (see attachment 1). On your plan, the revised settlement boundary is drawn arbitrarily across the middle of SHLAA Site 3408, Beechwood, whereas we feel it should have been drawn around the perimeter of this site, as shown on attachment 1 where I have drawn in the site boundary using green cross hatching, and as shown on my original plan which was submitted in 2007 (see attachment 2).</p> <p>There are number of reasons to support this contention as follows;</p> <ol style="list-style-type: none"> 1. The current draft of the Winterslow Neighbourhood Plan (see attachment 3) recommends the whole of SHLAA Site 3408 for residential development, as Primary Site WNP01, on the basis of planning criteria identified on page 1 of the document, and according to comprehensive community consultation carried out by the Neighbourhood Plan Steering Group. 2. Development of this site would be sustainable, because Winterslow is identified as a Large Village within the Southern Wiltshire Community Area in the current adopted development plan - the Wiltshire Core Strategy (WCS) in Core Policies 1 and 24. The positive presumption in favour of sustainable development in plan-making is supported by National Planning Policy (NPPF Paragraphs 14 and 182) and by Core Policy 2 of the WCS in order to help meet the housing needs of settlements in Large Villages and to contribute to delivering the strategic housing requirements and objectives of the development plan (ensuring the delivery of housing land across the plan period in order to maintain a 5 year land supply at each HMA). 3. SHLAA Site 3408 is very well positioned on the eastern boundary of Middle Winterslow, yet it is very close to all village amenities such as the shop and post office, bus routes, pub, village school and recreation ground, and within 1km on hard surfaced pedestrian routes from the village hall and doctor's surgery. Road vehicles can access the site without passing through the village or going past the school and there would be no difficulty (in principle) in accessing main services from the road outside. 4. SHLAA Site 3408 as shown on the attached plans is fully compliant with the criteria set out in Table 2 of the consultation draft document (see attachment 4). The curtilage of the property at present is a large garden used for recreational and amenity space with outbuildings and established planting, particularly around the perimeter. SHLAA Site 3408 is on the western edge of the settlement, but nevertheless forms part of the built up area of the village. These are all reasons why the site was chosen by the Neighbourhood Plan Steering Group as Primary Site WNP01 and subsequently endorsed in comprehensive community consultation. 5. And finally, there are no landscape features or planning considerations which could be used to justify what appears to be an entirely arbitrary division across the middle of the site. <p>I would therefore be grateful if you would either correct this error in all future versions of this document, or alternatively, if there is some reason for what appears to be an arbitrary division across the middle of the site, then I would be grateful for an explanation.</p>			

Attached files (Please see Objective)	4704781
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	383	Consultee Clive Knight	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124567	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan, I am a resident of Church Lane Trowbridge and this site as well as the Upper Studley and Southwick Court have been identified as preferred sites within the allocation plan .</p> <p>My concerns are as follows.</p> <p>This also seems to fly in the face of the National Planning Policy Framework</p> <p>Ensuring the vitality of town centres.</p> <p>The council appears to be not adopting a town centre first approach ignoring brown fields sites as these are not developer friendly although they could provide more affordable housing with an easier access to the town centre.</p> <p>Finally I do not believe that the proposed 45 developments for Church Lane and the other sites are not the final number, should permission be granted developer greed will take over with numbers increasing which can only add to flooding and traffic issues identified. I understand progress but this surely cannot be the future for Trowbridge sacrificed to meet a numbers total. .</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	384	Consultee Mr W Bollen	Agent Mr Dan Washington Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138423	BBA Architects and Planners Person ID: 1132859	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.42		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Site Allocation Plan –Pre-submission draft representationslandbetween206and208CorshamRoad,Whitley</p> <p>I write on behalf of our client, Mr W Bollen, to set out representations to the pre-submission Wiltshire Housing Site Allocations Plan in relation to land within his ownership between 206 and 208 Corsham Road, Whitley. This representation relates specifically to the proposed revised settlement boundary for Whitley.</p> <p>In undertaking the task of revising the settlement boundaries of the towns in Wiltshire, the Council has recognised that the existing settlement boundaries are out of date and do not reflect changes which have taken place since they were first established. The Council has acknowledged that houses and building along the eastern side Corsham Road form part of the settlement of Whitley and should be included in the settlement boundary. This includes Mr Bollen’s house at 208 Corsham Road and is supported. However, the proposed revision does not include all the land within Mr Bollen’s ownership. The land in question is shown in the attached aerial photo. It is a mown area of grass used as part of the garden to 208 Corsham Road for many years and clearly forms part of the village, as opposed to the open fields beyond. Its inclusion within the settlement boundary of Whitley would make logical sense as it would provide a consistent line with the rear of other properties already included with the revised HSAP boundary.</p> <p>The sites inclusion as proposed would be consistent with the settlement boundary review methodology as set out the relevant Topic Paper (Topic Paper 1) and would be consistent with the inclusion of other sites on the edge of Whitley.</p>				
Attached files (Please see Objective)	4748072				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	385	Consultee Mrs Linda Coombes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447590	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to strongly protest against the proposal to build 840 new houses in Harnham. There simply isn't the infrastructure to support such a plan. Anyone who has to use the Netherhampton/Harnham Road will already know that the volume of traffic is horrendous. The Harnham gyratory is a nightmare at all times of the day. Ambulances have difficulty getting through the traffic queues on their route to the hospital. Crossing the Harnham Road is almost impossible at times and extremely dangerous for old people and children. Indeed, there was a fatality only last week. I acknowledge the need for more housing, but please, let's think this through sensibly. Build the houses where the roads can cope with the huge amount of extra traffic which will be generated by 840 families travelling to and fro to work, school and the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	386	Consultee David Kemp	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124620	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council Site Allocations Plan – Ridgeway Farm, Crudwell</p> <p>I am concerned about the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell. The Plan notes that housing sites will only be allocated by the Council where there is a strategic priority. I understand from others that the Plan results in an oversupply of homes in the Malmesbury Community Area and therefore, within its' own terms, there is no strategic priority in Crudwell. The needs of Crudwell are a separate issue and I comment as follows.</p> <p>I readily acknowledge that the Site Allocation Plan proposal was developed without the benefit of a Crudwell Neighbourhood Plan. Crudwell residents will soon produce our Neighbourhood Plan and I would expect it to reflect issues such as schooling, flooding, road capacity and safety, and infrastructure. Our views have not yet been expressed and therefore references to further development in Crudwell should be deleted pending the publication of our Neighbourhood Plan.</p> <p>I am not anti-growth. Despite the fact we love our current almost idyllic location I raised no objection to the current modest development at Ridgeway Farm. The County and Country have needs that must be met. The issue now is that any decisions should not be made without the benefit of local expression, no matter how imperfect our efforts in delivering those expressions.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	393	Consultee Mrs Teresa Strange Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Melksham Without Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Community Area Topic Paper - MELKSHAM - Appendix : Proposals for revised settlement boundaries: A.1 Melksham and Bowerhill Village			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>H11, I11, I12, I13, J13, J12, K12, K13 Amend boundary to include area of built residential and community facility development physically related to the settlement.</p> <p>Melksham Without Parish Council queries the inconsistencies in the criteria applied to farm buildings and farmyards at the edge of large villages. The methodology document (Topic Paper 1 Settlement Boundary Review Methodology 8. Revised settlement boundary review methodology) states that these will be excluded*, and farms have been excluded in both the settlement boundaries for Shaw & Whitley and Melksham & Bowerhill in the parish, with the exception of Woolmore Farm. It is noted that Woolmore Farm is owned by Wiltshire Council and currently being marketed for sale with a local estate agent. It is therefore queried why this farm is the exception to Wiltshire Council's own methodology criteria.</p> <p>* The settlement boundaries define the built form of the settlement by, where practicable..... Areas which have been excluded are: Employment development, farm buildings and farmyards, at the edge of large villages.</p> <p>Your inclusion of Woolmore Farm in the settlement boundary for Bowerhill is not consistent with your own methodology, therefore Woolmore Farm should be removed from the proposed settlement boundary for Bowerhill to be consistent.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	394	Consultee Sharon Coombs	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124637	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5, 115 High Street, Littleton Pannell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With regard to a boundary review, including a plan showing the land to the rear of Nos. 109 and 115. We have proof that the garden to the rear of No. 115 was purchased by Winifred Still from her neighbour, Annie Jane Raine, in 1969 for £100. I attach a copy of the plan that was part of the conveyance of 1969, clearly showing the boundaries to No. 115. The original documents are readily available, should anyone wish to see them.</p>				
Attached files (Please see Objective)	4705286 / 4705287				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	395	Consultee Mrs Teresa Strange Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Melksham Without Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All settlement boundary maps			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Melksham Without Parish Council query the designation of land use within the Settlement Boundary which is not indicated on the new maps. This was previously colour coded on the West Wilts District Plan Settlement Boundary maps to identify employment land, amenity land and areas of green public open space, and the Council queries why this has not been given colour coded identification on the new maps. In the future how will these designations be preserved and recorded and easily accessible to all? For example, the new Oakfields Football and Rugby Club in Melksham Without - are these fields designated as Recreation Land?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	396	Consultee Mr Mark Ashley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122440	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>COMMENT ON THE PROPOSAL FOR REVISED SETTLEMENT BOUNDARY IN THE MARLBOROUGH COMMUNITY AREA</p> <p>I write to comment on the Proposals for Revised Settlement Boundaries as set out in the Map at Appendix A of the Marlborough Community Area Topic Paper dated June 2017.</p> <p>The paper states that the amended boundary is to include built residential development that is physically related to the settlement. I note that at B7 of the Map at Appendix A, the proposed revised settlement area does not accurately cover the current status quo as it fails to include the land associated with and within the curtilage of my home known as The Beeches, Downs Lane, Marlborough, Wiltshire SN84HS. I would ask that the proposed revised settlement boundary is amended to include all of my land in the same way it does for all of the neighbouring properties that surround my property.</p> <p>I attach a diagram outlining in black the curtilage of my property and hatching in black the missing land that I ask to be included in the revised settlement boundary.</p>				
Attached files (Please see Objective)	4705288				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	397	Consultee Mr Derek Archer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 900022		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Whole Plan		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by one quarter during the Plan period (and more after that) which exceeds the requirements for a five years supply.</p> <p>The Plan is not justified because WC have failed to explain how and when the jobs,schools,roads and other services and infrastructure will be provided to support this huge expansion.</p> <p>The Plan is not effective because WC's examination of "windfall", expected to provide 60% of new housing is grossly inadequate: one page in 4,500 pages of Plan documents.</p> <p>The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	398	Consultee Mrs Jane Lewis-Evans	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124760		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The road infrastructure is inadequate to support this development, and there is not enough detail in the Plan to explain how the road infrastructure would be sufficiently improved to accommodate the increased volume of traffic, given the lack of capacity at the junctions at either end of the A3094.</p> <p>The A3094 is heavily congested at times, with the consequential increase in air pollution during rush hour periods. The congestion coincides with school start and finish times, when there are high numbers of children and adult pedestrians walking along the Harnham and Netherhampton Roads breathing in the fumes. The pollution can only worsen.</p> <p>I did not support the previous plans for the Brunel Link/Harnham Relief Road several years ago, but for a development of this size, I do not see any viable alternative and think a version of the previous proposal needs to be considered prior to building a large scale housing development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	399	Consultee Mr Warren Wade	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 893748	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This objection email relates specifically to the land known as the 'Hilperton Gap' (Land west of Elizabeth Way) being included within the Housing Site Allocations Plan for housing development, covering the land in its entirety from the Elizabeth Way road through to Horse Road, Wyke Road and Victoria Road.</p> <p>We are writing to object and our comments are made below:</p> <p>The need to safeguard the countryside and the need to conserve trees and open land: The countryside surrounding Trowbridge, including Southwick are the last remaining green spaces to act as a buffer – without making Trowbridge one huge town encompassing many of our surrounding villages. During our 24 years living at Wyke Road in Trowbridge the surrounding area has changed enormously, unfortunately not always for the better. Countryside which ran from Staverton, Hilperton, the Wyke Road edge of Trowbridge through to West Ashton was open and unbuilt upon, over the last 20 years thousands of houses have now been built. We appreciate the need for Local Authorities to meet the Government's housing allocations for new builds, but surely there must come a point when the safeguarding of the last remaining countryside in an area which has seen extensive building must become of a higher importance than building a further housing development. The 'Hilperton gap' is greatly valued by local residents as a vital green lung for the North East of Trowbridge and the open space that preserves the two separate communities of Trowbridge town and Hilperton village. At a Trowbridge Town Council meeting which took place in 2015, which local residents attended, the Trowbridge Town Council's minuted conclusion was that the land known as 'the Hilperton Gap' should be safeguarded as a valued area of green space and should not be subject to building. I am sure the countryside surrounding Southwick is equally valued by local residents as much as the Hilperton Gap area is.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	400	Consultee Mr Warren Wade	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 893748	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This objection email relates specifically to the land known as the 'Hilperton Gap' (Land west of Elizabeth Way) being included within the Housing Site Allocations Plan for housing development, covering the land in its entirety from the Elizabeth Way road through to Horse Road, Wyke Road and Victoria Road.</p> <p>We are writing to object and our comments are made below:</p> <p>Flooding: The land known as 'the Hilperton Gap' floods. This winter has been drier than past winters, yet since the Hilperton relief road has opened the land known as 'the Hilperton Gap' has been far wetter and more marshy than we have ever known it previously. Gateways are totally underwater, the stream which runs through the land overflows regularly now and floods the land. The 'pond' area dug out when the road was built does not stop the land from flooding. Our concern is if this land is built upon, the old cottages and properties which were built over a hundred years ago, with no history of flooding, will then be subject to future flooding.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	401	Consultee Mr Warren Wade	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 893748		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This objection email relates specifically to the land known as the 'Hilperton Gap' (Land west of Elizabeth Way) being included within the Housing Site Allocations Plan for housing development, covering the land in its entirety from the Elizabeth Way road through to Horse Road, Wyke Road and Victoria Road.</p> <p>We are writing to object and our comments are made below:</p> <p>Highway safety and traffic: Traffic is an issue and the impact on local residents from these proposed developments will be huge. Noise disturbance and Effect of the level of privacy: If houses are built on the countryside to the rear of Wyke Road, the impact for local residents will be additional noise disturbance, light disturbance and local residents' privacy levels will be impacted upon enormously.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	402	Consultee Mr Warren Wade	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 893748		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This objection email relates specifically to the land known as the 'Hilperton Gap' (Land west of Elizabeth Way) being included within the Housing Site Allocations Plan for housing development, covering the land in its entirety from the Elizabeth Way road through to Horse Road, Wyke Road and Victoria Road.</p> <p>We are writing to object and our comments are made below: Footpath/cycle path: The proposed Footpath and cycle access to the properties will impact heavily on existing residents in Wyke Road and Victoria Road. This really is not acceptable. The developers are given no consideration to existing residents and the impact that this development will have of them.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	403	Consultee Mr Warren Wade	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 893748		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This objection email relates specifically to the land known as the 'Hilperton Gap' (Land west of Elizabeth Way) being included within the Housing Site Allocations Plan for housing development, covering the land in its entirety from the Elizabeth Way road through to Horse Road, Wyke Road and Victoria Road.</p> <p>We are writing to object and our comments are made below:</p> <p>Health & Wellbeing: For the health and wellbeing of communities, residents are encouraged to be active, have a healthy lifestyle and undertake regular exercise. The land known as 'the Hilperton Gap' is used by young and old alike for walking, running, playing football and cricket and it is a place for people to meet and socialise whilst walking and enjoying the countryside and local wildlife.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	404	Consultee Ms R Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122926	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing in opposition to the proposal to build houses on land adjacent to Southwick Court. Wildlife is already under threat and with the loss of more shrubs, trees and hedges, many of the latter having been there for decades and some of the trees being over a century old (such as the oak tree by the moat belonging to Southwick Court); this will surely have a knock on effect within the food chain and the eco system.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	405	Consultee Ms R Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122926	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing in opposition to the proposal to build houses on land adjacent to Southwick Court. The traffic along Silver Street Lane has over recent years increased, as the traffic along the adjoining Bradley and Frome Roads respectively, new houses on the proposed site therefore can only increase further the severity of this congestion. Heavy vehicles travelling along Silver Street Lane at present already send vibrations through some of their house walls causing them to shudder. An increase in this type of traffic would surely make matters worse.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	406	Consultee Ms R Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122926	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing in opposition to the proposal to build houses on land adjacent to Southwick Court.</p> <p>With the ever growing population it is without a doubt that more housing will be needed but why does it have to be on green fields?</p> <p>The use of fields to walk in is not only good exercise but offers a wide open space away from cars and fumes - a place to get away for a while from the often busy and stressful lives so many people live now. Not everyone owns a car or can afford to travel away from the built up areas which they inhabit. How enriching it is for many people to watch birds fly across the fields at low level.</p> <p>Wildlife is already under threat and with the loss of more shrubs, trees and hedges, many of the latter having been there for decades and some of the trees being over a century old (such as the oak tree by the moat belonging to Southwick Court); this will surely have a knock on effect within the food chain and the eco system</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	407	Consultee Mrs P E Clarkson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		298			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site 298 has always been considered a buffer strip from Trowbridge taking over the village. It supports much wildlife such as deer and bats.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	408	Consultee Rachel Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.48			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to clarify a matter that came up at the display yesterday at county hall, regarding planning and revised settlement boundaries. You are planning a revised boundary between Sandringham Road and Balmoral Road in Trowbridge. This boundary is running along the 3565 site. Please can you explain why, the answer given by your representative yesterday was inadequate and evasive, I as well as others thought so. It worries me that access to this site via one of these roads is planned. These roads were built as cul-de-sacs. My other concern is the boundary hedge which is protected by law. If you change the boundary as you intend then it will no longer form the boundary. So access can be obtained via your new boundary. If this is the case then I feel it is an abuse your power in a very underhanded way. So can you please explain why you deem it necessary to change the boundary at this location.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	409	Consultee Mrs Sarah Tucker CLERK TO THE COUNCIL	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		DURRINGTON TOWN COUNCIL		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Amesbury Topic Paper and associated main document relating to Durrington		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Durrington Town Council has submitted its formal response outlining the areas where it feels the Plan is unsound, specifically relating to Durrington. This response can be found in the attached documents listed as Durrington Town Council Response to Wiltshire Council Draft Housing Site Allocations Plan 2017.</p> <p>Following the publication of the Draft Housing Site Allocations Plan (the Plan), Durrington Town Council set up a Task Group to deliver its response about the Plan (specifically relating to Durrington) to Wiltshire Council. Throughout the 10 week consultation period the Task Group has discussed the Plan with Wiltshire Council Spatial Department representatives at the Consultation events, conducted its own survey within Durrington, conducted fact finding, reviewed the Plan and other Wiltshire Council documents and held a Public Meeting for its residents on the 17th of August. As a result of the Task Group's work, the Town Council sat an Extraordinary Meeting on the 12th of September to approve the following response in relation to the Plan.</p> <p>The Town Council believes that the Plan (specifically relating to Durrington) is unsound because it is not Positively Prepared, Justified or Effective based on the following evidence: [see following reps]</p> <p>Summary Durrington should be recognised by Wiltshire Council as the unique, self-contained and sustainable larger village that it is, not be grouped with Amesbury and Bulford as a Market Town. Whilst there is an understanding and a need for affordable homes in the local area there are serious concerns about these being located in Durrington. It is felt that the current infrastructure (roads, medical services, parking) could not sustain these additional homes. Further developing the village would increase the reliance on services outside of the village, threatening the sustainability of Durrington as a village, especially with the additional 440 homes as part of Army Re-basing. Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]</p>				
Attached files (Please see Objective)	4705468				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	410	Consultee Rachel Turner Person ID: 1120653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Site		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		H2.4 Church Lane Trowbridge	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.					

I am writing to air my concerns about the choice of site 1021 (Church Lane) at a site for the proposed development of at least 40 dwellings. Planning policy states that councils should maintain the setting of Heritage Sites. Whilst the Draft Housing sites Allocations Plan does acknowledge St Johns Church and Southwick Court, it fails to mention the other listed buildings that surround this site. The sites at the back of Church Lane provide a rural setting for 6 Grade II Listed buildings as follows: -

- St Johns Church School and Hall masters dwellings comprising 4 dwellings. (UID1021593)
- Church of St Johns (UID 1364192)
- 344 Frome Road (UID 1364193)
- Rose Villa (UID 1021594) .

National policy states that:

129 - Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

132 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. The photographs below clearly show that current development on this side of town has enabled these buildings to maintain their historic setting. In addition to the listed buildings at this site there is also an ancient water meadow:

MWI73S79 Water Meadow, West of Upper Studley

Summary

A post medieval water meadow is visible as earthworks on air photographs.

References

National Monuments Record, ST 85 NW 95

English Heritage Archives, 1577543

Grid reference ST 8403 5643 (map quarter sheet ST85NW)

	The site at Church lane should be maintained as open countryside to uphold the setting of these heritage buildings. Building in any of the current paddock would dramatically affect their setting, but also development of the larger field would impact on the open countryside that these buildings have shared for over 200 hundred years.
Attached files (Please see Objective)	4705621
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	411	Consultee Sue Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124853		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concern about the inclusion of farmland at Southwick Court in Wiltshire Council's Draft Housing Site Allocation Plan (HSAP) to fulfil the Government's target housing figures for Wiltshire.</p> <p>The HSAP reference for this farmland is 3565 (Land east of the A361 at Southwick Court).</p> <p>My concerns for site 3565 are:</p> <ol style="list-style-type: none"> 1. Southwick Court lies outside the boundary of the town of Trowbridge. The outer limit of the town at this point is along the hedgerow and water course known as Lambrok Stream which runs beside the properties and public footpath on Boundary Walk (hence the name). Including Southwick Court fields in the housing allocation land would require redrawing the town boundary and removing the green buffer between the villages of North Bradley & Southwick and the town of Trowbridge. Incorporating these villages into the town would remove their separate identity and community structure. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	412	Consultee Sue Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124853		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concern about the inclusion of farmland at Southwick Court in Wiltshire Council's Draft Housing Site Allocation Plan (HSAP) to fulfil the Government's target housing figures for Wiltshire. The HSAP reference for this farmland is 3565 (Land east of the A361 at Southwick Court). My concerns for site 3565 are: 2. The fields at Southwick Court are bounded by ancient hedgerows which form part of an historic parish boundary. There are maps dated 1890 (OS revision) and 1793 (Anderson & Drury) which show these ancient hedgerow boundaries. These hedgerows would be classed as "important" under the terms of the 1997 Hedgerow Act as they meet the relevant criteria set out in the Act, ie the hedge must have a variety of broad leafed plants and trees, must run alongside a bridleway or footpath, and must be associated with a pre-1600 building associated with land management (Southwick Court is Grade 2 listed and was built in the 1500s).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	413	Consultee Sue Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124853		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concern about the inclusion of farmland at Southwick Court in Wiltshire Council's Draft Housing Site Allocation Plan (HSAP) to fulfil the Government's target housing figures for Wiltshire. The HSAP reference for this farmland is 3565 (Land east of the A361 at Southwick Court).</p> <p>My concerns for site 3565 are: The proposed site at Southwick Court is subject to serious flooding. I understand that the inspection pits and test drillings recently carried out on this site show that the water table in these fields is less than one metre below the surface. It is also on a "clay belt" which makes surface drainage problematic. Having lived in this area for more than 40 years, I know that these fields flood on a regular basis after heavy rains, sometimes to a considerable depth. There has also been an issue with sewage waste from the drains crossing the fields in the local area where waste matter has backed up into gardens at the lower end of Sandringham Road</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	414	Consultee Sue Holt Person ID: 1124853	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concern about the inclusion of farmland at Southwick Court in Wiltshire Council's Draft Housing Site Allocation Plan (HSAP) to fulfil the Government's target housing figures for Wiltshire. The HSAP reference for this farmland is 3565 (Land east of the A361 at Southwick Court).</p> <p>My concerns for site 3565 are:</p> <p>4. The HSAP does not appear to have taken into consideration how a housing development on this site would be accessed. Any plans to access Southwick Court fields via one or more of the residential roads adjoining this site, ie Sandringham Road, Balmoral Road, Spring Meadows or Marston Road would have a severe environmental impact. These roads are not suited to the high volumes of vehicle movements that such a development would generate as, in the case of Sandringham Rd, Balmoral Road and Spring Meadows, these are narrow cul-de-sacs. Creating access roads through the "important" protected hedgerows would contravene the Hedgerows Act (see Point 2) and have a detrimental ecological effect by destroying the habitats of birds, bats and other wildlife that nest and feed in them.</p> <p>5. Entrance and egress at Southwick Court fields using the very busy A361 Frome Road would be dangerous because of impaired visibility. A similar argument would apply to the A363 North Bradley/Westbury Road. In addition, both the A361 and A363 are very heavily used by traffic entering and leaving the town, especially in the mornings, at the beginning and end of the school day (there are 3 senior schools, Trowbridge College, and 5 junior schools in the immediate area) and in the early evening. There are also considerable traffic movements on Bradley Road at other times of the day with vehicles going to and coming from the two Retail Parks situated there and the White Horse Business Park.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	415	Consultee Sue Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124853		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would also comment in general terms on the HSAP:</p> <p>a) There is a disproportionate allocation of housing to the town of Trowbridge when compared with other towns in North and West Wiltshire (section 4.44 of the Draft Housing Site Allocations Plan identifies the Housing Market areas and proposed levels of growth). Almost 7,000 new dwellings are proposed for the town in the indicative requirement for 2006-2026, compared with 4,510 for Chippenham, 2,240 for Melksham, and 1,920 for Warminster.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	416	Consultee Sue Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124853		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would also comment in general terms on the HSAP:</p> <p>b) Although Trowbridge is the County Town of Wiltshire, there has been a lack of infrastructure investment over many years, so it has limited industrial, business and commercial employment opportunities. A once vibrant shopping centre now has many empty retail premises and even the covered areas of Castle Place and the Shires have many unused shops. Building several thousand new homes in Trowbridge will simply make it a dormitory town for people working in places such as Bath, Bristol, Swindon and Chippenham, with the resultant negative environmental impact caused by substantial increases in traffic flow on the already narrow and congested roads in and around the town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	417	Consultee Sue Holt Person ID: 1124853	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would also comment in general terms on the HSAP:</p> <p>c) New regulations were proposed in April 2017 to encourage local authorities to speed up the development of derelict and under used land for new houses by creating Brownfield Registers. On 3rd April 2017 the government website quoted the Rt Hon Gavin Barwell, who was then the Housing and Planning Minister, as follows “The regulations implementing brownfield registers and permission in principle through brownfield registers have been laid in Parliament as part of secondary legislation relating to the Housing and Planning Act. They will come into force 21 days after being laid”.</p> <p>Wiltshire Council does not appear willing to take these requirements into consideration for the HSAP. Their response to questions submitted to Wiltshire Council’s Strategic Planning Committee by Cllr Ernie Clark, prior to their meeting on 13th September 2017, about the progress of the Town & Country Planning (Brownfield Land Register) Regulations 2017 and asking which sites are anticipated to be listed under Part 2 of the Register has brought the following response: “The Government did not release the data standards that they require Councils to use in the compilation of the Registers and the Planning Practice Guidance on its preparation until July 28th 2017”.</p> <p>Wiltshire Council’s response includes the statement that training would take place during August so that the Register can be compiled by the end of the year. It also states that “it is not envisaged that any (brownfield) sites will be listed in Part 2 of the Register in the first publication”.</p> <p>Therefore because no sites are envisaged for listing “the publication of the Brownfield Register will not require any changes to the draft Wiltshire Sites Housing Allocation Plan (sic)”.</p> <p>Please note: I have passed on the questions raised by Cllr Ernie Clark, and Wiltshire Council’s response, to the Rt Hon Alok Sharma, MP who has taken over from Gavin Barwell as the Government’s Housing & Planning Minister. I have requested clarification of the implementation of the Housing & Planning Act with specific reference to the Brownfield site register.</p> <p>d) In Trowbridge there are a number of Brownfield and Windfall sites which are all within the existing town boundary and could potentially yield building land for more than the number of houses proposed for three extremely controversial green field sites in the draft HSAP. These three green field sites are: Southwick Court fields (HSAP reference 3565), Land at the “Hilperton Gap” (HSAP reference 263/297); and the buffer land between the village of North Bradley and town of Trowbridge (HSAP reference 298).</p> <p>Brownfield/windfall sites which could - and should - be considered are the Bowyers factory, the West Wilts District Council offices at Bradley Road, the East Wing at County Hall, the Ashton Street Centre, the Virgin Media Pavilions on the White Horse Park, and Margaret Stancomb school/the area around Trowbridge Hospital. Most have been standing unused and/or derelict for many years, and are either Wiltshire Council owned or have been purchased by developers who have made no attempt to build on them, even though some sites already have at least outline planning approval. Less than half of the indicative requirement for housing in Trowbridge for the period 2006-2026 has been built to date which would seem to indicate a lack of interest in fulfilling this requirement on the part of developers [6,810 dwellings proposed, 2,625 built]. I would urge you to consider these issues when the draft HSAP is placed before the</p>				

	relevant committees and cabinet so that the three green field sites identified in section d) above are removed from the Plan and available brownfield sites within the town of Trowbridge are utilised. Removing the eyesores of derelict buildings and also areas which are cleared, but surrounded by high wooden fencing such as the Bowyers and West Wilts District Council office sites, would bring a dramatic improvement to the visual appearance of the town and maybe encourage outside investors to consider it for future business development purposes.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	418	Consultee Mr Peter Bryan Marlborough College	Agent Mr Andy Pearce Barton Willmore LLP	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138628	Person ID: 1103789	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.21-2.23		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Relationship to the Neighbourhood Plan: The plan should make express provision and acknowledge that local needs, including housing and social and community facilities, over and above the minimum requirements identified in the Core Strategy, should be identified through the Neighbourhood Plans and that such needs can be accommodated, where necessary through further release of land.</p> <p>See attached representation for further detail.</p> <p>The plan should make express provision and acknowledge that local needs, including housing and social and community facilities, over and above the minimum requirements identified in the Core Strategy, should be identified through the Neighbourhood Plans and that such needs can be accommodated, where necessary through further release of land.</p> <p>See attached representation for further detail, including the Marlborough Settlement Boundary Review Schedule.</p>				
Attached files (Please see Objective)	4751635				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our objections in part relate to the methodology applied to determine settlement boundaries. This needed to be explored and has not been justified by the evidence base. Further, the Council's assessment appears subjective and is not borne out by the detailed characteristics of the individual sites in question.				

Comment ID:	419	Consultee Mr & Mrs Trout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide : The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites. The councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	420	Consultee Mr & Mrs Trout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1122982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide : The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment.</p> <p>I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	421	Consultee Mr & Mrs Trout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows: Contradictions in the Strategy</p> <p>A core strategy or local plan is considered "sound" when it is consistent with national policy.</p> <p>Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide :</p> <p>The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment.</p> <p>I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p> <p>Accessibility from sites 1021</p> <p>The A361 is a blackspot for accidents both "in the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	422	Consultee Mr & Mrs Trout Person ID: 1122982	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide : The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites. Maintaining the local environment Sites 1021</p> <p>It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds. In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	423	Consultee Mr & Mrs Trout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1122982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy. A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide : The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment.</p> <p>I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p> <p>Maintaining the local environment Sites 1021</p> <p>It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	424	Consultee Mr & Mrs Trout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1122982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows: Contradictions in the Strategy</p> <p>A core strategy or local plan is considered "sound" when it is consistent with national policy.</p> <p>Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide :</p> <p>The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment.</p> <p>I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p> <p>Accessibility from sites 3620</p> <p>The A361 is a blackspot for accidents both "in the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	425	Consultee Dr John Land	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 899720	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Community Area Topic Paper-Devizes A.4 Rowde Site 3367		Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Rowde is identified in the Wiltshire Core Strategy (WCS) as a sustainable "Large Village" in Core Policy 1 Settlement Strategy, which has a very good range of community and businesses which is assessed as suitable for some sustainable growth. However, in the East Wiltshire HMA there has been a blanket approach to restrict new housing in the large villages which is loosely justified because of the strength and supply overall in the HMA. The proposed village settlement boundary has been drawn tightly around the existing built area and provides few opportunities for future development. Almost all infilling has been taken up within the previous decade(s) within Rowde and consequently the village has had a low level of housing completions and commitments since 2006 (estimated at about 8 -10 dwellings in total) and there are now few suitable and available housing sites for sustaining the Village up to 2026. In the absence of a Neighbourhood Plan Wiltshire Council are required to ensure that suitable housing sites are available.</p> <p>There is no evidence that any site survey analysis has been carried out by Wiltshire Council within Rowde and the sites rejected on the basis of the limited informal consultation with the Parish Council. The "Report on the Informal Consultation on the Approach to Large Villages January 2016" states that site ref 3367 has infrastructure drainage and flooding issues and highway constraints. This is attributed to the Rowde Parish Council but this is not verified and the comments/opinions are not substantiated. The landowner has not previously been given the opportunity to respond to these assertions despite a submission in the previous consultation round in 2015. The land is already raised above the flood zone and highway analysis and initial consultation with Wiltshire Council states that there are no technical impediment to development (supporting document attached). The site can accommodate 6-8 small dwellings which will assist in delivering local housing needs.</p> <p>Settlement boundary proposal should be adjusted to include land adjacent to the existing settlement boundary to allow some sustainable development within the plan period. To include site 3367</p>			
Attached files (Please see Objective)		4705942			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To provide detailed evidence on site suitability for development, to challenge unsubstantiated objections to the proposed inclusion of site 3367 and the unsoundness of the limited informal consultation undertaken.			

Comment ID:	426	Consultee Ms Catherine Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72,111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
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Comment ID:	427	Consultee Ms Catherine Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	428	Consultee Ms Catherine Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	429	Consultee Ms Catherine Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	430	Consultee Ms Catherine Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	431	Consultee Ms Catherine Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	432	Consultee Ms Catherine Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	433	Consultee Ms Catherine Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	434	Consultee Ms Catherine Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	435	Consultee Ms Catherine Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	436	Consultee Ms Catherine Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	437	Consultee Mr and Mrs Cutler Person ID: 1124912	Agent Mark Reynolds Person ID: 1124938	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other			Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[NB all Figures, Tables and Plans referred to within this representation can be found within the attached document]</p> <p>THE RELEVANT POLICY TO WHICH THIS REPRESENTATION RELATES</p> <p>1.1 This objection centres on the following parts of the document; 6. Settlement boundary review (and its supporting text) Table 6.2; Appendix A –Warminster Community Area, A.70 Sutton Veny proposals for revised settlement boundaries. Particular regard is focussed on Sutton Veny but the representation also questions the validity of the policy approach as a whole, in terms of its wording and construct.</p> <p>1.2 This representation is structured to firstly consider the rationale underpinning the requirement for the settlement review before considering the housing supply position within the North West Housing Market Area (NW HMA) and the Warminster Community Area (WMCA). It goes on then to consider my Client’s land in Sutton Veny and the case for its inclusion within the revised settlement boundary. An assessment of other development options within Sutton Veny is undertaken and thereafter the requested change to the WHSAP is outlined before concluding remarks are drawn.</p> <p>2 EVOLUTION OF THE REQUIREMENT FOR SETTLEMENT BOUNDARY REVIEW</p> <p>2.1 The Wiltshire Core Strategy, Inspector’s Report December 2014 noted (at paragraph 36) that ‘the Council has not reviewed the extent of the boundaries to inform the CS; instead relying upon the pre-existing development plan documents. Some of these were adopted several years ago, for example the Kennet Local Plan (2004), and it cannot be argued with great strength that the settlement boundaries contained therein are up to date for the purposes of the CS plan period’. 3</p> <p>2.2 The Inspector went on ‘to review boundaries, the CS identifies community led planning as the vehicle to deliver the necessary updates. However, there remains a considerable risk that, for example, Neighbourhood Plans will not be delivered across the county in a comprehensive or timely fashion. Such an outcome would, in the context of the CS settlement and delivery strategy, potentially preclude development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning’.</p> <p>2.3 The Inspector suggested main modification 5 to the Core Strategy noting that ‘there is scope to advance a timely review through a separate Development Plan Document’. At paragraph 41 the Inspector concluded that ‘CP2 therefore relies heavily on the existence of settlement boundaries to manage growth. Whilst the principle of such an approach may be justified in terms of providing plan led clarity to what development may go where, the efficacy of the plan is partially undermined by the absence of particularly robust evidence in support of the identified limits for each settlement...the effectiveness of CP2 in combination with CP1 is dependent upon a timely review of settlement limits as described in paragraph 37 above’.</p> <p>2.4 Topic Paper 3: Settlement Strategy (one of the topic papers which form the evidence base for the Core Strategy) advises (on page 45) ‘existing boundaries offer protection to the countryside and guard against urban sprawl ribbon development. However given that existing boundaries are out of date and do not reflect the current urban form there are development pressures along the boundaries’.</p>				

2.5 Paragraph 3.34 of the same document guides that at large villages 'the majority of development will take the form of small housing and employment sites within existing settlement boundaries, although some limited development may be appropriate adjacent to current settlement boundaries'.

2.6 Paragraph 3.40 goes on to note that in settlements where 'existing boundaries are to be retained they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or Neighbourhood Plan it is expected that the review would then provide for development beyond the current settlement and the new boundary would again form the limit of development'.

2.7 The current position then is that the settlement boundaries are out of date. In the case of the settlement boundaries in the former West Wiltshire area these were drafted in the early 2000s prior to the west Wiltshire District Plan 1st Alteration being adopted in 2004. The settlement boundary of the large village of Sutton Veny has not been reviewed in at least 15 years and as the CS Inspector highlights the settlement boundaries should be considered to be out of date. This fact was also accepted by the Council in CS Topic Paper 3: Settlement Strategy (pg. 45).

2.8 The speedy review, update and enlargement of settlement boundaries which the Inspector explicitly sought has not happened. It has been two and a half years since the CS was adopted and we have only just received a pre-submission draft plan for the Site Allocations DPD. In this case despite the acceptance in Topic Paper 3: Settlement Strategy that some growth should be allowed outside of the existing settlement the draft boundary for Sutton Veny does not facilitate this. The only areas of expansion encompass existing developed sites with no prospect of intensification.

2.9 Within Wiltshire progress on Neighbourhood Plans has also been limited. So far only 14 have been made and none have been made in 'large villages' which was one of the intended vehicles for further development to be brought forward. Sutton Veny Parish is not designated as a 'Neighbourhood Planning Area' so there is no prospect at present for the further development needs of the village to be met through Neighbourhood Planning.

2.10 The fears expressed by the CS Inspector have come to pass, to repeat, that there is 'considerable risk that, for example, Neighbourhood Plans will not be delivered across the county in a comprehensive or timely fashion. Such an outcome would, in the context of the CS settlement and delivery strategy, potentially preclude development initiatives on the basis of an unjustified evidence base'. The Site Allocations DPD is only in draft format but this threatens to further stifle growth in Sutton Veny and in the absence of a Neighbourhood Plan housing delivery will be frustrated.

4.3 The WHSAP attempts to deal with the housing shortfall and proposes allocations within Warminster totalling 200 dwellings and a further allocation in Chapmanslade of 35 dwellings. Even if one presumes that these allocations are deliverable the strategy is not planning for enough housing to meet the objectively assessed need (OAN). The settlement boundary review has followed a process designed to regularise existing areas of development which sit outside the boundary rather than to seek to support additional windfall developments at the large village.

5.2 The existing settlement boundaries have limited development opportunities within the large villages and this is borne out in the limited level of supply outlined above. It is then all the more critical that the review of the settlement boundaries be used to boost supply. The settlement boundary review has though been undertaken with the rationale being that the review should seek to update and accurately reflect circumstances on the ground since they were first established. In practical terms this has resulted in the large villages settlement boundaries being expanded to include some areas of the villages which should hitherto have been incorporated but also potentially developable areas have been removed as the boundaries have been tightened up in other places.

5.5 The CS Inspector was clear that the existing settlement boundaries were out of date and the CS was found sound on the basis that these would be swiftly updated. He noted that where 'existing boundaries are to be retained they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or Neighbourhood Plan it is expected that the review would then provide for development beyond the current settlement and the new boundary would again form the limit of development'.

7.3 Turning then to the revised boundary, it has been acknowledged by WC that the amendments have been made to regularise existing developments which sit outside of the settlement boundary rather than to identify new sites where windfall development may occur. An examination of the revised boundary very much confirms this as the approach. The only potential plot for development which I have been able to identify is a small parcel of land adjacent to No.5 Bests Lane which might accommodate one dwelling.

7.4 Other pieces of land of sufficient size to accommodate further residential development only include the grounds of the church of St John (on the High Street) or the grounds of The Manor House, Duck Street. However both of these are listed buildings and development within their grounds would result in substantial harm to the setting of these heritage assets and so would not be countenanced for development.

7.5 The conclusion of this exercise is that only one new dwelling could potentially be brought forward within Sutton Veny as a result of the settlement boundary review in its current form.

The revised settlement boundary for Sutton Veny should be expanded to include my Client's garden in full which is depicted at (Fig 1) and (Appendix 2). This will contribute to the plan in seeking to meet the as yet unmet housing need in the WMCA and achieving the 6 year housing land supply which the plan should be designed to deliver.

6.15 The land put forward here is located on the High Street relatively central to the core of the village with key facilities like the school and church directly opposite it. The proposed widened inclusion of land would not extend the form of the village which clearly extends further to the south east which has been recognised in that the settlement boundary has been extended significantly. The site is well screened with the existing treed boundary and the adjoining land to the south east is a field as can be seen on Figs 6, 7 and 8. There is no risk therefore that development might leap frog if the settlement boundary is widened.

6.16 It is important to have regard to the purpose of the settlement boundary review in considering whether my Client's land should be included in full. The CS Inspector noted that where 'existing boundaries are to be retained they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or Neighbourhood Plan it is expected that the review would then provide for development beyond the current settlement and the new boundary would again form the limit of development'. Indeed, the CS was only found sound on the basis that the settlement boundary review would be positively prepared. By including my Client's land this would allow for a small development to come forward to assist in meeting local housing need in Sutton Veny which to date has only delivered 2 dwellings during the CS period from 2006.

9 OVERALL CONCLUSIONS

9.1 The adoption of the CS was predicated upon a swift review of the 'out of date' settlement boundaries which was to be delivered through a separate DPD taking place quickly and the review of settlement boundaries was required to provide additional opportunities for residential development. Sutton Veny is not undertaking a NP so this is all the more important.

9.2 The WHSAP has been drafted on the basis of an estimated supply of 7,446 dwellings over the 5 years 2016-2021 within the NWHMA (Wiltshire Housing Land Supply Statement - March 2017). Subsequent planning appeals including most recently the development of up to 60 dwellings near Lyneham by Gleeson Developments Limited has reduced the agreed deliverable supply over this period to 6,891 dwellings. In this context the plan needs to be reconsidered to provide additional housing.

9.3 The latest position on housing land supply is that there is very limited flexibility within the NWHMA with a currently agreed supply of only 74 dwellings over the minimum housing level required. This fails to meet the WHSAP requirement for a 6 year supply to be deliverable.

9.4 Within the WMCA the housing land supply is particularly constrained. Even taking into account the proposed allocations through the WHSAP this still leaves a residual requirement for 259 dwellings to be identified just to meet the minimum requirement for the WMCA. The forecast rates of housing delivery likewise require a step change in supply with only 693 delivered in the first 11 years of the plan period and 1,367 completions required in the remaining 8 years which is a significant risk to delivery.

9.5 Against this backdrop of unmet housing need the settlement boundaries of the large villages have been reviewed to regularise existing areas of the settlements but no expansions have been identified to meet the minimum level of housing need. Sutton Veny has only delivered 2 dwelling in the CS period so far and is failing to meet identified need.

9.6 Under the auspices of the revised settlement boundary review methodology my Client's land as outlined in (Fig 1) and (Appendix 2) should be included in its entirety. The land is part of the residential garden of Prospect House and whilst the proposed amendment to the settlement boundary includes part of the land, recognising that it forms residential land physically related to the settlement, the same is true of the remainder of the garden so this should be included. This is particularly important because the revised methodology for settlement boundary review specifically excludes the prospect of subdividing gardens with the boundary which was strongly opposed during the informal consultation on the emerging methodology.

	<p>9.7 The revised methodology is clear that gardens should be included within the settlement boundary with the earlier iteration of the methodology, which sought to exclude large gardens, being removed from the revised methodology.</p> <p>9.8 Whilst not a policy requirement for garden land in large villages under the revised methodology it is clear that the inclusion of my Client's land will not extend the settlement which has been acknowledged in the revised methodology to extend the length of the High Street to the south east. The site likewise has a strong well treed boundary to the south east running the length of the site and this is the appropriate 'physical feature on the ground' to mark the edge of this part of the village.</p> <p>9.9 The existing methodology for settlement boundary review should thus include my Client's land. The housing shortage and lack of available supply to meet demand in Sutton Veny lend further significant weight to the land being included prior to examination of the WHSAP.</p>
<p>Attached files (Please see Objective)</p>	<p>4706096 / 4706126 / 4706127</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>In the event that the Council is unwilling to make the amendment sought through this representation it will be necessary to address the Inspector at the examination in public because the representation raises issues which question the soundness of the plan.</p>

Comment ID:	438	Consultee Mr and Mrs Cutler Person ID: 1124912	Agent Mark Reynolds Person ID: 1124938	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.57 SBR Sutton Veny			Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[NB all Figures, Tables and Plans referred to within this representation can be found within the attached document]</p> <p>6 MY CLIENT'S LAND IN SUTTON VENY AND THE CASE FOR ITS INCLUSION WITHIN THE SETTLEMENT BOUNDARY OF THE VILLAGE</p> <p>6.1 My Client's residential curtilage is shown in the below (Fig 1) and as a scaled drawing in (Appendix 2). The suggested amended settlement boundary is reproduced at (Fig 2) and the rationale for proposed amendments to the settlement boundary at (Fig 3). Fig 2 shows that a portion of my Client's curtilage has been included within the revised settlement boundary however the majority of the land has been excluded.</p> <p>6.2 The indicated rationale for the partial inclusion of the land is explained by referring to the corresponding grid reference note which is J8 which notes that the boundary has been amended to include residential development that is physically related to the settlement. This trend is repeated to the south west of the site with the inclusion of Springhead and Duck Street within the boundary.</p> <p>Fig 1 – Residential curtilage of Prospect House, Sutton Veny</p> <p>Fig 2 – Extract from indicative revised settlement boundary High Street, Sutton Veny</p> <p>Fig 3 – The rationale for amendments to the settlement boundary</p> <p>6.3 The revised settlement boundaries underpinning the WHSAP should reflect WC's methodology for reviewing the boundaries which is outlined in WHSAP Topic Paper 1. The boundary review methodology was put out for 'informal consultation' to the Parishes and the consultation feedback has been summarised at paragraph 6.5 of that document. One of the key conclusions was that respondents 'disagreed that the settlement boundary should exclude large gardens and particularly objected to the line being drawn through the middle of the curtilage of properties'. It was also 'argued that there was less opportunity to meet NPPF and Wiltshire Core Strategy housing targets on land within the settlement boundary because the proposed changes removed land with only minor additions. This resulted in tightly constrained settlements, excluding large gardens'.</p> <p>6.4 As a result of the 'informal consultation' exercise WC note at 7.20 of the Topic Paper that 'the revised settlement boundary review methodology will include the curtilage of a property that relates more closely to the built environment, e.g. a garden), or has limited capacity to extend the built form of the settlement in terms of scale and location'. The revised settlement boundary review methodology is thereafter produced at 8.2 of the Topic Paper and reproduced at (Fig 4) here for convenience.</p> <p>Fig 4 – Settlement boundary review methodology</p> <p>6.5 The qualifying criteria are clear that areas of garden should be included because these are uses which relate more closely to the built environment. The policy specifically allows for this and also allows for developments which have limited capacity to extend the built form of the settlement. The policy does not require a site to comply with both of these criteria because the policy wording uses the word or rather than and.</p> <p>6.6 The policy guards against large parcels of land coming forward by deliberately excluding areas which are more closely related to the open countryside (e.g. a field or paddock) from being included within the settlement boundary. It is important to highlight that there was a change between the draft methodology and the revised methodology regarding the definition of sites which should be excluded from the settlement</p>				

boundaries. At the draft methodology stage the plan sought to exclude 'the curtilage of properties that have the capacity to extend the built form of the development. This includes large gardens'.

6.7 The revised methodology removed any reference to garden land being excluded which was in response to the 'informal consultation' exercise. It now excludes those uses which relate more closely to the open countryside e.g. fields or paddocks. There can in this context be no question that the revised methodology excludes areas of garden from being located within the settlement boundary. As has been reported, WC accept that the splitting of curtilages with the settlement boundary should not occur in any case following strong consultee input to this effect.

6.8 The settlement boundary has, as referenced above, been extended to include a further portion of my Client's domestic garden but it has not though included the whole of the garden and therefore at present splits the curtilage. WC acknowledge that the positioning of the boundary is a desk top exercise and this would appear to be the reason for the misunderstanding in this case. Fig 5 is an extract from WC's mapping system which may help to explain this. On WC's mapping system the area of garden to the south east of the house is given a different colour and is annotated with trees. The practical situation on the ground is very different and aerial photography in (Fig 6) and (Fig 7) serve to illustrate this.

Fig 5 – Extract from Wiltshire Council mapping system

Fig 6 – Extract from BING maps (Birds eye view)

Fig 7 – Extract from BING maps (aerial view)

6.9 The aerial photography clearly shows the distinction between the well mown area of grass which comprises the garden of the property and the agricultural land beyond to the south west and south east. The edge of the curtilage at the south eastern end of the garden is marked by a strong linear row of trees which extend the length of the boundary and beyond. This is a strong physical marker which distinguishes the end of the residential garden land from the agricultural field beyond see (Fig 8).

Fig 8 – Photo of the boundary of the garden of Prospect House with the agricultural land beyond

6.10 The garden itself can be seen from the High Street only from the south eastern corner. Fig 9, Fig 10 and 11 are photos taken from within the site of the garden area which has been excluded from within the boundary. These photos clearly demonstrate the residential use and domestic appearance of the land, in common with the aerial imagery.

Fig 9 – View of the garden of Prospect House from the western boundary

Fig 10 – Photo from within the site showing ornamental planting and grassed lawn area.

Fig 11 – View back towards Prospect House from within the garden being put forward for inclusion within the settlement boundary

6.11 Fig 11 shows that the garden is not subdivided i.e. there is no logical barrier splitting the garden. It has always been and continues to be used as one garden space in this regard with free passage between each part of the garden.

6.12 The existing settlement boundary has been recognised by WC as splitting the residential garden of the property. As outlined above the justification for extending the settlement boundary in box J8 (which includes part of my Client's land) is given to include residential development that is physically well related to the village. The area of garden which we now seek inclusion within the settlement boundary should be included when adopting the 'revised methodology' which underpins the WHSAP because the guidance is explicit that the curtilage of property that relate more closely to the built environment (e.g. a garden) will be included. 23

6.13 The policy test does not require garden land to have limited potential to extend the built form of the settlement rather this test is applicable for land which relates more to the open countryside and in those cases a proposal would need to have the capacity to substantially extend the built form. In the case of my Client's land it would not extend the built form of the settlement. The land is in residential use already and there is a strong well treed boundary to the south east which would prevent development sprawling outside of the land already in residential use.

6.14 WC have accepted in producing this revised methodology that the settlement of Sutton Veny was not properly enclosed within the existing settlement boundary. This has resulted in the draft suggested settlement boundary being expanded significantly in a south easterly direction. My Client's land is directly opposite the village school and church which clearly form part of the heart of the village. These community assets have been included within the settlement boundary. Likewise the further ribbon development along the High Street to the south east and the cul de sac of Springhead and the residential development along Duck Street has been included. The revised settlement boundary in this regard better reflects the extent of the settlement.

6.15 The land put forward here is located on the High Street relatively central to the core of the village with key facilities like the school and church directly opposite it. The proposed widened inclusion of land would not extend the form of the village which clearly extends further to the south east which has been recognised in that the settlement boundary has been extended significantly. The site is well screened with the

existing treed boundary and the adjoining land to the south east is a field as can be seen on Figs 6, 7 and 8. There is no risk therefore that development might leap frog if the settlement boundary is widened.

6.16 It is important to have regard to the purpose of the settlement boundary review in considering whether my Client's land should be included in full. The CS Inspector noted that where 'existing boundaries are to be retained they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or Neighbourhood Plan it is expected that the review would then provide for development beyond the current settlement and the new boundary would again form the limit of development'. Indeed, the CS was only found sound on the basis that the settlement boundary review would be positively prepared. By including my Client's land this would allow for a small development to come forward to assist in meeting local housing need in Sutton Veny which to date has only delivered 2 dwellings during the CS period from 2006.

The revised settlement boundary for Sutton Veny should be expanded to include my Client's garden in full which is depicted at (Fig 1) and (Appendix 2). This will contribute to the plan in seeking to meet the as yet unmet housing need in the WMCA and achieving the 6 year housing land supply which the plan should be designed to deliver.

OVERALL CONCLUSIONS

9.1 The adoption of the CS was predicated upon a swift review of the 'out of date' settlement boundaries which was to be delivered through a separate DPD taking place quickly and the review of settlement boundaries was required to provide additional opportunities for residential development. Sutton Veny is not undertaking a NP so this is all the more important.

9.2 The WHSAP has been drafted on the basis of an estimated supply of 7,446 dwellings over the 5 years 2016-2021 within the NWHMA (Wiltshire Housing Land Supply Statement - March 2017). Subsequent planning appeals including most recently the development of up to 60 dwellings near Lyneham by Gleeson Developments Limited has reduced the agreed deliverable supply over this period to 6,891 dwellings. In this context the plan needs to be reconsidered to provide additional housing.

9.3 The latest position on housing land supply is that there is very limited flexibility within the NWHMA with a currently agreed supply of only 74 dwellings over the minimum housing level required. This fails to meet the WHSAP requirement for a 6 year supply to be deliverable.

9.4 Within the WMCA the housing land supply is particularly constrained. Even taking into account the proposed allocations through the WHSAP this still leaves a residual requirement for 259 dwellings to be identified just to meet the minimum requirement for the WMCA. The forecast rates of housing delivery likewise require a step change in supply with only 693 delivered in the first 11 years of the plan period and 1,367 completions required in the remaining 8 years which is a significant risk to delivery.

9.5 Against this backdrop of unmet housing need the settlement boundaries of the large villages have been reviewed to regularise existing areas of the settlements but no expansions have been identified to meet the minimum level of housing need. Sutton Veny has only delivered 2 dwelling in the CS period so far and is failing to meet identified need.

9.6 Under the auspices of the revised settlement boundary review methodology my Client's land as outlined in (Fig 1) and (Appendix 2) should be included in its entirety. The land is part of the residential garden of Prospect House and whilst the proposed amendment to the settlement boundary includes part of the land, recognising that it forms residential land physically related to the settlement, the same is true of the remainder of the garden so this should be included. This is particularly important because the revised methodology for settlement boundary review specifically excludes the prospect of subdividing gardens with the boundary which was strongly opposed during the informal consultation on the emerging methodology.

9.7 The revised methodology is clear that gardens should be included within the settlement boundary with the earlier iteration of the methodology, which sought to exclude large gardens, being removed from the revised methodology.

	<p>9.8 Whilst not a policy requirement for garden land in large villages under the revised methodology it is clear that the inclusion of my Client's land will not extend the settlement which has been acknowledged in the revised methodology to extend the length of the High Street to the south east. The site likewise has a strong well treed boundary to the south east running the length of the site and this is the appropriate 'physical feature on the ground' to mark the edge of this part of the village.</p> <p>9.9 The existing methodology for settlement boundary review should thus include my Client's land. The housing shortage and lack of available supply to meet demand in Sutton Veny lend further significant weight to the land being included prior to examination of the WHSAP.</p>
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other			Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Positively prepared Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[NB all Figures, Tables and Plans referred to within this representation can be found within the attached document]</p> <p>3 HOUSING SUPPLY IN THE NORTH AND WEST HOUSING MARKET AREA</p> <p>3.1 The Council on the 17th August 2017 received the Inspector's decision in respect of an appeal against a refusal of residential development of up to 60 dwellings near Lyneham by Gleeson Developments Limited (Appendix 1). The Inspector in reaching his decision considered the latest position in terms of the Council's ability to demonstrate a 5 year land supply in the North and West Housing Market Area (NW HMA). The Inspector concluded in the period 2016-2021 the minimum target is 6,817 dwellings (which includes a 5% buffer) and that the Council's supply would be 6,891 as opposed to the 7,033 which was alleged by the Council. The agreed supply figure for housing only marginally therefore exceeds the required level of housing by a projected 74 dwellings over the next 5 years.</p> <p>3.2 This calculation presumes also that the Council will continue to be required to demonstrate only a 5% buffer above the 5 year housing target. The Inspector in this appeal concluded that a 5% buffer was appropriate despite an earlier Inspector ruling in a Malmesbury appeal that persistent under-delivery had taken place. The Inspector did however sound a cautionary note in concluding 'overall whilst I acknowledge performance is not strong in housing delivery and there are worrying signs that the Council need to address, particularly in the more recent years since adoption of the WCS where delivery has not met requirements, I do not conclude that under delivery at this point has been persistent in the context of the framework'.</p> <p>3.3 The Government White Paper 'fixing the broken housing market' published a consultation response to a proposed Housing Delivery Test. This proposes an assessment of delivery against the housing requirement in the past 3 monitoring years, beginning in November 2017. In cases where delivery over this time period falls behind then a 20% buffer may be required. This measure is likely to increase the risk of Wiltshire Council having to apply a 20% buffer which would immediately in the NW HMA result in a lack of a five year land supply.</p> <p>3.4 The review of the need for site allocations and of the settlement boundaries which underpins the WHSAP was predicated on a very different understanding of the housing trajectory coming forward over the 5 year period 2016-21. Hitherto the Council identified a supply of 7,446 dwellings against a target of 6,817 dwellings. The Inspector in the Lyneham appeal referred to above concluded that the supply was actually 6,891 dwellings against a target of 6,817.</p> <p>3.5 Delivery rates have failed to meet the Council's expectations and in the months since the publication of the Land Supply Statement (March 2017) 555 dwellings have fallen away from the projected deliverable 5 year land supply. The published WHSAP has clearly been superseded by events and the appeal conclusions clearly indicate there is a need to increase supply within the NW HMA to avoid the risk of a lack of 5 year housing land supply occurring. The plan is un-sound in this regard because it is not positively prepared and it is not justified because it needs to be reviewed in terms of the material change in circumstances which the Lyneham appeal has yielded.</p> <p>3.6 The WHSAP recognises the uncertainties inherent in housing delivery. Paragraph 2.3 of Topic Paper 4: Developing Plan Proposals advises that WC's strategy is 'to be sure of maintaining a five year housing land supply over each of the remaining years of the plan period, annual</p>				

supply should exceed the five years and buffer required by planning policy. Any target level will be arbitrary but the Plan might look to provide at least six years of supply in each of the remaining years of the Plan period (to allow for any possibility of under-delivery in the future)'.
3.7 The 5 year housing land supply trajectory as published in the NW HMA purports to demonstrate that this is achievable in the HMA. This assessment is however based upon the now out of date projected deliverable supply. Whilst a delay in supply might bolster housing delivery at the end of the plan period, this becomes more uncertain when looking towards the end of the plan period. Based upon the Inspector's conclusions on housing land supply in the Lyneham appeal it is clear that WC will be unable to demonstrate a 6 year supply over the forthcoming 5 years (2017-22). The WHSAP therefore needs to be fundamentally looked at in respect of the NW HMA in order to boost supply if it is going to achieve its own stated goal of at least a 6 year supply being projected in each of the remaining Core Strategy years to 2026. Given the required step change in delivery rates and the recent under-delivery of housing it is argued that a 6 year supply is an entirely reasonable and necessary target.

4 HOUSING SUPPLY IN WARMINSTER AND ITS ASSOCIATED COMMUNITY AREA

4.1 The position is significantly worsened when looking at the housing position for Warminster and its associated community area. Evidence base Topic Paper 3 to the WHSAP table 2.2 reproduced below evidences the position;

4.2 The Council's evidence shows a residual requirement of 494 dwellings. This represents nearly 25% of the required supply needing to be found through the WHSAP by a combination of settlement boundary review and site allocations. Against this challenging housing target it is important to also recognise that at present only 693 completions have taken place in the first 11 years of the plan period averaging 63 completions per annum leaving 1,367 completions required over the last 9 years of the plan period at a delivery rate of 151 dwellings per annum. This requires a real step change in housing delivery in the area and any delays in bringing the West of Warminster housing allocation for 900 forward to be delivering housing from 2018 will make the situation much worse. This lack of contingency and reliance on one large site puts the already inadequate levels of housing being projected at risk of slippage.

4.3 The WHSAP attempts to deal with the housing shortfall and proposes allocations within Warminster totalling 200 dwellings and a further allocation in Chapmanslade of 35 dwellings. Even if one presumes that these allocations are deliverable the strategy is not planning for enough housing to meet the objectively assessed need (OAN). The settlement boundary review has followed a process designed to regularise existing areas of development which sit outside the boundary rather than to seek to support additional windfall developments at the large village.

4.4 The WHSAP recognises as did the CS that area based targets for housing need not be overly prescriptive indeed they should not be recognised as maximum levels of appropriate development. There are some instances of settlements and community areas which WC consider will not be capable of delivering their required levels of development. Core Policy 31 of the CS (paragraph 5.158) outlines the specific issues related to the WMCA but at paragraph 2.6 of the WMCA Topic Paper it is noted that 'neither the WCS or the IDP identify insurmountable issues to the extent that they would restrict delivery of the level of housing proposed over the plan period'. There is then no reason articulated by WC to explain development not meeting the target outlined in the WMCA. Whilst there will be an element of windfall development within the WMCA this alone will be insufficient to meet the residual requirement of 259 dwellings.

4.5 As outlined above at 3.6 and 3.7 the stated approach of the Council is to seek to deliver a 6 year supply of housing for each of the remaining years of the plan period. In the case of the WMCA this level of housing has not been planned for. Indeed it seems highly unlikely given the existing shortfalls within the WMCA that the required levels of housing are achievable. The plan is not in this regard sound because it has not been positively prepared and is failing to meet the objectively assessed need without any strong environmental reason for not doing so.

5 THE APPROACH TO LARGE VILLAGES WITHIN THE WMCA WITH A PARTICULAR FOCUS ON SUTTON VENY

5.1 The below table has been extracted from the WMCA Topic Paper. It illustrates that housing completions within the large villages in the WMCA have not been very high at 61 and this is particularly the case in respect of Sutton Veny where only 2 completions have been reported in a 10 year period.

Table 1 – Housing delivery in the large villages [table can be seen in the attached document]

5.2 The existing settlement boundaries have limited development opportunities within the large villages and this is borne out in the limited level of supply outlined above. It is then all the more critical that the review of the settlement boundaries be used to boost supply. The settlement boundary review has though been undertaken with the rationale being that the review should seek to update and accurately reflect circumstances on the ground since they were first established. In practical terms this has resulted in the large villages settlement boundaries

being expanded to include some areas of the villages which should hitherto have been incorporated but also potentially developable areas have been removed as the boundaries have been tightened up in other places.

5.3 The strategy for the WMCA is to make one allocation at Chapmanslade for 35 dwellings and stop growth in the other large villages, despite a shortfall in the WMCA and precarious housing land supply position more generally.

5.4 This approach to dealing with housing in the large villages fails the test of being consistent with national policy. The NPPG includes a section on rural housing and within this the Government make clear that 'rural housing is essential to ensure viable use of local facilities'. It goes on to note that 'all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence'. Sutton Veny is a larger village than Chapmanslade which is to receive an allocation of 35 dwellings and yet Sutton Veny is projected to deliver less than 10 dwellings.

5.5 The CS Inspector was clear that the existing settlement boundaries were out of date and the CS was found sound on the basis that these would be swiftly updated. He noted that where 'existing boundaries are to be retained they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or Neighbourhood Plan it is expected that the review would then provide for development beyond the current settlement and the new boundary would again form the limit of development'.

5.6 The evidence on housing need indicates a shortage of available housing and the CS Inspector clearly envisaged further growth outside of settlements. This is in line with the NPPF and NPPG which both seek thriving rural communities.

5.7 In order to begin to rectify these problems the settlement boundaries need to be reconsidered to allow for small scale increases through windfall developments allied to the larger site allocations process. At present WC's projected delivery is 143 dwellings in the remainder of WMCA (outside of Warminster) over the plan period this does not cater for the 6 years supply which is the stated objective of the plan, it likewise will not assist with meeting the housing shortfall in Warminster. The community area serving Warminster is the most logical area to search for further housing sites to meet this need and through settlement boundary reviews but the WHSAP fails to achieve this and is not therefore positively prepared.

5.8 The most recent evidence regarding housing need within Sutton Veny can be found in the November 2014 Sutton Veny Parish Housing Needs Survey. The survey was focussed on affordable housing need but it did also highlight the need for market housing. There were 111 respondents to the survey (32.5% of the village) and the key findings of the report were that 72% of respondents were in favour of some new housing in Sutton Veny. The most commonly option was for between 4-10 dwellings. In July 2014 there were 12 households on the WC Housing Register seeking affordable accommodation in Sutton Veny. Likewise those who were able to meet their own housing need on the open market also described a lack of suitable accommodation in Sutton Veny.

8 AMENDMENTS SOUGHT TO THE WHSAP

8.1 The revised settlement boundary for Sutton Veny should be expanded to include my Client's garden in full which is depicted at (Fig 1) and (Appendix 2). This will contribute to the plan in seeking to meet the as yet unmet housing need in the WMCA and achieving the 6 year housing land supply which the plan should be designed to deliver.

9 OVERALL CONCLUSIONS

9.1 The adoption of the CS was predicated upon a swift review of the 'out of date' settlement boundaries which was to be delivered through a separate DPD taking place quickly and the review of settlement boundaries was required to provide additional opportunities for residential development. Sutton Veny is not undertaking a NP so this is all the more important.

9.2 The WHSAP has been drafted on the basis of an estimated supply of 7,446 dwellings over the 5 years 2016-2021 within the NWHMA (Wiltshire Housing Land Supply Statement - March 2017). Subsequent planning appeals including most recently the development of up to 60 dwellings near Lyneham by Gleeson Developments Limited has reduced the agreed deliverable supply over this period to 6,891 dwellings. In this context the plan needs to be reconsidered to provide additional housing.

9.3 The latest position on housing land supply is that there is very limited flexibility within the NWHMA with a currently agreed supply of only 74 dwellings over the minimum housing level required. This fails to meet the WHSAP requirement for a 6 year supply to be deliverable.

	<p>9.4 Within the WMCA the housing land supply is particularly constrained. Even taking into account the proposed allocations through the WHSAP this still leaves a residual requirement for 259 dwellings to be identified just to meet the minimum requirement for the WMCA. The forecast rates of housing delivery likewise require a step change in supply with only 693 delivered in the first 11 years of the plan period and 1,367 completions required in the remaining 8 years which is a significant risk to delivery.</p> <p>9.5 Against this backdrop of unmet housing need the settlement boundaries of the large villages have been reviewed to regularise existing areas of the settlements but no expansions have been identified to meet the minimum level of housing need. Sutton Veny has only delivered 2 dwelling in the CS period so far and is failing to meet identified need.</p> <p>9.6 Under the auspices of the revised settlement boundary review methodology my Client's land as outlined in (Fig 1) and (Appendix 2) should be included in its entirety. The land is part of the residential garden of Prospect House and whilst the proposed amendment to the settlement boundary includes part of the land, recognising that it forms residential land physically related to the settlement, the same is true of the remainder of the garden so this should be included. This is particularly important because the revised methodology for settlement boundary review specifically excludes the prospect of subdividing gardens with the boundary which was strongly opposed during the informal consultation on the emerging methodology.</p> <p>9.7 The revised methodology is clear that gardens should be included within the settlement boundary with the earlier iteration of the methodology, which sought to exclude large gardens, being removed from the revised methodology.</p> <p>9.8 Whilst not a policy requirement for garden land in large villages under the revised methodology it is clear that the inclusion of my Client's land will not extend the settlement which has been acknowledged in the revised methodology to extend the length of the High Street to the south east. The site likewise has a strong well treed boundary to the south east running the length of the site and this is the appropriate 'physical feature on the ground' to mark the edge of this part of the village.</p> <p>9.9 The existing methodology for settlement boundary review should thus include my Client's land. The housing shortage and lack of available supply to meet demand in Sutton Veny lend further significant weight to the land being included prior to examination of the WHSAP.</p>
<p>Attached files (Please see Objective)</p>	<p>4706096 / 4706126 / 4706127</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>In the event that the Council are unwilling to make the amendment sought by this representation it will be necessary to address the Inspector at the examination in public because the representation raises issues which question the soundness of the plan.</p>

Comment ID:	440	Consultee Mr Philip Jones	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124908	Person ID:	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		all			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is a relief to see that the over development of Sutton Benger appears to have been recognised. I fully concur with the comments of that Parish Council and compliment you on the draft. However, I do not expect many of our Parishioners will waste as much time as it has taken me to register and find this form.</p> <p>Please make commenting easier if we are to feel valued. You may even get the odd compliment, if we can find the way here!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	441	Consultee D and G A'Bear	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124865	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Community Area Topic Paper-Chippenham Community Area: Yatton Keynell Revised Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Yatton Keynell is identified in the Wiltshire Core Strategy (WCS) as a sustainable "Large Village" in Core Policy 1 Settlement Strategy. The village has a very good range of community facilities and businesses. Yatton Keynell is assessed as suitable for some sustainable growth and at present does not have an advanced Neighbourhood Plan.</p> <p>It is proposed in the Settlement Boundary Review that the allocation of a single large site east of Farrells Farm will accommodate all the growth within Yatton Keynell for approximately 30 dwellings.</p> <p>The proposed Yatton Keynell village settlement boundary has elsewhere been drawn tightly around the existing built form and provides little opportunities for small scale future development. Almost all infilling has been taken up within the previous decade(s) within Yatton Keynell and there will be no small suitable and available housing sites within the Village up to 2026.</p> <p>The proposed development of one large site east of Farrells Farm will create a major visual impact at the beginning of the village and a reduction of landscape quality as well as a significant loss of countryside.</p> <p>A selection of smaller sites would be more in keeping with the village character and could be accommodated where they would have little adverse landscape impact.</p>			
Attached files (Please see Objective)		4706131			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	442	Consultee Mr Richard Price	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 932551	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.8			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Village boundary I am the owner of this property and wish to object strongly to the new proposed boundary which uses an old Georgian wall which runs across the middle of my garden as part the new boundary. I also own the 1 acre paddock on the other side of the road which is part of the property and is also within the current village boundary. I want to retain the current boundaries. May I speak urgently to you about the new proposal. I appreciate your help.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	443	Consultee Mr Mark Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 933063		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The former Bell Inn, at Appendix 3 grid squares G8 and F8, is a Grade II listed building. The extended western car park of this property has been included within the settlement as part of the proposed boundary change. If the proposed boundary change was to stand this would facilitate future unnecessary and unwanted housing development of the car park in proximity to a Grade II historical asset. This would be in opposition to the policies of Seend's emerging neighbourhood plan. Within that plan this land relates to, and facilitates, a designated significant view within a landscape gap from Seend to the open countryside to the south west of the Seend settlement. The Seend Parish Neighbourhood Plan Landscape Analysis Map shows the identified view in that landscape gap. Public consultation on the landscape element of the Seend neighbourhood plan has already taken place. Allowing the proposed change to stand will undermine the value of neighbourhood planning and create unnecessary boundary amendment work for both Wiltshire Council and the neighbourhood plan steering group.</p> <p>The extended area of the former Bell Inn car western park should be excluded from the proposed boundary change and the existing boundary line retained. Boundaries will remain subject to review and parishioner support within the ongoing process of the Seend neighbourhood plan. Local engagement from people who know the settlement supercedes the weak desktop methodology for determining the built environment of Seend. In the case of Seend, doing nothing in terms of boundary change will keep the site allocations plan compliant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	444	Consultee E and L Coombes	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448368		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to express my concern at the proposal to build 840 new homes in Harnham, Salisbury but particularly the development of 740 houses on both sides of the Netherhampton road.</p> <p>I fully recognise the need for more affordable housing for first time buyers, social and the more expensive properties so beloved of the builders/developers as well as the pressure on County and Local Councils to achieve Governmental house building targets. People need housing but any development must address the complex issues of infrastructure or else the impact on the quality of the lives of the current and established residents becomes even more unbearable.</p> <p>My family has lived in Harnham for 41 years and for the last 25 years actually on the Harnham road. We have experienced, first hand, the impact the upgrade of the 3094 to an 'A' road has made. We have witnessed the enormous increase in traffic, particularly the heavy lorry and van traffic, which effectively uses this road as a southern Salisbury bypass/'rat run'. Every week day morning we experience the traffic queues to the Harnham Gyratory which has been failing for many years now. We experience, at first hand, the difficulty of the emergency services (particularly ambulances) trying to navigate the queues and the increase in accidents.</p> <p>So my comment would be if you build the houses then build the appropriate infrastructure to cope with both the potential new and the existing traffic. I also strongly believe that if you have established plans then County Council Officials should be presenting these to residents of Harnham and Netherhampton at specific meetings so there are sensible and planned discussions.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	445	Consultee S R Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72,111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	446	Consultee S R Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	447	Consultee S R Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	448	Consultee S R Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	449	Consultee S R Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	450	Consultee S R Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	451	Consultee S R Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	452	Consultee S R Greenland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	453	Consultee S R Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	454	Consultee S R Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	455	Consultee S R Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124959	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	456	Consultee Fiona Johnson President	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Seend WI Person ID: 1124958		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In the case of the WI allotments, in Appendix 3 map grid H6, the well-used allotments are bounded on west, east and south sides by the built environment. To the north, half the boundary consists of an open field and the built environment to the east extends well north of that northern boundary. There is a sense that one is on land within the settlement and not on land more related to the open countryside. The boundary change methodology therefore does not stand scrutiny</p> <p>The Seend Lye Recreation Field (SLRF), now excluded from the Seend large village settlement by the proposed boundary change, has been part of the settlement since the 1960s. The SLRF is enclosed on three sides by the built environment of the settlement. The SLRF has constructed upon it a cricket pitch, 2 tennis courts, a children's play area, an equipment store and a concrete pad for cricket net practice. All of these features are said, by the methodology, to be "more related to the open countryside" than the settlement. This is patently not the case due to the very recreational nature and physical location of these facilities. Furthermore, when standing on the SLRF one has the sense of being in the settlement and not in the open countryside or anywhere related to the open countryside. The Seend WI considers that both recreational areas, the WI Allotments and the SLRF, must be retained as part of the Seend settlement, within the settlement boundary. The change necessary to achieve consistency and accuracy is to do nothing and leave the Seend settlement boundary unchanged but subject to review by the forthcoming Seend Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	457	Consultee Mr C Woodd	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446464	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Para 5.128 and Policy H3.1 say that this development would depend on sufficient improvements being made to the transport network serving the development. This presupposes that such improvements are possible. It is my view, from the position of someone living on Harnham Road, that until Wiltshire Council and the Highways Agency demonstrate that sufficient improvements can be made to make this scale of development viable, it cannot be said to be sound. The A3094 is already at capacity at peak times. Traffic is heavy throughout most weekdays. Adding up to 750 more households, perhaps 1500 additional cars, would provide an impossible burden. This would be exacerbated if a new school is built within this site, partly to absorb children from other parts of Salisbury, so further increasing the traffic load. There is already a major problem at the beginning and end of the school day with parents coming by car to the two Harnham Schools.</p> <p>These transport questions are important for four reasons:</p> <p>a) The economic cost and frustration caused by lengthy delays would be immense;</p> <p>b) There is a major danger to health from ambulances being delayed (this being a major route for ambulances between Odstock Hospital and Wilton/South Wilts). Delays have already been caused by the works on Harnham Bridge.</p> <p>c) The road is already very dangerous for cyclists. It would be essential for there to be separate provision for cyclists all the way from the roundabout at the end of New Harnham Road to the new development, if there were to be any chance of encouraging people to cycle rather than use their cars for local travel. (I realise there is some provision at each end, but this by itself is quite inadequate).</p> <p>d) However improved cycling provision must not be made at the expense of safety for pedestrians, as the footpaths are heavily used both by parents and children, and others. In fact there was a pedestrian fatality outside our house in Harnham Road just the other day. Given the width of the current road, and the position of the existing housing, I think the onus must be on the Council to show how the needs of drivers, cyclists, pedestrians and bus passengers could be met within the existing road structure before development on this scale on this site could be considered sound.</p> <p>In other words, I believe this plan is putting the cart before the horse. 'The robust and comprehensive transport assessment' that is proposed once development proposals are put forward is too late. The Council and the Highways Agency need to undertake such an assessment now, based on existing traffic loads, so as to put in place a more viable long-term transport strategy, before housing allocation sites of this scale are considered.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	458	Consultee Mr C Woodd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446464		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I also believe this site allocation is not justified, compared to the proposal already mooted for relocating the Churchfields industrial sites, and developing that area for housing. Such a development would provide housing near the city centre (and the Water Meadows), and particularly the station, thus much reducing car use in favour of cycling, walking and bus travel. Why is priority not being given to expediting that plan?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	459	Consultee Mr C Woodd	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446464	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Regarding H3.3, I believe the proposals underestimate the potential flood risk on this site (which is evident to passers by in the winter). If there is a major risk of flooding on the site, surely it is not a suitable site for development?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	460	Consultee Mr C Woodd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446464		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Para 5.128 and Policy H3.1 say that this development would depend on sufficient improvements being made to the transport network serving the development. This presupposes that such improvements are possible. It is my view, from the position of someone living on Harnham Road, that until Wiltshire Council and the Highways Agency demonstrate that sufficient improvements can be made to make this scale of development viable, it cannot be said to be sound. The A3094 is already at capacity at peak times. Traffic is heavy throughout most weekdays. Adding up to 750 more households, perhaps 1500 additional cars, would provide an impossible burden. This would be exacerbated if a new school is built within this site, partly to absorb children from other parts of Salisbury, so further increasing the traffic load. There is already a major problem at the beginning and end of the school day with parents coming by car to the two Harnham Schools.</p> <p>These transport questions are important for four reasons:</p> <p>a) The economic cost and frustration caused by lengthy delays would be immense;</p> <p>b) There is a major danger to health from ambulances being delayed (this being a major route for ambulances between Odstock Hospital and Wilton/South Wilts). Delays have already been caused by the works on Harnham Bridge.</p> <p>c) The road is already very dangerous for cyclists. It would be essential for there to be separate provision for cyclists all the way from the roundabout at the end of New Harnham Road to the new development, if there were to be any chance of encouraging people to cycle rather than use their cars for local travel. (I realise there is some provision at each end, but this by itself is quite inadequate).</p> <p>d) However improved cycling provision must not be made at the expense of safety for pedestrians, as the footpaths are heavily used both by parents and children, and others. In fact there was a pedestrian fatality outside our house in Harnham Road just the other day. Given the width of the current road, and the position of the existing housing, I think the onus must be on the Council to show how the needs of drivers, cyclists, pedestrians and bus passengers could be met within the existing road structure before development on this scale on this site could be considered sound.</p> <p>In other words, I believe this plan is putting the cart before the horse. 'The robust and comprehensive transport assessment' that is proposed once development proposals are put forward is too late. The Council and the Highways Agency need to undertake such an assessment now, based on existing traffic loads, so as to put in place a more viable long-term transport strategy, before housing allocation sites of this scale are considered.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	461	Consultee Mr Sam Gompels	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 400077		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I welcome the publication of the long-awaited Wiltshire Housing Site Allocation DPD and formal pre-submission consultation on the draft plan. This is a significant step in meeting the objectives set out in the Wiltshire Core Strategy and in the development of Wiltshire to 2026 and beyond. I note that Melksham has met its housing requirements as set out in the Wiltshire Core Strategy and hence no allocation is made within the DPD. However, as a sustainable Market Town within Wiltshire, on a main route through the county, I believe Melksham should still be considered for allocation within the plan. There is a need and desire for additional housing within Melksham as shown through the initial scoping consultation carried as part of the Neighbourhood Plan.</p> <p>It is also noted that there is a shortfall in the allocation at the Principle Settlement of Trowbridge in addition to severe question marks over the building out of the Core Strategy strategic allocation at Ashton Park, with it being highly unlikely to be completed before the end of the Core Strategy period. In light of this, quick wins within other nearby Market Towns in the North and West Housing Market Area should be considered in order to meet demand in the local area as well as the Core Strategy requirements for the HMA. This will ensure a good 5-year housing land supply, avoiding damaging speculative developments that are a consequence of not having a secure 5-year land supply.</p> <p>Melksham is on the main strategic A350 route through Wiltshire and does not have the constraints that Trowbridge is under, most notably the Bath and Bradford on Avon Bat SAC to the South and the West Wiltshire Green Belt to the North. Melksham does not have these constraints and is a highly sustainable location, currently welcoming significant investment, including the market place redevelopments and community campus project.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	462	Consultee Mr Sam Gompels	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 400077	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to promote SHLAA site 3331 for potential allocation of approximately 200 dwellings. It is anticipated that the site could be brought forward alongside site 3345 to the west. It is recognised that the site lies approximately 2km from the town centre however, it can no longer be considered to be located at an unsustainable distance. The site lies less than 300 meters to the east of the Melksham Oak School and the Hornchurch Road development opposite. It is therefore within reasonable walking distance of the school, as well as a less than 150 meters from the bus stop at Old Loves Farm serviced by the 271 Bath to Urchfont service, the SB2 Seend Shuttle to Melksham and the X72 service. Footpaths are already in place up to the site at Old Loves Farm and the development would facilitate further footways to the site to ensure a safe walking route to the centre of the town.</p> <p>Initial surveys and records indicate no archaeological interests within the vicinity of the site, nor does the site suffer from any ground or surface water flooding issues. There are no ecological constraints within or surrounding the site. Hedgerows form the boundary of the site and these can be retained and enhanced through the development. The site abuts the existing linear development on Carnation Lane to the east but a suitable landscape buffer has been allowed for in the indicative site layout plan. Old Loves Farmhouse is a grade II listed building on the northern boundary of site 3345 which is adjacent to site 3331. However, a landscape buffer and screening could be provided through site 3345 as well as on the north-western corner of site 3331. This would significantly reduce any adverse effects on the listed building.</p> <p>The site would form part of the western edge of Melksham and it is envisaged that the site could help facilitate the much-discussed Eastern Bypass that would greatly reduce the traffic pressures on the main routes including the A350 through Melksham and Beanacre. The site would fall inside of the new bypass which could pass from the A350 at the Littleton Roundabout around the site and on to the A350 North of Beanacre. It is noted a neighbourhood plan is in preparation in Melksham, but it is still at the very early scoping stage. It is felt that this site, with significant opportunities to facilitate the Eastern Bypass, would be much better delivered through allocation in the Wiltshire Housing Site Allocation DPD.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	463	Consultee Mr Steven Vaux Secretary	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Seend Lye Recreation Field Person ID: 1124971		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The desktop methodology for determining necessary boundary changes in Seend is understood but there are inconsistencies in application and an apparent lack of knowledge on actual land use. The Seend Lye Recreation Field (SLRF), now excluded from the Seend large village settlement by the proposed boundary change, has been part of the settlement since the 1960s. The SLRF is enclosed on three sides by the built environment of the settlement. The SLRF has constructed upon it a cricket pitch, 2 x tennis courts, a children's play area, an equipment store and a concrete pad for cricket net practice. All of these features are said, by the methodology, to be "more related to the open countryside" than the settlement. This is patently not the case due to the very recreational nature and physical location of these facilities. Furthermore, when standing on the SLRF one has the sense of being in the settlement and not in the open countryside or anywhere related to the open countryside. The Seend Lye Recreation Field charity insists that the SLRF be retained as part of the Seend settlement, within the settlement boundary.</p> <p>Similarly, in the case of the WI allotments, in Appendix 3 map grid H6, the well-used allotments are bounded on west, east and south sides by the built environment. To the north, about half the boundary abuts an open field and the built environment to the east extends well north of that northern boundary. Again, there is a sense that one is on land within the settlement and not on land more related to the open countryside. The change necessary to achieve consistency and accuracy is to do nothing and leave the Seend settlement boundary unchanged but subject to review by the forthcoming Seend Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	464	Consultee Mr Steven Vaux	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124979		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The former Bell Inn, at Appendix 3 grid squares G8 and F8, is a Grade II listed building. The extended western car park of this property has been included within the settlement as part of the proposed boundary change. If the proposed boundary change was to stand this would facilitate future unnecessary and unwanted housing development of the car park in proximity to a Grade II historical asset. This would be in opposition to the policies of Seend's emerging neighbourhood plan. Within that plan this land relates to, and facilitates, a designated significant view within a landscape gap from Seend to the open countryside to the south west of the Seend settlement. The Seend Parish Neighbourhood Plan Landscape Analysis Map shows the identified view in that landscape gap. Public consultation on the landscape element of the Seend neighbourhood plan has already taken place. Allowing the proposed change to stand will undermine the value of neighbourhood planning and create unnecessary boundary amendment work for both Wiltshire Council and the neighbourhood plan steering group.</p> <p>The extended area of the former Bell Inn car western park should be excluded from the proposed boundary change and the existing boundary line retained. Boundaries will remain subject to review and parishioner support within the ongoing process of the Seend neighbourhood plan. Local engagement from people who know the settlement supersedes the weak desktop methodology for determining the built environment of Seend. In the case of Seend, doing nothing in terms of boundary change will keep the site allocations plan compliant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	465	Consultee Mr Brian Crisp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124982		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The former Bell Inn, at Appendix 3 grid squares G8 and F8, is a Grade II listed building. The extended western car park of this property has been included within the settlement as part of the proposed boundary change. If the proposed boundary change was to stand this would facilitate future unnecessary and unwanted housing development of the car park in proximity to a Grade II historical asset. This would be in opposition to the policies of Seend's emerging neighbourhood plan. Within that plan this land relates to, and facilitates, a designated significant view within a landscape gap from Seend to the open countryside to the south west of the Seend settlement. The Seend Parish Neighbourhood Plan Landscape Analysis Map shows the identified view in that landscape gap. Public consultation on the landscape element of the Seend neighbourhood plan has already taken place. Allowing the proposed change to stand will undermine the value of neighbourhood planning and create unnecessary boundary amendment work for both Wiltshire Council and the neighbourhood plan steering group.</p> <p>The extended area of the former Bell Inn car western park should be excluded from the proposed boundary change and the existing boundary line retained. Boundaries will remain subject to review and parishioner support within the ongoing process of the Seend neighbourhood plan. Local engagement from people who know the settlement supersedes the weak desktop methodology for determining the built environment of Seend. In the case of Seend, doing nothing in terms of boundary change will keep the site allocations plan compliant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	466	Consultee Mr John Whalley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124984		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The former Bell Inn, at Appendix 3 grid squares G8 and F8, is a Grade II listed building. The extended western car park of this property has been included within the settlement as part of the proposed boundary change. If the proposed boundary change was to stand this would facilitate future unnecessary and unwanted housing development of the car park in proximity to a Grade II historical asset. This would be in opposition to the policies of Seend's emerging neighbourhood plan. Within that plan this land relates to, and facilitates, a designated significant view within a landscape gap from Seend to the open countryside to the south west of the Seend settlement. The Seend Parish Neighbourhood Plan Landscape Analysis Map shows the identified view in that landscape gap. Public consultation on the landscape element of the Seend neighbourhood plan has already taken place. Allowing the proposed change to stand will undermine the value of neighbourhood planning and create unnecessary boundary amendment work for both Wiltshire Council and the neighbourhood plan steering group.</p> <p>The extended area of the former Bell Inn car western park should be excluded from the proposed boundary change and the existing boundary line retained. Boundaries will remain subject to review and parishioner support within the ongoing process of the Seend neighbourhood plan. Local engagement from people who know the settlement supersedes the weak desktop methodology for determining the built environment of Seend. In the case of Seend, doing nothing in terms of boundary change will keep the site allocations plan compliant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	467	Consultee Mrs Yvette Rowe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124988		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The former Bell Inn, at Appendix 3 grid squares G8 and F8, is a Grade II listed building. The extended western car park of this property has been included within the settlement as part of the proposed boundary change. If the proposed boundary change was to stand this would facilitate future unnecessary and unwanted housing development of the car park in proximity to a Grade II historical asset. This would be in opposition to the policies of Seend's emerging neighbourhood plan. Within that plan this land relates to, and facilitates, a designated significant view within a landscape gap from Seend to the open countryside to the south west of the Seend settlement. The Seend Parish Neighbourhood Plan Landscape Analysis Map shows the identified view in that landscape gap. Public consultation on the landscape element of the Seend neighbourhood plan has already taken place. Allowing the proposed change to stand will undermine the value of neighbourhood planning and create unnecessary boundary amendment work for both Wiltshire Council and the neighbourhood plan steering group.</p> <p>The extended area of the former Bell Inn car western park should be excluded from the proposed boundary change and the existing boundary line retained. Boundaries will remain subject to review and parishioner support within the ongoing process of the Seend neighbourhood plan. Local engagement from people who know the settlement supersedes the weak desktop methodology for determining the built environment of Seend. In the case of Seend, doing nothing in terms of boundary change will keep the site allocations plan compliant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	468	Consultee Mrs Wendy Bull	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123964	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is difficult to know as I am not a planning lawyer.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is too difficult to comment on such a major scheme on line.				

Comment ID:	469	Consultee Geoff Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124995		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The land is subject to flooding. I have been a resident on the Home Farm estate for 40 years. On occasions I have seen water cascading down from the Southwick Court ponds and spreading across the fields to collect in large pools at the junction of the Home Farm winterbourne and the Lambrok stream. This is surely a potential danger to any houses built at this lowest part of the Southwick Court land.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	470	Consultee Geoff Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124995	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The land is beyond the Settlement Boundary of Trowbridge Town and extends the built area into Southwick Parish.</p> <p>The natural boundary of Trowbridge is the ancient boundary of the Home Farm hedgerow and winterbourne, with Southwick Court Estate.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	471	Consultee Geoff Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124995	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Access to the proposed site. As I understand the proposals, access to the Southwick Court land would be from the Home Farm estate. Spring Meadows, Sandringham Road, Balmoral Road and Marston Road were built as restricted access roads to their respective houses on the estate. These present cul-de-sacs are not suited to serve the additional traffic which would be generated by the proposed access to the much greater number of houses on the outlined Southwick Court side of the hedgerow and winterbourne.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	472	Consultee Geoff Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124995		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Bridges & Sewage Infrastructure. It would be necessary to construct bridges over the winterbourne and the Lambrok stream. These would impact upon the existing infrastructure and drainage of the Home Farm estate. You will be aware that there has in the past been considerable sewage flooding and damage affecting the houses Nos 22 & 24 Sandringham Road where the sewer runs under the gardens. This sewer runs to join the main pipeline alongside the Lambrok stream. No doubt Wessex Water will have the relative records.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	473	Consultee Geoff Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124995	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Local Schools and Colleges. Local roads are very congested particularly in morning and evening rush hours. In this area Clarendon Academy, John of Gaunt, St Augustines, and Wiltshire College, Trowbridge, have thousands of pupils drawn from a wide catchment area and already generate considerable pedestrian, coach, and motor traffic. There are also several infant and junior schools in the area and their pupils would be dangerously affected by any further increase in traffic consequent on building more houses in the area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	474	Consultee Geoff Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124995		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>General Traffic Infrastructure Trowbridge (the County Town) suffers from a general lack of access roads as all access into the town settlement has a single lane in each direction. Lorries and Coaches in particular have difficulty in negotiating roads into and through the town. This contrasts with Salisbury and Chippenham which have improving dual carriageway access. Building more and more houses in Trowbridge without a proportionate improvement in the external road system will lead to a reduction in the appeal of the Town as a Business hub and the ability of the town to progress as a viable sustainable community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	475	Consultee Mrs Wendy Bull	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123964		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am not a planning lawyer so I do not know. Building 100 houses on a known high flood risk area cannot be sound policy. I cannot see how this plan can be made sound.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	On line consultation is inadequate.				

Comment ID:	476	Consultee Miss Frances Howard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105345	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Harnham Neighbourhood Association met on 6th September at The Hall in Lower Street.</p> <p>175 people were present.</p> <p>1) They asked why WCC officer would not come to the local consultation meeting.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	477	Consultee Miss Frances Howard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105345	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Harnham Neighbourhood Association met on 6th September at The Hall in Lower Street. 175 people were present.</p> <p>2) They asked how the Britford water meadows development of 100 houses was turned down for traffic reasons but WH Atkins thought 1500 extra cars generated by 850 houses development could be considered.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	478	Consultee Miss Frances Howard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105345	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Harnham Neighbourhood Association met on 6th September at The Hall in Lower Street. 175 people were present.</p> <p>3) They asked why there were absolutely no details about infrastructure.</p> <p>4) They asked about the a primary school and also the need a for a secondary school in this site.</p> <p>6) They asked how unaffordable housing benefitted the local people on average wages.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	479	Consultee Miss Frances Howard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105345	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Harnham Neighbourhood Association met on 6th September at The Hall in Lower Street. 175 people were present.</p> <p>5) They raised concerns about outlying villages like Alderbury being cut off by the congested A36 and compared the question of inaccessibility to anywhere in Salisbury caused by this huge development, without a ring road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	480	Consultee R V Bolwell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125003	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This has now become a serious matter regarding the use of greenfield sites around Trowbridge. We have sat and watched the Paxcroft Mead estate expand to Ashton Road, now they want to plunder the Hilperton Gap. I have noticed all these are sites are prime Virgin land so easy to build on without the complications that a brown site could though up. I do think Trowbridge has provided its obligation to provide available land, is it because this land is easier to develop?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	481	Consultee Mrs Dawn Smethurst	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125004		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The former Bell Inn, at Appendix 3 grid squares G8 and F8, is a Grade II listed building. The extended western car park of this property has been included within the settlement as part of the proposed boundary change. If the proposed boundary change was to stand this would facilitate future unnecessary and unwanted housing development of the car park in proximity to a Grade II historical asset. This would be in opposition to the policies of Seend's emerging neighbourhood plan. Within that plan this land relates to, and facilitates, a designated significant view within a landscape gap from Seend to the open countryside to the south west of the Seend settlement. The Seend Parish Neighbourhood Plan Landscape Analysis Map shows the identified view in that landscape gap. Public consultation on the landscape element of the Seend neighbourhood plan has already taken place. Allowing the proposed change to stand will undermine the value of neighbourhood planning and create unnecessary boundary amendment work for both Wiltshire Council and the neighbourhood plan steering group.</p> <p>The extended area of the former Bell Inn car western park should be excluded from the proposed boundary change and the existing boundary line retained. Boundaries will remain subject to review and parishioner support within the ongoing process of the Seend neighbourhood plan. Local engagement from people who know the settlement supersedes the weak desktop methodology for determining the built environment of Seend. In the case of Seend, doing nothing in terms of boundary change will keep the site allocations plan compliant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	482	Consultee Ms Lucy Rouse	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124998		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I believe there is insufficient planning for the infrastructure needed to support an additional 740+ homes on Netherhampton Road in Salisbury. Traffic along Netherhampton Road and Harnham Road in particular will become even more of a problem than it already is. i also do not believe it is justified to build on farmland in the way that is proposed I suggest dropping the proposal to build 740+ homes on Netherhampton Road				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	483	Consultee Ms Lucy Rouse	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124998		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is insufficient infrastructure to support 740+ new homes on Netherhampton Road. Traffic on Netherhampton Road and Harnham Road will be considerably worsened by the addition of more housing. I also do not believe it is justified to build on farmland in the way that is proposed. I suggest dropping the proposal to build 740+ houses on Netherhampton Road from the Plan				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	484	Consultee mr kenneth ross	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123408		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposal to create 640 new dwellings on this site will undoubtedly lead to a huge increase in the number of vehicles using Netherhampton Road, the majority of which will travel east toward the Harnham Gyratory as the main hub for access to the city centre and other destinations beyond. At peak times the current road network cannot cope with the existing amount of traffic using it and long delays on all roads into the Harnham Gyratory are now the norm rather than the exception. This proposal can only make matters worse.</p> <p>Whilst there is mention of the Salisbury Transport Strategy being the solution to all the traffic problems associated with the proposed developments, the specific problems and solutions as to how they will be overcome are not mentioned. It is imperative that the traffic issues are fully addressed and solutions agreed in advance of development being approved.</p> <p>The concerns regarding traffic mentioned above also apply to H3.3, which will see 100 new dwellings to the north of Netherhampton Road and H3.4, which will see 100 new dwellings on Rowbarrow.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	485	Consultee Mr William Cousins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125007	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to object to the proposed development of 840 houses in Netherhampton Road due to traffic and access grounds. It is virtually impossible to get out of side roads onto Netherhampton Road safely whatever the time of day. This road is completely full and any traffic additions will be impossible.</p> <p>There are no buses or shops at this end of Netherhampton Road so everyone will have to drive.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	486	Consultee Mr William Cousins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125007	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	One of the sites chosen also regularly floods.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	487	Consultee Mr William Cousins	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125007		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is very difficult to get doctors appointments already and any new large amount of housing will mean ever longer waits. Salisbury hospital took 10 months to see a family member so new houses will mean less access to the hospital as well.</p> <p>There's not enough police to go round in salisbury so inviting more people in without addressing the needs of the poorer people of Salisbury</p> <p>There's not enough police to go round in salisbury so inviting more people in without addressing the needs of the poorer people of Salisbury</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	488	Consultee Mr William Cousins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125007	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There's also no work in the area so these people will be commuters.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	489	Consultee Mr William Cousins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125007	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I'm told these will be expensive houses for sale not to rent. Totally silly.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	490	Consultee B J Castle	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125019	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As the plans begin to be fine tuned for housing in my area may I make a plea for allotment provision to be included specific to this area. At present housing has been in the nature of house with very little garden. As a result I perceive that allotment provision by yourselves should be given heed to as it has been understood that allotments can be part of the gel that all communities benefit from. Our pursuit for housing must also be balanced with the human need to cultivate not only plants but respect and understanding between each other such as can be obtained when partaking in the running of an allotment area. See allotment benefits as held by the allotment association.</p> <p>I hope to become more involved in this as I find I am more able to – through age restrictions at work – as well as my desire to see greater involvement between the different bodies who are already concerned with the welfare of our community.</p> <p>With this in mind I have approached my parish council who can see no available land other than owned by Wiltshire County Council. The land in question at present being rented out to a local farmer – Mr T Rossiter – adjoining land that is occupied by the Grove Arms Pub (along A30). Suggesting that some party of this field, my desires and possibly ignorance of all facts showing here, may be used in this manner. I hope that all considerations are given to my request.</p> <p>I look forward to seeing this come to fruition in my time spent in this parish and included in the DPD plans of the area.</p>				
Attached files (Please see Objective)	4706469				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	491	Consultee Ms Heather Sheeley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1106218		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.2 H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The infrastructure of are around Netherhampton Road cannot support the number of houses and increase in population: schools over subscribed, road and traffic arrangement insufficient as route through city divert heavy and through traffic this way. South Wilts has taken a considerable burden on new houses without adequate support for population, Hospital, doctors, dentists, schools, work, buses and public transport, parking and welfare support.</p> <p>Sort out roads , increase employment, address school overcrowding, public transport and links to essential service. Improve road network to address through and local traffic.</p> <p>Loss of green space and productive Grade a farmland.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	492	Consultee Mr Stephen Wales Person ID: 1125050	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		site nos H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The development would increase traffic levels on Lower Road Quidhampton as people try to avoid traffic queues on Wilton Road and Netherhampton Road leading to the Wilton Wall lights. These can be quite severe. Lower Road has a 20mph speed restriction and traffic calming measures at the two ends of the village, it does not therefore have a high capacity.</p> <p>The Netherhampton Road has been acknowledged to be at its capacity in "The Salisbury Transport Strategy" and a significant increase in housing between the Wilton Wall Lights and Harnham is going to further increase demand on this road.</p> <p>Runoff will increase massively in the floodplains and valley catchment between Quidhampton and Netherhampton and Salisbury. This would increase flood levels and risks. There are low lying properties in Quidhampton that could be more significantly at risk according to the flood predictions from the Environment Agency.</p> <p>The proposed sites are greenfield sites.</p> <p>Not go ahead with proposed additional housing in Netherhampton.</p> <p>Review transport strategy for Salisbury</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	493	Consultee Mrs Nicki Pettis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125085	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.					
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	494	Consultee Mr Paul Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123429		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraph H3.5 and Figure 5.23 Clover Lane, Durrington		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan shown is inaccurate and incomplete, and consequently wholly misleading; no decision on planning can safely be made from it.</p> <p>The following comments relate solely to the Eastern part of Figure 5.23 (Clover Lane).</p> <p>Referring first to the 2 properties in the NE segment. The footprint of the Western most of these (the inverted L) is inaccurately shown; it is out of date and does not show an extension built in 2002. Furthermore the mature and established garden of this property extends to the West, through the black line into what appears to be, but is not, a separate paddock. The small building at the South-Centre of the garden is the garage belonging to the property. The whole garden area is enclosed by mature hedging. Thus the existing settlement already includes this area to the West of the black line and, therefore, the proposed settlement boundary should definitely be amended so that it too includes the garden.</p> <p>The plan shown is also incomplete because it does not show the Conservation Area which the proposed housing allocation would conjoin. The Conservation Area follows the existing settlement area described above (ie to the West of the proposed settlement boundary shown). If this Conservation Area was marked on the plan it could clearly be seen that any housing allocation in the area to the East of the hatched area would dominate and overwhelm the Conservation Area; it would negate any purpose of retaining the space as a Conservation Area. I believe that approval for the Conservation Area to be annulled must be given before this housing allocation can be approved. For that reason I have marked this plan as being legally non-compliant.</p> <p>To remove totally from the Proposed Housing Allocation the whole area to the East of the hatched area. Because Figure 5.23 is inaccurate and incomplete, and consequently wholly misleading; no decision on planning can safely be made from it. To remove totally from the Proposed Housing Allocation the whole area to the East of the hatched area.</p>				
Attached files (Please see Objective)	4706475				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	495	Consultee Mr Richard Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 899851		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There has been no attempt to formulate a cohesive transport strategy that measures the impact of the proposed developments on Park Wall junction, on Netherhampton Road, in particular the Harnham Gyratory and in turn the inner relief road.</p> <p>There are no measures that demonstrate the economic benefits that the proposed housing will bring to the communities of Netherhampton and Harnham and to Salisbury as a whole.</p> <p>No flood prevention measures are proposed.</p> <p>An effective transport strategy needs to be demonstrated and evidence that the housing provided will be in the reach of those who need it.</p> <p>I have grave concerns as to the impact that the north of Netherhampton Road development will have upon the flooding already experienced on this land (noting a few years ago a proposal for a link road to Churchfields was to required to built on stilts to prevent flooding).</p> <p>In addition the impact of the developments upon the skyline and thus the views of the Cathedral (the prime reason why people visit Salisbury) being further diminished.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	496	Consultee Mrs Sarah Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125173		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraph H3.5 Clover Lane, Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Because the impact that the Proposed housing allocation has on the Conservation Area that it would join up with. Do not proceed with the area to the East of the hatched area.</p> <p>In addition to the fundamental objection about the housing allocation East of the hatched area which would ruin the Conservation Area and make it meaningless, I feel very strongly that Wiltshire Council should disallow the whole of the housing allocation in Figure 5.23. Durrington is a rural village, albeit now a large one. It has grown from being a cluster of farms and agricultural dwellings into a kilometre square of architecturally impoverished development. The area to which Figure 5.23 relates is the very last pasture in the village. All the other green spaces in Durrington are now gardens or residential areas; this is the only area where livestock are still able to graze; it provides the last vestige of a rural scene. It would be wholly wrong to destroy the final link to its agricultural heritage by building yet more houses on the edge of this already uncharacteristically over-populated village. Let common sense prevail and the last few green fields in the village be preserved. Do not approve this housing allocation at Clover lane, Durrington.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	497	Consultee mrs cilla cunningham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125224		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		site nos H3.1 and H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed sites for 640 houses and 100 houses along Netherhampton Road will change the character of our village of Netherhampton and potentially turn it into a "suburb" of Salisbury, the scale of the development is inappropriate for this site. The Harnham Gyratory and Wilton Wall Lights junctions are already working to near capacity and the significant increase in traffic has not been addressed in any detail so I cannot see how this allocation can proceed without further information. Drainage is also a major concern. The drainage infrastructure is already substandard and the additional run off from such a major development is concerning.</p> <p>The impact of this development (completely out of proportion with its surroundings) needs significantly more thought.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I think the Council should give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan</p>				

Comment ID:	498	Consultee Mr Michael Roberts	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1105805		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Objective 3 Spatial Strategy North and West Wiltshire Housing Market Area		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Plan appears to be rigidly structured to exclude areas where targets are considered achieved thereby weighting development into those remaining. Trowbridge is deemed to require 700 dwellings and green field sites adjacent to existing settlement boundary seem to be target of choice.</p> <p>Paragraph 4.48 states: "Indicative levels of housing for Market Towns are not a ceiling and variations would not seem to present new or significant issues for local infrastructure and environmental capacity".</p> <p>I consider the Wiltshire Housing Site Allocations Plan to be unsound because it fails to consider the North and West Housing Market as a whole and is biased towards expanding Trowbridge and Salisbury.</p> <p>In my Representation 135 dated 16/08/17, Proposal H2.6 - Site 3565 Land East of the A361 at Southwick Court, I stated " there are also too many natural and man-made obstacles that require mitigation or holistic planning to make this an obvious planning choice. There must be other suitable sites within the County that would not exhibit such encumbrances and would therefore be more acceptable to help meet the Council's housing quota".</p> <p>Mr. S. Gompels' Representation 462 dated 29/08/17 seeks to promote SHLAA site 3331 in Melksham. This site appears capable of sustaining a greater number of dwellings and require few, if any, mitigation measures.</p> <p>Site 3331 should replace 3565 in the Draft Wiltshire Housing Site Allocations Plan because it is more sustainable and should be worthy of consideration as supported by Objective 3 Spatial Strategy North and West Wiltshire Housing Market Paragraph 4.48</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	499	Consultee Mrs Suzanne Beaven Person ID: 1125220	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Bratton 321 Court Orchard/Cassways			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I would like to add my comments to the Wiltshire Housing Site Allocation plan, specifically with regards to SHLAA Reference 321 – Bratton, Court Orchard/Cassways which has been identified to provide 40 dwellings. The Sustainability Appraisal Report PSCONS09N states that the site provides capacity for 32 residential units but I would like to point out that the site in question has had numerous planning applications refused for less than the amount currently proposed. W/92/00217/FUL was submitted for construction of 23 dwellings and was refused. W/93/00507/FUL was submitted for construction of 23 dwellings and was refused. W/78/01201/HIS was submitted for construction of a farmhouse and was refused. W/74/00979/HIS was submitted for six houses to the north of the current proposed development site and was refused. I believe that Bratton would not be able to support nor requires the amount of housing proposed and that the infrastructure, transport and amenities do not support the Site Allocation Plan. Housing needs to be placed in an appropriate location with good transport links and job opportunities. The current draft proposal for Bratton 321 Court Orchard/Cassways largely relies on dwelling residents having access to private vehicles. The area to the south east of Trowbridge along West Ashton Road is currently registered for up to 2,500 dwellings, employment, two local centres, two schools, public open space and associated highway works.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	500	Consultee Dr Gary Henry Person ID: 1125248	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site 3260 – Land at Upper Studley			Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is in relation to Site 3260 – Land at Upper Studley only.</p> <p>Points raised are quoted directly from: WHSA PSCONS09K Wiltshire Housing Site Allocations Plan SA Rpt Annex 1 - A.9. _ Trowbridge CAR June 2017 supplemented by my comments in italics: Impact on Wildlife The stream corridor, Poplar trees and hedgerows are likely to support commuting/foraging bat species such as Greater Horsehoe ... records indicate the presence of Greater Horsehoe and other bat species which use the Country Park and Lambrok Stream as foraging and roosting habitat. Development of the site for housing would inevitably lead to a loss of greenfield land I can add that we have discovered grass snakes and frogs and there is at least one nesting owl amongst the poplar trees. The proposed number of dwellings at site 3260 will have to be reduced, as noted by the report. So there is very little to gain and much to lose in the construction of property on this site. Inclusion of this site plan is neither justified (too small, not cost effective) or effective (more detrimental to natural surroundings, expensive to mitigate against risk of flooding) and puts pressure on local services and transport system.</p>				
Attached files (Please see Objective)	4706480				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	501	Consultee Mrs Julie Norman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 730331	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.45			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed town boundary appears to have arbitrarily cut off the corner of our garden land. Our garden boundary joins Chelworth Road at 90 degrees and does not follow the edge of the new tarmac driveway. Please ensure that this garden land is preserved in its original designation. This is the reason our barn was built in its current position - to avoid the use of garden land.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	502	Consultee Ms Caroline Toomey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125255		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5. Housing Site Allocataions H2 14, Figure 5.18			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The development of the proposed site for 40 houses would have an adverse effect on the conservation area of the parish, impacting the views from higher ground and the White Horse Consider multiple alternative sites away from the B3098, particularly where infill is possible Reduce the allocation of houses The increased volume of traffic on the B3098 resulting from the large volume of houses concentrated in such a small area will mean more delays, more accidents, a greater volume of traffic through and round the village and an increased need for ongoing repairs to the already worn road surface. People who live on the main road already endure a constant stream of traffic through the day, with the accompanying noise and pollution. This will be made worse by the increased number of houses.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	503	Consultee Mrs Cathryn Hanny	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125262		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.50			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am a resident of Woodmarsh, North Bradley and see from these new revised proposed boundary that if this is approved my address will actually be Trowbridge and I will no longer be a part of North Bradley. Myself and others in my street have paid a premium on our houses for a village location, how can you propose to remove the village location from our address just because we live on the side of the road which you wish to develop with a housing estate - this no doubt is the reason behind the proposed change to boundary! This will have a dramatic effect on our house price and the feel of being part of a village community. I am appalled that this can be done and had I not have looked would not have known about. My reasons for opposing this are those I have noted above. I do not believe it to be right that one side of a street can be classed as 'North Bradley' and the other side not! Therefore one side of Woodmarsh would be in a village location and the other side in Trowbridge.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	504	Consultee Mr Simon Hunt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1117600		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 1021 Church Lane		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Paragraph 5.68 mentions retaining the setting of the Grade II listed church but fails to mention the other Grade II listed buildings which are adjacent to the Church Lane site. Their setting will also need to be considered.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	505	Consultee MR David BULLOCK	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125261		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.57		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No clear explanation why no further housing allocations are assigned to Westbury, adopting a position of 'consolidating growth'. This is not based on any assessment of need for housing in Westbury or reflection of investment in community services and provision of excellent transport links - thereby ideally suited to further growth.</p> <p>Housing for the Westbury area should not be allocated to the small or large village locations as allocations for Bratton should be removed and allocated to Westbury, where adequate land, opportunities, facilities and transport links are easily obtainable.</p> <p>The case to exclude housing from Westbury is not made with any assessment of housing need, employment opportunities, facilities and transport links. The conclusion that Westbury should be consolidated is based only on an assessment of having had an increase in housing and therefore other areas should be looked at. This does not reflect need and is unsubstantiated.</p> <p>The WCS should include growth at Westbury and plan to include a level of housing growth based on demand reflecting the facilities, services, employment and transport links provided/</p> <p>No justification for consolidating housing for Westbury - not based on demand, facilities or employment afforded in this community area. Instead growth is pushed to small/large village location (Bratton) where there is no investment in such facilities exist.</p> <p>Inclusion of housing allocation for Westbury, removal of allocation for small/large village Bratton</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	506	Consultee MR David BULLOCK	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125261		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.57		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No clear explanation why no further housing allocations are assigned to Westbury, adopting a position of 'consolidating growth'. This is not based on any assessment of need for housing in Westbury or reflection of investment in community services and provision of excellent transport links - thereby ideally suited to further growth.</p> <p>Housing for the Westbury area should not be allocated to the small or large village locations as allocations for Bratton should be removed and allocated to Westbury, where adequate land, opportunities, facilities and transport links are easily obtainable.</p> <p>The case to exclude housing from Westbury is not made with any assessment of housing need, employment opportunities, facilities and transport links. The conclusion that Westbury should be consolidated is based only on an assessment of having had an increase in housing and therefore other areas should be looked at. This does not reflect need and is unsubstantiated.</p> <p>The WCS should include growth at Westbury and plan to include a level of housing growth based on demand reflecting the facilities, services, employment and transport links provided/</p> <p>No justification for consolidating housing for Westbury - not based on demand, facilities or employment afforded in this community area. Instead growth is pushed to small/large village location (Bratton) where there is no investment in such facilities exist.</p> <p>Inclusion of housing allocation for Westbury, removal of allocation for small/large village Bratton</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	507	Consultee Mrs Cathryn Hanny	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125262		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The houses on Woodmarsh would bought for a premium as they are in a prime village location within North Bradley, before this proposal was made. How will these people be compensated when they can no longer sell their houses for the price they were bought? Especially as not only are they at risk of losing their village status, they will also have a housing estate at the bottom of their gardens!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	508	Consultee Mrs Cathryn Hanny	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125262		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Why does North Bradley have to take the brunt of the housing need in this area? The roads are already dangerous, busy and very fast (as shown in figures produced by the council) we have been promised lots of solutions but nothing has ever been done, who will help when even more cars are using the roads, especially Woodmarsh and Westbury road? What reassurances will we be given that traffic calming will be put in? This is a village where crossing the road is already dangerous and at times frightening especially for children and the elderly residents. We do not have the road structure to support these new houses - nor should we have to! This proposal means people will lose money on their properties as they will no longer be in a village and be left living on an even busier road than they already do, without any offers of help.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	509	Consultee Mrs Harriet McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125265		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos H3.1 and H3.3		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>NOT FAIR OR PROPORTIONATE</p> <ul style="list-style-type: none"> • There is no “nimbyism” behind our objection. The constructive manner in which all residents of Netherhampton have engaged in the discussion with the Wilton Estate regarding the planning application for development at Netherhampton Farm demonstrates that there is acceptance of the need for new housing provided that its scale is in keeping with the existing settlement and can be sustained by the local infrastructure. Netherhampton has approximately 60 dwellings and this new development at Netherhampton Farm will increase that number by over 30%. This feels like a fair share of the overall commitment facing South Wilshire and Wiltshire generally. • The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury. • The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council's estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary? • The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”				

Comment ID:	510	Consultee Mr Benjamin McGuire	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125268	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I support the views set out in the response given by my parish council which are reproduced below and entirely reflect my views: Netherhampton residents oppose the plans for the following reasons</p> <p>NOT FAIR OR PROPORTIONATE There is no “nimbyism” behind our objection. The constructive manner in which all residents of Netherhampton have engaged in the discussion with the Wilton Estate regarding the planning application for development at Netherhampton Farm demonstrates that there is acceptance of the need for new housing provided that its scale is in keeping with the existing settlement and can be sustained by the local infrastructure. Netherhampton has approximately 60 dwellings and this new development at Netherhampton Farm will increase that number by over 30%. This feels like a fair share of the overall commitment facing South Wilshire and Wiltshire generally. The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury. The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary? The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	511	Consultee Mr Benjamin McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125268		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <p>The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”.</p> <p>Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	512	Consultee MR David BULLOCK	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125261	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.115 to 5.121		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Large Villages = Development limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities. There is no justifiable need for this development in Bratton, it contravenes policy by adding a burden on existing services and facilities, provides no contribution to the community. Removal of the allocation of housing for plot shown Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	513	Consultee mrs elizabeth gouldson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125317		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.58		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>1. The Plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by one quarter during the Plan period (and more after that) which exceeds the requirement for a five year supply.</p> <p>2. The Plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion.</p> <p>3. The Plan is not effective because WC's examination of 'windfall', which is expected to provide 60% of new housing, is grossly inadequate – comprising one page out of 4,500 pages of the Plan documents.</p> <p>4. The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes Look to build on brown field sites within the town boundaries.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	514	Consultee Mr Bryan Simmons	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125357		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Crossways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I should like to concur with Mr Owen's comments: the access onlt being to the Westbury road would cause complications there and downn Court Lane: if it indeed must go ahead then additional access to the Lower Westbury Road should be part of the plan since it is impracticable to improve court Lane.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	515	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The land suffers from serious flooding already currently impacting severely on the built form around it. Any further water entering the drainage system will exacerbate this and will break the Environment Agency 'Lifetime surety' to be free of flooding for at least 100 years for homes already existing. Photographic evidence clearly illustrates the quantity of clay underlying the site and the innate inability of the geology to safely remove current surface water without the addition of additional surface run-off.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	516	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Bird and animal species will be denied an ecological niche which has been in existence for a documented 100+ years. Access to the potential site cannot be through the Important and protected hedgerow.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	517	Consultee Mrs Jane Keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125371		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The land suffers from serious flooding already currently impacting severely on the built form around it. Any further water entering the drainage system will exacerbate this and will break the Environment Agency 'Lifetime surety' to be free of flooding for at least 100 years for homes already existing. Photographic evidence clearly illustrates the quantity of clay underlying the site and the innate inability of the geology to safely remove current surface water without the addition of additional surface run-off.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	518	Consultee Dr Ken Taylor Person ID: 1124364	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site Nos. H3.1 and H3.3 at Netherhampton on the A3094			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not proven feasible by integrated planning for jobs, housing and mobility. See below. Carry out appropriate holistic planning - see below after question: "Please set out what change(s) you consider necessary to make the draft Wiltshire Housing Site Allocations Plan sound". Comments seen as a resident of Quidhampton.</p> <p>Traffic</p> <p>The developments H3.1 and H3.3 would mean much more traffic on local roads, including Lower Road, Quidhampton on the other side of the valley, as people seek to avoid Wilton Wall traffic lights and Harnham gyratory.</p> <p>Quidhampton residents have observed that the A3094/Lower Road junction has recently been the site of several road accidents.</p> <p>Quidhampton has particular problems with long sections of road without pavements that have to be used by parents with young children walking to and from school. Increasing the already significant traffic and risks is unacceptable.</p> <p>The "Salisbury Transport Strategy" (a summary was produced in November 2012, but it was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Five years later the situation is even worse – how can it cope with the traffic that would be generated by this development? The serious traffic congestion in the Salisbury area results from traffic from the main routes (A36, A30, A354, A338) all having to pass through the conurbation including via the A3094. An outer ring road has not been feasible historically owing largely to the geography of the five river valleys, and attractive rural setting extending well into the city. As a result of the obvious existing congestion, I consider that a major survey and integrated planning study should be undertaken to provide feasible scenarios for the Salisbury area for jobs, housing and mobility (public transport, traffic, walking and cycling) and the associated infrastructure. Only then would the feasibility be known for any additional housing together with the infrastructure implications. Innovative solutions for mobility would certainly be required given the geographical and other constraints. Until such work is undertaken and any implications addressed, I believe that housing development H3.1 and H3.3 should not be planned. The existing business and private traffic congestion experienced on the routes affected on both sides of the valley would be increased, as would the safety risks to people, more notably pedestrians and cyclists.</p>			

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To give the public opportunity to directly express their support or describe concerns.

Comment ID:	519	Consultee Feltham Properties	Agent Mr Steven Smallman Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125376	Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.22-5.37		Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Market Lavington Neighbourhood Development Plan (NDP) is under preparation. The Neighbourhood Area was designated in 2015 and public consultation has taken place. The pre-submission Draft Plan is expected to be published within the next few weeks. The draft NDP will recognise that Market Lavington is the only Local Service Centre in the Community Area and it will propose to make housing allocations in accordance with Core Policy12. There is therefore no justification for the HSAP to usurp the NDP. To do so, emasculates the emerging NDP, rendering it effectively obsolete, and would be entirely inconsistent with national planning policy which is to encourage and support local communities to engage in neighbourhood planning. The draft HSAP is therefore inconsistent with Paragraph 185 of the NPPF which confirms that "Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation". It fails to conform to the adopted Core Strategy which at Paragraph 1.5 confirms that site allocation plans should "complement neighbourhood planning".</p> <p>Delete Paragraphs 5.22 to 5.37 - including proposed housing allocations H1.2 (Underhill Nursery), H1.3 (Southcliffe), and H1.4 (East of Lavington School).</p> <p>Replace with: "In the event that the Market Lavington Neighbourhood Development Plan is not adopted by the end of 2018, the LPA will consider whether it is expedient to bring forward housing allocations at the Village as part of the review of the Core Strategy or the HSAP."</p>				
Attached files (Please see Objective)	4707551				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The omission of Land at The Spring, Market Lavington, raises substantial doubt about the soundness of the HSAP, because of serious deficiencies with the Site Selection Process, the relationship of the Plan with the emerging Neighbourhood Plan and the adequacy of the Plan's housing provision (as it relates to the Devizes Community Area).				

Comment ID:	520	Consultee Feltham Properties	Agent Mr Steven Smallman Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125376	Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.2 Devizes Community Area Topic Paper			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Notwithstanding and without prejudice to the above [Comment 519], the draft HSAP has not been positively prepared. The three proposed allocations at Market Lavington are said to have the potential to delivery 80 dwellings. Therefore, if each of the proposed allocations delivers the amount of housing proposed (which we doubt will be achieved), the HSAP would still have to rely on windfall sites coming forward to meet even the minimum requirements of the Core Strategy. This is not acceptable when the "indicative residual requirement" (see table below -[in document attached to this comment]) of 102 dwellings must be regarded as an absolute minimum (as the Plan acknowledges at Paragraph 4.2) given that:</p> <p>the NPPF's objective is to boost significantly the supply of housing (Paragraph 47) and the adopted Core Strategy's overall requirement of 42,000 dwellings is based on an outdated SHMA. This was recognised by the Core Strategy's Inspector when he concluded "that at this time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more" (Paragraph 81 of Inspector's Report). Whilst the updated SHMA has yet to be published, it is understood to confirm that the latest Objectively Assessed Need is greater than the Core Strategy provides for.</p> <p>The Plan has not therefore been positively prepared.</p> <p>Allocate sufficient sites to accommodate at least 100 dwellings at Market Lavington. [Reference to Table 2.2 of the draft Wiltshire Housing Site Allocations Plan, as shown in attached document.]</p>				
Attached files (Please see Objective)	4707551				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The omission at Land at The Spring, Market Lavington, raises substantial doubt about the soundness of the HSAP, because of serious deficiencies with the Site Selection Process, the relationship of the Plan with the emerging Neighbourhood Plan and the adequacy of the Plan's housing provision (as it relates to the Devizes Community Area).				

Comment ID:	521	Consultee Feltham Properties Person ID: 1125376	Agent Mr Steven Smallman Director Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Notwithstanding, and without prejudice to, the above [comment 519 and 520], the draft HSAP is not justified because the allocation of land at Fiddington Hill / Underhill Nursery to accommodate 50 dwellings is not the most appropriate strategy when considered against the reasonable alternative of allocating that site for significantly less dwellings (circa 20) and allocating Land at the Spring for 30 dwellings. development of Land at the Spring in the manner proposed is entirely logical and appropriate because: It would represent a logical completion of the existing settlement pattern by “infilling” the linear development along the B3098 The site is visually and physically contained so that development will not have an adverse impact on the landscape setting of the village The site is in a highly sustainable and accessible location on the edge of the village centre The site is not subject to any significant constraints. Its development would have no unacceptable impact in terms of highways, heritage, ecology, trees, flood risk or landscape and visual impact. The site is deliverable. Land at the Spring is acknowledged to be potentially developable in the SHLAA and is proposed to be allocated in the emerging NDP. The site was however rejected after Stage 3 of the Site Selection Process (Sustainability Appraisal) on the grounds that it was of “high archaeological potential” and that therefore its development would have a “major adverse effect” (see below extract from Wiltshire Housing Site Allocations Plan Pre-submission draft plan Community Area Topic Paper – Devizes June 2017). [Comment references Table 6.4 of the Devizes Community Area Topic Paper, and this table is reproduced in the document attached to this comment.] That assessment was without foundation and entirely erroneous. As the Call for Sites Submission Statement submitted on the 10th November 2016 made clear, a full Archaeological Trench Evaluation was undertaken by Absoute Archaeology in May 2016 (this followed an earlier desk based assessment carried in Decemenber 2015 by HPS Archaeological Services) which has been reviewed by the Council’s Archaeologist. That evaluation Report concluded: “An archaeological trench evaluation was carried out from the 9th – 11th May 2016. The results revealed evidence of extensive 19th century clay extraction across the Project Site. Early 19th century pancheon and red brick, along with evidence of the relocation of the stream that defines the southern boundary of the site, suggest an early 19th century date for the activity. As a result, the Project Site has been severely truncated, which has significantly reduced the potential for earlier archaeological deposits to survive.” The Call for Sites Submission Statement also confirmed that a detailed Hydrological Study has been undertaken which demonstrated that the site is not at risk from fluvial flooding and an Extended Phase 1 Protected Species Assessment and subsequent Bat survey were undertaken which confirm, that subject to the implementation of a suitable Ecological Mitigation Plan, the development of the site in ecology terms is acceptable.</p>			

	<p>More recently, a full Flood Risk Assessment has been completed which confirms that the site is not subject to flood risk and a Heritage Impact Assessment confirms that the development of the site would not harm the significance of the Conservation Area (or any other designated or un-designated heritage asset).</p> <p>Land at the Spring is a site that the emerging Neighbourhood Plan will propose to allocate as part of a strategy of dispersed growth. There was no reasonable basis for rejecting the Site during the HSAP's site selection process. To fail to allocate Land at the Spring and instead to allocate the Land at Fiddington Hill / Underhill Nursery for 50 dwellings, is demonstrably not the most appropriate strategy for delivering the requirements of the Core Strategy. The HSAP is therefore not justified.</p> <p>Allocate Land at the Spring for "about 30 dwellings" and reduce the allocation of Underhill Nursery to "up to 20 dwellings".</p>
<p>Attached files (Please see Objective)</p>	<p>4707551</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The omission of Land at The Spring, Market Lavington, raises substantial doubt about the soundness of the HSAP, because of serious deficiencies with the Site Selection Process, the relationship of the Plan with the emerging Neighbourhood Plan and the adequacy of the Plan's housing provision (as it relates to the Devizes Community Area).</p>

Comment ID:	522	Consultee Feltham Properties	Agent Mr Steven Smallman Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125376	Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Notwithstanding, and without prejudice to, the above [comment 519 and 520], the draft HSAP is not justified because the allocation of land at Fiddington Hill / Underhill Nursery to accommodate 50 dwellings is not the most appropriate strategy when considered against the reasonable alternative of allocating that site for significantly less dwellings (circa 20) and allocating Land at the Spring for 30 dwellings. Land at Fiddington Hill / Underhill Nursery is an illogical and unsuitable site to accommodate the amount of housing proposed, for the following reasons [each reason is included in a separate comment]:</p> <p>The allocation would result in a further incongruous and uncharacteristic accretion on the eastern side of the village.</p> <p>The existing access to the site from Fiddington Hill is unsuitable to serve the amount of development proposed. This is a narrow rural lane that extends as a bridle way to provide an important recreational route to the Wessex Ridgeway and the Salisbury Plain SSSI / SPA. Road widening (even if that could be achieved) would result in the loss of a mature hedgerow (likely to be of ecological significance) and generally would have a serious adverse impact on the character and appearance of the area.</p> <p>The site has little visual or physical containment. It is in a sensitive location on the outer edge of the village and open to views from the adjoining countryside. Development would have a severe visual impact on the landscape setting of the village.</p> <p>It may be that a smaller scheme, restricted to the western corner of the site (the area currently occupied by glasshouses, hardstanding and car parking and an existing house) could be sensitively developed to address the substantial constraints identified above - although that has yet to be proven.</p> <p>Allocate Land at the Spring for “about 30 dwellings” and reduce the allocation of Underhill Nursery to “up to 20 dwellings”.</p>			
Attached files (Please see Objective)		4707551			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The omission of Land at The Spring, Market Lavington, raises substantial doubt about the soundness of the HSAP, because of serious deficiencies with the Site Selection Process, the relationship of the Plan with the emerging Neighbourhood Plan and the adequacy of the Plan's housing provision (as it relates to the Devizes Community Area).			

Comment ID:	523	Consultee Ms Rachel Hunt Person ID: 1102653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Residents Comments on The Wiltshire Core Strategy and Housing Allocations This document has been written to strongly oppose the allocation of housing on fields behind Church Lane. There are six main areas of objection to the proposals set out in the core strategy: Contradictions between the core strategy and national Planning policy regarding Brownfield vs Green fields sites Flooding Maintaining the Setting of Heritage sites (omission of listed buildings when proposing housing sites) Maintaining the rural and ecological environment Accessibility Suitability of the Church Lane site when assessed by Atkins Section 7 of this objection will outline viable alternative sites. Section 7 of this objection will outline viable alternative sites. 1. Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 111, 72, 156 and 157 of The National Planning Framework and Planning Guidance documents are as follows: 111 - Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. 72 - The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. 156 - Local planning authorities should set out the strategic priorities for the area in the local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. 157 - Local Plans should: plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework; be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;			

identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation; identify land where development would be inappropriate, for instance because of its environmental or historic significance; and contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

In addition to this the Wiltshire Local Development Framework states:
 "the preferred option comprises a collection of sites that could deliver a coherent sustainable urban extension to the South East of Trowbridge and a town centre strategic site"

There are clear contradictions to these statements in the core strategy as follows:

- Infrastructure - The plan is for 6,000 new homes for the Trowbridge area. Ashton Park has 2,000 already built and a further 2,600 are to be built there by 2026. However there has been a two year delay at the Ashton Park site caused by a debate regarding bats in the woods meaning the 2,600 houses will not be built by the 2026 deadline. The new sites named in the core strategy are designed to meet this shortfall, however the sites chosen are not large enough to require the developer to provide increases in infrastructure (schools and healthcare). This crucial provision of additional school places and healthcare will not be met unless the West Ashton Site is fully developed. This site already has a new road and would fulfil all these requirements - smaller sites cannot be used as a replacement.

The Core strategy appears to have been written with developers, not the local communities in mind and it would appear that it has opted for smaller "developer friendly" sites in which developers are not required to provide affordable housing and infrastructure as opposed to one larger site which could clearly provide the needs of the whole of Trowbridge.

- Brownfield sites - Potential (windfall) housing on Brownfield sites including Bowyers, the old library site on Bythesea Road and many others have not been included in Wiltshire Council's housing allocations, which if they were we would not need the proposed new Greenfield sites to be developed;
- A further 82 homes are going to pre-application on Bradley Road (West Wilts site). These appear not to have been included in the allocation and are simply seen as windfall sites.
- Several sites were ruled out during the SHLAA process, the reason given being that they were inside the existing town boundary. Why are these sites not being fully developed BEFORE open countryside is touched? Other towns (Melksham and Westbury) are better able, and indeed in the case of Melksham possibly keen to take more housing development, and that such alternative locations should be considered in preference to yet more Trowbridge development;
- The strategy does not identify and offer protection to all listed buildings and has not offered protection to areas of historical significance
- The lack of inclusion in developing the Bowyers site as part of the planned housing in Trowbridge does not comply with National Planning Policy paragraph 111above.

In conclusion, it appears that Wiltshire Councillors, none of whom live in Trowbridge, have arbitrarily set a 2km radius from St James's Church as the allowable developable area for the town without taking account of the value of this land to the people of Trowbridge. A perfectly circular boundary would appear to be a means of developing easier greenfield sites rather than more difficult brownfield sites.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	524	Consultee Ms Rachel Hunt Person ID: 1102653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Residents Comments on The Wiltshire Core Strategy and Housing Allocations This document has been written to strongly oppose the allocation of housing on fields behind Church Lane. There are six main areas of objection to the proposals set out in the core strategy: Contradictions between the core strategy and national Planning policy regarding Brownfield vs Green fields sites Flooding Maintaining the Setting of Heritage sites (omission of listed buildings when proposing housing sites) Maintaining the rural and ecological environment Accessibility Suitability of the Church Lane site when assessed by Atkins Section 7 of this objection will outline viable alternative sites. Section 7 of this objection will outline viable alternative sites. 2. Flood Risk at the Church Lane site The area of land identified for proposed development of some 45 houses is an area already known to be prone to flooding, particularly during winter months. The southern edge of the proposed development is skirted by Lambrok Stream. Local residents, and anyone who walks in the Southwick Country Park know that in the winter months the landscape around the stream is waterlogged and some paths at the northern end of the Country Park will flood, sometimes for weeks. The gradual progression of global warming and climate change means the trend is towards warmer and wetter winters, and indeed warmer and wetter summers and ever-increasing levels of precipitation. A fluvial flood event was recorded at the proposed development site on 2th December 1979 when for several days the main river flooded when the channel capacity was exceeded. A considerable area of land each side of the stream was flooded. There are many other recorded issues and concerns regarding flooding and flood risk in areas of Trowbridge and nearby hamlets adjacent to the Lambrok Stream, a few of which are quoted below: Heart Radio website reported on 3rd November 2011 that people at risk of flooding from Lambrok Stream in Trowbridge will benefit from improvements to the Environment Agency's free flood warning service. "We know that certain parts of the River Biss, Paxcroft Brook and Lambrok Stream will flood earlier while other areas will flood later and only when the levels continue to rise," said Paul Hardy for the Environment Agency. On 23rd November 2012 the Environment Agency issued flood warnings for Lambrok Stream. 3rd March 2015. Twelve neighbours living at Acacia Crescent, Trowbridge raised concerns about flooding relating to Lambrok Stream and planning application 14/06917/OUT for a development of some 30 properties. Their comments included the incidence of recent flood events associated with high water levels in the River Biss, flood water backing up very quickly in the Lambrok stream, rapidly affecting the land to the				

rear of Acacia Crescent, and threatening the flooding of those properties. Water routinely enters gardens. The Environment Agency issues warnings to these properties as they are in their declared flood zone. The residents stated that one thing they knew for certain was that the Lambrok stream floods after short periods of heavy rain.

14th February 2017. The Save Our Southwick campaign group have voiced many objections to the Outline Planning Application 16/12279/OUT by Redrow Homes to build 100 homes on Blind Lane in Southwick village. Aspects relating to flooding and Lambrok Stream relevant to the proposed Church Lane development include: the development is partially on a flood zone 1 and extremely close to flood zones 2 and 3. This area of land is on clay and the water table level is always very close to the surface. When the water flows from the attenuation pond it will feed into the Lambrok stream at a single point and this will increase the volume of water being carried off towards Trowbridge. (This suggests that if the Redrow development is approved it could lead to greater flows in Lambrok Stream further increasing the risk of flooding in the vicinity of the proposed Church Lane development, as well as to other residential areas near to the Lambrok Stream throughout Trowbridge). Lambrok stream hasn't been able to cope with the water volume and has flooded the gardens south of Blind Lane in Southwick. This has happened on three occasions since 2012 which shows that the flood zone models used for these flood calculations are out of date. The Lambrok Stream on the site runs in three directions and the site is on a well-known floodplain. Flooding has been frequently witnessed in these fields and within some of the housing surrounding them, especially during autumn winter and spring. Application 13/02007/OUT being a property on the corner of Blind Lane/Wynsome Street was recently refused planning permission by Wiltshire Council, due to the level of existing flooding in the area. The campaign group also state that if development proceeds despite the concerns of local people the developers and/or existing landowners should be required to set aside funds in order to compensate future flood victims in the neighbourhood.

The River Levels independent website www.riverlevels.uk/floodwarning has identified land alongside the full length of Lambrok Stream from Acacia Road in the centre of Trowbridge all along the line of its flow to Southwick Village for flood alerts and warnings.

Flooding at the bottom of the Old Brickfields Fields 2016 taken from the main road

[Attached photo - attachment 1]

Whilst the Church Lane proposed development area currently comprises green fields, rough grasslands and paddocks the land acts like a sponge in the wet winter months absorbing rainfall over the whole area of the site and sending much of it down to the water table below, with a much lesser volume of water draining gradually into the Lambrok Stream. This means surface water run-off is minimised and flooding in the area is less than it would otherwise be.

However, if the proposed development site were to be approved it would lead to the area being covered by highway tarmac, pavement and houses. Instead of rainfall soaking into the land the incidence of 'run-off' of water would increase significantly causing excessive and concentrated rain flow into the Lambrok Stream. This would severely threaten the new homes, as well as existing nearby properties and the adjacent Southwick Country Park with surface water flooding.

Furthermore, the consequentially raised water table in the area of the new and existing properties could also undermine their physical structure and increase the risk of heave and subsidence. It is common knowledge that clay soils that are repeatedly waterlogged in wet winter months and then dried in dry summers will expand, shrink and crack greatly. The Environment Agency website www.gov.uk/check-flood-risk identifies the land 100-200m all along either side of this section of the Lambrok Stream to be at HIGH RISK of flooding (21st June 2017).

The Environment Agency's concerns about increased levels of irresponsible building development in floodplain areas in the UK in recent years are well-known. The lower section of the earmarked field at Church Lane is classified as floodplain, and it seems foolish to consider it for development when it is bordered by a stream and known for local flooding and waterlogging, whilst many other potential development sites have been identified in Wiltshire, as well as a number of available large 'Brownfield' sites, which do not have the same proximity to streams and rivers with the associated flood risks.

National Planning policy states:

156 - Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

the provision of health, security, community and cultural infrastructure and other local facilities; and

climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

The Government's Planning Portal Planning Policy Statement 15: Planning and Flood Risk Annex B: Development and Flood Risk says:

B11 New development can increase indirect flood risk in locations beyond the development site simply by increasing the amount of run-off from the developed area. This may occur where permeable surface areas are reduced by construction work leading to increases in the volume and speed of water transported through a catchment.

B12 Where development, for example, a poorly located bridge across a river, restricts the capacity of the drainage system to convey water through an area, this will increase the flood risk adjacent to and upstream of that development. This will create the potential for flooding to occur more often and to greater depths. Development that impairs the conveying capacity of the flood plain can also exacerbate risk by encouraging the gathering of water borne debris that may further restrict floodwater flows.

B13 Buildings and the construction of other hard surfaces also have the potential to increase downstream flood risk by decreasing flood plain storage and increasing the scale or speed of run-off.

So, development at Church Lane, in addition to exacerbating flooding and the other identified risks at this site, could also increase flooding issues anywhere along the line of the Lambrok Stream which ribbons its way across Trowbridge, through Wingfield, North Bradley, Southwick and beyond. If development causes additional water flow or blockage or obstruction at any point along the stream this could impact upon properties near to the stream anywhere along its line. Development anywhere along the line of the stream should therefore be investigated very thoroughly to assess the potential detrimental flooding consequences all the way along the line of the stream.

The Environment Agency's website under the Flood Map for Planning tool has been interrogated (28th June 2017). It shows that the lower end of the proposed development site registers as a category flood zone 2 or 3 which requires the developer to carry out a Comprehensive Flood Risk Assessment.

The outline planning application that Trowbridge Town Council was consulted on identifies the Church Lane site as the whole field right down to the Lambrok Stream. This area includes the floodplain zone 2/3 section of the field. The Trowbridge Town Clerk advises, however, that when the planning application progresses he expects the developer only to include the upper two-thirds of the field, the section above the floodplain (flood zone 1) which does not normally require any flood risk assessment. However, given that any run-off of water from the development would pass straight into the flood zone 2/3 area and into the Lambrok Stream with all the associated risks outlined above to the immediate neighbourhood as well as elsewhere up and downstream I believe the development should still be disallowed on flooding grounds.

I once worked in a large city council Engineering Department. One of our fully qualified engineers told me his house was built on clay and that he spent his summer evenings not spraying the plants in his garden but instead he sprayed the foundations of his house to prevent the clay beneath drying out to try to reduce the risk of subsidence. Wiltshire Council should take heed - it would be far better to build houses on a level and stable site, preferably a tried and tested Brownfield one than to build on a virgin Greenfield slope of clay, on a gradient and alongside a stream that has a history of flooding and ground saturation every winter. The costs of flooding and/or subsidence are always high.

Local hearsay...one of our neighbours has said she was recently walking in the area in question when she stumbled upon a Wiltshire Council officer and asked him if the Council was planning to develop the land. He apparently answered on the lines of, 'Not a chance. We wouldn't build on floodplain'.

Photos of flooding on the site:
 [Attached photos - attachment 2]

In conclusion, flooding remains a risk for new homes and increased run-off will impact on Southwick Country Park.

Attached files (Please see Objective) 4707126 / 4707127

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	525	Consultee Ms Rachel Hunt Person ID: 1102653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Residents Comments on The Wiltshire Core Strategy and Housing Allocations This document has been written to strongly oppose the allocation of housing on fields behind Church Lane. There are six main areas of objection to the proposals set out in the core strategy: Contradictions between the core strategy and national Planning policy regarding Brownfield vs Green fields sites Flooding Maintaining the Setting of Heritage sites (omission of listed buildings when proposing housing sites) Maintaining the rural and ecological environment Accessibility Suitability of the Church Lane site when assessed by Atkins Section 7 of this objection will outline viable alternative sites. Section 7 of this objection will outline viable alternative sites. 3. Maintaining the Setting of Heritage Sites Listed Buildings The sites at the back of Church Lane provide a rural setting for 7 Grade II Listed buildings as follows: - St Johns Church School and Hall masters dwellings comprising 4 dwellings. (UID1021593) - Church of St Johns (UID 1364192) - 344 Frome Road (UID 1364193) - Rose Villa (UID 1021594). National policy states that: 129 - Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. 132 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. The photographs below clearly show that current development on this side of town has enabled these buildings to maintain their historic setting. [Attached photos - attachment 1]				

	<p>Also, when purchasing 344 Frome Road we contacted the Wiltshire Planning Department regarding future building on the fields that directly backs onto the Grade II listed cottage. In the reply they were informed that "the land that backs onto 344 is outside the development policy boundary for housing and therefore any application to develop the land is likely to be refused by the council.</p> <p>In addition to the listed buildings at this site there is also an ancient water meadow: MWI73579 Water Meadow, West of Upper Studley</p> <p>Summary A post medieval water meadow is visible as earthworks on air photographs.</p> <p>References National Monuments Record, ST 85 NW 95 English Heritage Archives, 1577543</p> <p>Grid reference ST 8403 5643 (map quarter sheet ST85NW)</p> <p>In conclusion, development will inevitably affect the historical setting of this area.</p>
Attached files (Please see Objective)	4707134
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	526	Consultee Ms Rachel Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1102653	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Residents Comments on The Wiltshire Core Strategy and Housing Allocations This document has been written to strongly oppose the allocation of housing on fields behind Church Lane. There are six main areas of objection to the proposals set out in the core strategy: Contradictions between the core strategy and national Planning policy regarding Brownfield vs Green fields sites Flooding Maintaining the Setting of Heritage sites (omission of listed buildings when proposing housing sites) Maintaining the rural and ecological environment Accessibility Suitability of the Church Lane site when assessed by Atkins Section 7 of this objection will outline viable alternative sites. Section 7 of this objection will outline viable alternative sites. Maintaining the rural landscape of the area National Planning Policy States: 112 - Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. 113 - Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. As well as offering a rural setting for the heritage assets here, the land between Church Lane and Southwick Country Park provides a part of the buffer between Southwick and Trowbridge and is well used wildlife. Both fields have had the same hedge line since at least 1890 and 1790-1874 as shown by the OS map below. (dated 1890) Similar maps from the 1920's and 1940's show the exact same hedge line. [Attachment 1] The Hedgerow Act 1997 states that a hedgerow is historic if: 1. The hedgerow marks the boundary, or part of the boundary, of at least one historic parish or township; and for this purpose "historic" means existing before 1850. 3. The hedgerow- (a) is situated wholly or partly within an archaeological site included or recorded as mentioned in paragraph 2 or on land adjacent to and associated with such a site; and (b) is associated with any monument or feature on that site. Countryside hedgerows: protection and management (Extract from Land Management, Natural England 11 September 2014, Last updated: 16 August 2017) states that:</p>				

A countryside hedgerow is protected if it meets the following criteria for:

Length - "more than 20m long with gaps of 20m or less in its length"

Location - "next to a local nature reserve (Southwick Country Park)"

'importance' - "is completely or partly in or next to an archaeological site listed on a Historic Environment Record (HER), (formerly a Sites and Monuments Record)"

The hedgerow surrounding the Site 1021 is recorded on the OS 1890 map and the OS Old Series 1791-1874 (published 1805-18740). It also provides the boundary for the Ancient Monument scheduled above and is therefore considered "Important"

The hedgerow around the site meets all three criteria and therefore needs to be protected.

In the more recent past, the first field has been used for grazing animals for at least the last 30 years and the larger field behind Framfield offers wide ranging views across the countryside and is home to pairs of deer as well as bats, rabbits, voles and a range of birds.

The WCS states that Bechstein Bats (and others) use the sites behind Church Lane and Old Brick Fields. The document states that bat corridors should be built into any proposed development. In fact the current owners of the larger field cut a large gap in the hedge some years ago (presumably to allow vehicles through). The defra document "Habitat management for bats A guide for land managers, land owners and their advisors" states that "even gaps as small as 10 m may prevent bats - especially the smaller species - from using hedgerows as a route to fly between roosts and foraging areas." And that "Gaps should be replanted to ensure that the hedge can be used as a flight route." Further gaps, which would inevitably be needed to develop the site, would affect the bats and other ecology of the site.

When contacting the council regarding the reasons for delay of the West Ashton site, the reason given was "The application has been delayed because the applicant is addressing ecology objections relating to a colony of bats in nearby Biss Wood. It is anticipated that a revised masterplan and environmental statement will be submitted by the applicant to address the objection in the near future, at which time all interested parties will be notified and given a further opportunity to make representations. All things being equal, the application may then be presented to the Council's Planning Committee for determination towards the end of the year."

In August 2017, bats were monitored over two 12 hour periods at "Framfield" Church Lane. During this time, 12 breeds of bats were recorded including Bechstein Bats. Details of this monitoring exercise have been passed onto Wiltshire County Council and Wiltshire Wildlife. The bats were tracked crossing the fields from the Country Park to the hedge line in Church Lane.

This presence provides another reason why development should not take place on site 1021.

In 1989 there was an application (w89/0140) to build 2 dwellings on the field behind Church Cottage, Church Lane. This planning proposal was refused on the basis that "the proposed development (of just 2 dwellings) would extend the built up area into open countryside, detrimental to the character of the area," (Extract from the decision notice)

Also, the Secretary of State further notes (in the appeal document) that "the proposal would harm the rural character of the area" and that "the site is outside the limits of Trowbridge" which is still the case.

Thirdly, the appeal document notes that the Plan "seeks to maintain a rural buffer between Trowbridge and Southwick. The proposal would encroach on open rural land and harmfully effect it's appearanceThe appeal site, which is part of a pasture field on the south side of Church lane, is in the pleasant open countryside between Trowbridge and Southwick"

If this is the case for 2 dwellings, 40 dwellings would be extremely detrimental to the rural nature of this area. In fact, the addition of Southwick Country Park since this application would further promote the maintenance of this area as rural, alongside maintaining the setting of St Johns Church, former school houses and Church Cottage.

There was also a historic application (ref APP/F3925/A/02/1082021) regarding an agricultural access off the A361 to the field to the south of Church Lane. This is the proposed site of access to the new dwelling on the Housing Site Allocation Plan. However, when this planning application went to appeal, the Inspector specifically states that there need to be considerations as part of the appeal success. Paragraph 12 states "In the future, for economic reasons, they would expect to lease or rent this land to a local farmer" On this basis the inspector goes on to say that this purpose "seems to be reasonable and therefore agricultural machinery and transport would require access to the fieldtending of livestock would require a small number of visits by light vehiclesArable use may well involve particularly large vehicles and plant but only during more restricted periods"

Since this application the field in question has not been rented or used for agricultural purposes. The only use is that the field was ploughed once about three years ago, not for arable purposes or to grow crops but seemingly to prevent dog walkers and locals from enjoying the site and

	<p>countryside. Also, it is clear from the above evidence that the access was granted ONLY for limited agricultural use NOT for construction or residential traffic which would clearly change the local area.</p> <p>Conclusion, development would be detrimental to protected species of bats and would contradict the Hedgerow Act 1997.</p>
Attached files (Please see Objective)	4707147
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	527	Consultee Ms Rachel Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1102653	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Residents Comments on The Wiltshire Core Strategy and Housing Allocations This document has been written to strongly oppose the allocation of housing on fields behind Church Lane. There are six main areas of objection to the proposals set out in the core strategy: Contradictions between the core strategy and national Planning policy regarding Brownfield vs Green fields sites Flooding Maintaining the Setting of Heritage sites (omission of listed buildings when proposing housing sites) Maintaining the rural and ecological environment Accessibility Suitability of the Church Lane site when assessed by Atkins Section 7 of this objection will outline viable alternative sites. Section 7 of this objection will outline viable alternative sites.</p> <p>4. Accessibility The A361 is a blackspot for accidents both "in the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. The Country Park is also used for running and parking along the A361 between Southwick and Trowbridge is a common cause of delays. In contrast, the West Ashton site, for which the planning is well progressed, already has a new road, one new school and plans for 2 others. Furthermore, sites at Church lane, Boundary Walk and Old Brickfields are being considered as they would reduce traffic as residents would walk into Trowbridge rather than using their own vehicles (as opposed to development in nearby villages where cars would need to be used. No evidence has been provided that this would be the case. The walk into town is neither pleasant or particularly safe and increased traffic would make walking into town less attractive. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frame Road at rush hour. In conclusion, there is not sufficient infrastructure in place for the, already busy Frome Road to take more traffic, causing additional pollution, noise and disruption to the environment and local listed buildings. This is supported by the conclusions made in the "Trowbridge Traffic Model 2026". The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
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of the examination?**

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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Residents Comments on The Wiltshire Core Strategy and Housing Allocations This document has been written to strongly oppose the allocation of housing on fields behind Church Lane. There are six main areas of objection to the proposals set out in the core strategy: Contradictions between the core strategy and national Planning policy regarding Brownfield vs Green fields sites Flooding Maintaining the Setting of Heritage sites (omission of listed buildings when proposing housing sites) Maintaining the rural and ecological environment Accessibility Suitability of the Church Lane site when assessed by Atkins Section 7 of this objection will outline viable alternative sites. Section 7 of this objection will outline viable alternative sites. 5. Review of Atkins "Wiltshire Housing Site Allocations Plan" Atkins were employed to review the six key sites identified by Wiltshire council for housing: Elizabeth Way - 205 houses White Horse Business Park - 150 houses (67% negative impact vs 33%positive) Elm Grove Farm - 200 houses Church Lane - 45 houses (83% negative impact to 17% positive) Upper Studley - 20 houses (80 % negative impact vs 20% positive) Southwick Court - 180 houses (71% negative impact vs 29% positive) Each site was assessed against the following headings Bio-diversity, Water, Historic Environment, Landscape, Accessibility, Education and Housing/ Employment provision. They were given a rating against each objectives (negative impact or positive impact.) The land at Church Lane was the least attractive site of all six. In addition, the sites at Elizabeth Way, White Horse Business Park and Elm Grove farm provide infill between existing developed sites whereas the other three sites would impinge on open countryside. In fact, the recent planning application for 100 plus houses off Blind lane was refused on the basis that it provided "an unwarranted encroachment of the open countryside". This is also the case at the Church Lane, Boundary Walk and Old Brick fields sites. This was rejected based on paragraph 17 of the National Planning Framework: Core planning principles 17: Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should: be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local				

issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;

not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;

proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;

support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);

contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;

encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;

promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);

conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and

take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Attached files (Please see Objective)

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Comment ID:	529	Consultee Ms Rachel Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Residents Comments on The Wiltshire Core Strategy and Housing Allocations This document has been written to strongly oppose the allocation of housing on fields behind Church Lane. There are six main areas of objection to the proposals set out in the core strategy: Contradictions between the core strategy and national Planning policy regarding Brownfield vs Green fields sites Flooding Maintaining the Setting of Heritage sites (omission of listed buildings when proposing housing sites) Maintaining the rural and ecological environment Accessibility Suitability of the Church Lane site when assessed by Atkins Section 7 of this objection will outline viable alternative sites. Section 7 of this objection will outline viable alternative sites. Alternative sites to 1021- Church Lane The Church lane and Upper Studley sites offer 6ha of developable land. Wiltshire Council could easily offer this land using a variety of sites which are within the town. The following sites should be used before encroaching on our countryside: Site 1018 - Former District Council Offices, Bradley Road (2.46ha) Site 198 - Land and Buildings (0.33ha) Site 247 -The Stables (0.7ha) Site 248 • Dryhnam Lane (1.68 ha not yet accounted for) This site is ideal for development as it would complement development which is already planned for this part of town These sites alone would provide 8.5ha of land for development which would mean that none of the open land between Southwick and Trowbridge need be touched. All of these sites could be developed within the next 10 years. In addition to this there is: Bowyers The old Virgin site Ashton Street Centre The John Bull Pub which is derelict and for sale on Studley Green The old "Total Bathrooms" showroom next to Bowyers (ideal for 1bedroom flats -affordable living) East Wing/Trowbridge Hospital Mary Stancomb School</p>				
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Comment ID:	530	Consultee Ms Rachel Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition to these, other sites were dismissed as part of the SHLAA, the reason given for this was that they were within the current settlement boundary. The National Planning Policy states, "planning policies and decisions should encourage the effective use of land by re-using land." It appears that Wiltshire Council have decided that developing infill sites would be less attractive to developers and have therefore chosen open sites which do not need to be built on to fulfil their housing quota. Surely Wiltshire Council should not opt for the easy, developer led option to the detriment of our countryside, wellbeing and wildlife.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	531	Consultee Dan Noutch Person ID: 1125418	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing as part of the public consultation into the possibility of developing 280 homes on Site 3565 known as 'Land east of A361 at Southwick Court'.</p> <p>As a local resident, I believe that building on Site 3565 would be detrimental to the local community, landscape and biodiversity. Site 3565 has been deemed to be 'less sustainable' than other sites in Trowbridge in the Sustainability Appraisals and it's my belief that the proposals to develop on this site are contrary to multiple Core Policies that are outlined in Wiltshire Council's Core Strategy and contrary to the Trowbridge Area Strategy. Moreover, I believe that there are inconsistencies in the Sustainability Appraisals carried out for Site 3565 in comparison with other sites within Wiltshire. Therefore, as you will read in my letter, I believe that Site 3565 should 'not be considered further'.</p> <p>Commitment to not building between Trowbridge, North Bradley and Southwick</p> <p>In Wiltshire Council's Core Strategy document released in 2015, in the section headed Trowbridge Area Strategy, it was clearly stated that "it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities." However, developing 280 homes on Site 3565 clearly goes against Wiltshire Council's strategy to leave the land between Trowbridge, Southwick and North Bradley untouched. Not only will this plan go against Core Policies 50, 51 and 58, but it will also disrupt the character and identities of the small villages that you want to maintain, which will no doubt cause social unrest.</p> <p>How has Site 3565 even made it to Stage 3 of the Housing Site Selection process? It is evident that the strategy for the Trowbridge area has not been taken seriously. Wiltshire Council have made it clear that they want to ensure that they "protect the character and identity" of villages such as North Bradley and Southwick. Building 280 new homes in-between these villages will achieve exactly the opposite. If development on Site 3565 goes ahead, this would set a precedent to other developers that this policy can be overlooked, not just at land close to Site 3565, but at other sites throughout the county. If this happens, it won't be long until Southwick and North Bradley just become suburbs of Trowbridge in the same way Hilperton has, thus making a mockery of Wiltshire Council's commitment to not developing between Trowbridge, Southwick and North Bradley. How many other commitments in the Core Strategy are Wiltshire Council happy to backtrack on?</p> <p>It is baffling that Wiltshire Council entertain the idea of building on Site 3565, carrying out Sustainability Appraisals and assessing its suitability to be developed upon, when it not only opposes to multiple Core Policies, but it also undeniably and plainly goes against one of the first issues and considerations it has for the Trowbridge area.</p> <p>Developing on Site 3565 is contrary to Core Policy 50 Landscape which states that "there is a need to protect the distinct character and identity of the villages and settlements in Wiltshire." I'm unsure how building on Site 3565 protects the character or identity of nearby settlements. The fields on Site 3565 are a fundamental part of the rural character and identity of the area surrounding Southwick, North Bradley and Trowbridge. Developing Site 3565 will remove this character. Furthermore, developing upon Site 3565 would go against Core Policy 51 when it states "Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon</p>				

	<p>landscape character.” Building 280 homes on Site 3565 will not protect, conserve nor enhance the landscape and its character that is deeply treasured by those in the community.</p> <p>Conclusion</p> <p>Overall, it’s perfectly clear that there are inconsistencies with the Sustainability Appraisals that have been carried out in Wiltshire. Developing on Site 3565 is contrary to multiple Core Policies and clearly contradicts Wiltshire Council’s commitment to not build on land between North Bradley, Southwick and Trowbridge. As mentioned, if building on Site 3565 takes place despite the commitment Wiltshire Council made not to just two years ago, this sets a scary precedent for further developments which will see developers rubbing their hands as they look to sites that they previously thought would be out of question. Wiltshire Council developing on Site 3565 would show nothing more than a lack of integrity and a lack of commitment to the residents that it stands for.</p> <p>The fact that Site 3565 has made it this far also just begs the question what is the point of a Core Strategy if Wiltshire Council backtrack on key promises so soon after making them in important documents. This breeds a lack of confidence in the institution that residents are supposed to have confidence in. This lack of confidence will not just remain with development proposals, but will also spread into other work that Wiltshire Council does and documents that they release.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Core Policy 58 Site 3565 isn't suitable for the construction of 280 homes as it does not align with Core Policy 58 of the Wiltshire Core Strategy which outlines "that Wiltshire's important monuments, sites and landscapes and areas of historic and built heritage significance are protected and enhanced in order that they continue to make an important contribution to Wiltshire's environment and quality of life." The open countryside around Southwick Court Farmhouse, which is located by Site 3565, contributes largely to this heritage asset being Grade II* listed. This setting would be lost if Site 3565 is developed. If the effects on the heritage asset are mitigated by screening as outlined in the Sustainability Appraisal assessment outcome, the rural setting that is a fundamental part of it being a Listed Building will be lost. Mitigation in the form of screening wouldn't be suitable mitigation due to the loss of setting. Because of this, I believe that Site 3565 should be assessed to have major adverse effects in terms of SA Objective 6 rather than moderate adverse effects. There are numerous sites in Wiltshire that have been deemed to have major adverse effects in terms of SA Objective 6 that won't be pursued further. Site 3554a in Salisbury was deemed unsuitable for development and will not be taken further to Stage 4a. In the Sustainability Appraisal for Site 3554a, it says: "Given the proximity of designated and undesignated heritage assets and a strong rural character to the area, development of this site for housing is likely to result in major adverse effects that cannot be mitigated." Furthermore, it says: "The bridge, the farm and the house in part derive their interest from being located in a rural setting. Development in the eastern part of the site is likely to harm the setting of Milford House." This shows that the historical assets close to Site 3554a pride themselves on their setting and being in a rural area. It is my belief that the same applies to Southwick Court Farmhouse close to Site 3565. As already mentioned, Southwick Court Farmhouse will lose its definition once it is 'screened'. This building should be celebrated and be shown off, not hidden away behind trees. While the Milford Bridge at Site 3554a is Grade I listed, I don't believe that Grade I listed buildings are given any more protection than a Grade II* or a Grade II listed building. The setting of these historical assets should be protected and where possible enhanced. The assessments of Site 3565 and 3554a for Objective 6 is inconsistent. All sites must be assessed in equal weighting. Site 3565 should be reassessed to have major adverse effects for SA Objective 6 and the Council shouldn't consider the site for development any further.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	533	Consultee Dan Noutch	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125418		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flood Risk Part of Site 3565 also falls under the Environment Agency's Flood Zone 2 and Flood Zone 3 in its flood map for planning. Whilst the majority of Site 3565 falls under Flood Zone 1, it is concerning that homes could be built on and close to this area that is at a high risk of flooding. If development commences on Site 3565, this land will be concreted over, increasing surface run off. Developing homes close to these areas that are at high risk of flooding will mean that some form of attenuation scheme will be implemented. However, this will lead to the surface run-off to be put back into Lambrok Stream elsewhere which will lead to other homes to be at risk of flooding, in places such as Wynsome Street and Chantry Gardens in Southwick.</p> <p>Having looked into other sites in Wiltshire that will not be taken forward to Stage 4, there are sites that are entirely in Flood Zone 1. For example, in one of Wiltshire's other principal settlements, Salisbury, the Old Sarum site (site S80) is entirely in Flood Zone 1. It will not be taken further into Stage 4 but in its Sustainability Appraisal Report was not assessed to have any major adverse effects and is fit for 254 dwellings. Furthermore, site S159 which is completely in Flood Zone 1 and in the principal settlement of Salisbury will not progress to Stage 4. Site 3421 is another site in Salisbury that will not be considered for Stage 4 despite having no major adverse effects yet is completely in Flood Zone 1 unlike Site 3565. These are just three sites that are not to be developed upon further yet are at less risk of flooding than Site 3565 and have similar, if not better, outcomes in the Sustainability Appraisal Report.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	534	Consultee Dan Noutch Person ID: 1125418	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Core Policy 50 Developing on Site 3565 would be contrary to Core Policy 50 which states that “All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.” Developing on Site 3565 would be detrimental to the many animal species that live in and around Site 3565. As with many sites in Trowbridge, the hedgerows along streets such as Boundary Walk provide the perfect habitat for bats as well as many other animals. Bats are a protected species and Site 3565 is a part of the Bath and Bradford-on-Avon Bat SAC (Special Areas of Conservation). At the Ashton Park site within Trowbridge, it has been said that “Applications will be screened for potential impacts on the Bath and Bradford on Avon Bats SAC. Any appropriate assessment must conclude ‘no adverse effects’”. This approach should be taken for Site 3565 and the habitats of the birds, bats and other animals that inhabit the hedgerows and watercourse must be protected, conserved and enhanced. Many sites within Trowbridge have been deemed not to be developed upon due to there being Bechstein bats inhabiting trees and hedgerows. Is there any evidence to prove that the bats that live in hedgerows and trees around Site 3565 are the same rare bat species that have led other sites to not being considered for development?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	535	Consultee Sally Plank	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125430		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have lived in this area of Trowbridge for 23years now and I feel I have good grounds to object to the following proposal of new houses in this area of Trowbridge. My house although in Silver Meadows is side on to the Frome Road (A361), which is a main route out of Trowbridge. The building of houses off CHURCH LANE AND THE OPPOSITE FIELDS, will without doubt cause more noise and air pollution.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	536	Consultee Sally Plank	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125430		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I understand there is to be built a roundabout hereabouts to allow cars into the proposed new house builds. This will certainly slow the traffic flow as it is always congested at peak times mornings and evenings. As this will be very close to the entrance of Southwick Country Park and considering the Saturday run held there every week, traffic congests here due to the amount of runners who park on the main road due to the carpark being too small. There are around 150 - 200 runners there every week. They have been advised to park in the College. Lorries using this route into Trowbridge find it extremely difficult to pass the amount of parked cars, having to wait for a large enough suitable gap to get through.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	537	Consultee Sally Plank	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125430	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Can I also point out having lived in this area for many years that this area around Church Lane is prone to flooding and a regular intervals. I have seen the main Frome Road (A361) at Whiterow hill bridge flooded and virtually impassable. I'm sure we can all remember the summer of 2013, it never stopped raining for about 3 months. I feel building in Church lane and opposite fields will increase this risk.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	538	Consultee Sally Plank	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125430		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am also concerned on the proposal of building new houses on the fields behind Balmoral and Sandringham Road up to Woodmarsh Football pitch. These fields are low level and are prone again to flooding. So in effect building new houses there, you will be building on flood plain				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	539	Consultee Sally Plank	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125430		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>If these new proposed houses join onto Balmoral and Sandringham Roads, this will increase the volume of traffic that Silver Street Lane has to contend with. It had increased over the years now. With new houses will bring more families into the area. The local school, The Grove Primary school has already endured local residence complaining about traffic parked around school times. I know this as my son attended there!!!! The local residence have now put in an 'unofficial' one way system at school times. As most parents have cars these days to drop their children off and go to work, if they can't park near the school, they park a short distance away. This is now on Silver Street Lane.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	540	Consultee Sally Plank	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125430		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	Increased volume of traffic leading to air and noise pollution				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	541	Consultee Sally Plank	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125430		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As for the proposed houses for Whitehorse Business Park, again this will seriously cause congestion on an already busy route of Trowbridge. The Spitfire Retail Park cannot cope with the amount of cars, parking, coming in or leaving the Retail Park at weekends. The traffic can now be queued along Bradley Road and as far back as Newtown Trowbridge. It can gridlock!!! The traffic also queues out into the Whitehorse Business Park. At weekends now I avoid this area of town due to the sheer volume of traffic.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	542	Consultee Sally Plank	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125430		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Increased air pollution Increased noise pollution				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	543	Consultee Mrs Katharine Winfield Person ID: 1125455	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Document as a whole				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Many people living in our community think that:</p> <ol style="list-style-type: none"> 1. The Plan is not positively prepared because it does not meet objectively assessed development requirements. WC proposes to increase the size of Trowbridge by one quarter during the Plan period (and more after that) which exceeds the requirement for a five year supply. 2. The Plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion. 3. The Plan is not effective because WC's examination of 'windfall', which is expected to provide 60% of new housing, is grossly inadequate – comprising one page out of 4,500 pages of the Plan documents. 4. The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes <p>1. There seem to be several 'brownfield' sites in Trowbridge which would be ideal for housing but are standing idle and also creating a 'blot' on the landscape of the town. These could be developed to make the County Town more attractive.</p> <p>2. Where is the evidence that doctor's surgeries and schools etc. will not be crowded beyond capacity? Local services will not cope with such an influx of people requiring medical services, education, social services etc.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	544	Consultee Mrs Nicola Cook	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 899941		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H5.3 Clover Lane Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I support the inclusion of Site 3154 Piece Meadow, Durrington within the Wiltshire Site Allocations Plan. Inclusion within the plan means that this packet of land would no longer be a windfall site thus allowing efficient and effective use of the land for housing development. Development of Site 3154 with Site S98 and the adjacent land which is already subject to planning permission S/2006/1698 would allow for a holistic approach to any development plan for the three sites. In addition, vehicle, cycle and pedestrian access via the already existing Clover Lane network would logically provide links with the village and to open spaces and amenities. Development of the site should cause no major ecological or topographical impact and would fit well with the area strategy, linking in with the recently developed Avon Fields. Site 3154 and the land subject to planning permission S/2006/1698 are available and under single ownership. Site 3154 has been shown to be an available, achievable and deliverable site with moderate sustainability benefits and as such I support its adoption within the Wiltshire Housing Site Allocation Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	545	Consultee Mr Chris Joyce Person ID: 1125408	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective
Please identify the policy, paragraph, table, figure or site to which you are referring.	Figure: 5.18 H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocation Plan fails to adhere to the results of its own assessments. For example, site 321 scored negatively in 9 of the 12 (75%) criteria of the Stage 3 Sustainability Assessment, but the document concludes that the site is "more sustainable". I am questioning how this conclusion was drawn.</p> <p>Appendix F in the Wiltshire Council Site Allocation Plan contains the assessment criteria from Stage 3 of the site selection process, which is referred to as the Sustainability Appraisal. The Sustainability Appraisal assesses how suitable the area is for development against 12 subjective sustainability objectives. These objectives are qualitative objectives and are therefore down to the interpretation of the scorer.</p> <p>Scoring: Of the sustainability objectives, the site (321) on the B3098 scored negatively in 9 of the 12 (75%) categories. Of the three categories where site 321 did score positively, the scoring can be considered questionable in two categories, as below: Objective 12: Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce. Score: + Minor positive effect My response to objective 12: There is no evidence to reinforce this statement – building houses in a village does not create diverse employment opportunities. This should not score a positive response. Objective 8: Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures. Score: +++ Major positive effect. My response to objective 8: Any site will achieve a positive score, therefore removing its value when making comparisons. Every single site in Wiltshire Council's Sustainability Appraisal scores a positive score in this category, therefore completely removing its effectiveness. Looking at the evidence presented here, I question how it was concluded that the site was "more sustainable". The conclusion has completely ignored the results of the study. The plan would be acceptable if it developed conclusions that adhere to the results of its own assessments - not conclusions that ignore the results. It would be more sound if the results were not 'engineered' to conveniently find a site that could house 40 of the target 47 dwellings, as set out in the report. It would be more sound if the conclusions of the report reflected the results of the assessments carried out.</p>			
Attached files (Please see Objective)				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To give an opportunity to question the plans in person.			

Comment ID:	546	Consultee MR Geoff Turner Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Calne Without Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.23 SBR Studely and Derry Hill			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Calne Without Parish Council met on the 4th Sept and considered the Draft Wiltshire Housing Allocation Plan and voted unanimously to object to the settlement boundary for Derry Hill and Studley which it considers to be inconsistent. The council considered that the proposed revised settlement boundaries around the two main village areas of Derry Hill and Studley were broadly acceptable. However it considered the settlement boundary around the outlying group of houses on Old Road, Studley was inconsistent with other outlying housing and should be removed.</p> <p>Derry Hill and Studley has three outlying areas of housing on Devizes Road, Norley Lane and Old Road. North Wilts DC originally drew a settlement boundary around 21 houses on Old Road which were somewhat remote from the villages. Boundaries were not drawn around similar clusters of 15 houses on Devizes Road and 28 houses on Norley Lane, this is considered highly inconsistent. All three areas are very similar in that they are all small areas of linear housing, predominately along one side of roads leading to and from the villages. The Devizes Road housing is actually contiguous to Derry Hill, the Old Road housing is about 200m outside the nearest village boundary and the Norley Lane settlement about 350m from the Studley boundary</p> <p>The Parish Council believes that either all three areas should have settlement boundaries or preferably and more logically none of them should be within the settlement boundary as they are effectively in countryside outside the villages. The Old Road area should certainly not be extended across the A4 to include isolated and unrelated houses on the opposite side of this major road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	547	Consultee Miss Olivia Thomson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123977		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I believe the plan is unsound as the transport infrastructure has not been properly considered in any depth. The Netherampton Road cannot sustain any increase in traffic, let alone over 1000+ additional vehicles using it. The road cannot be widened due to existing developments and rivers. The location of sites H3.1 and H3.3 are not on any current bus routes meaning that more people will turn to using their cars. The plan needs to re-address the location of such a large proposed development to find somewhere that the current roads can have their capacity increased, infrastructure improved or a new location where such new infrastructure can be put in place.</p> <p>The addition of new developments will also have more of an affect on the environment that I feel has been considered in the plan. The large number of extra vehicles on the Netherhampton Road will produce a lot of harmful emissions to pedestrians, wildlife and the current ecosystems. The inevitable increased traffic jams will have running car engines queued up alongside dwellings, a school, businesses and pedestrians including children using the school emitting CO2 and other toxic fumes which have a negative impact. I believe the plan needs to consider this further.</p> <p>I also think that the plan does not consider the impact of construction traffic on the Netherhampton Road and the environment, wildlife and current residents and pedestrians in this area as outlined above. In addition to the increased traffic jams and exhaust fumes it will cause, the plan needs to consider the noise pollution it will create on current residents, businesses and pedestrians. The main road and surrounding access roads are not able to cope with large trucks, lorries and other construction traffic as the infrastructure is not in place and has not been considered. The plan needs to consider and address this.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	548	Consultee Miss Olivia Thomson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123977		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.25 H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I believe the plan is unsound as the transport infrastructure has not been properly considered in any depth. The Netherampton Road cannot sustain any increase in traffic, let alone over 1000+ additional vehicles using it. The road cannot be widened due to existing developments and rivers. The location of sites H3.1 and H3.3 are not on any current bus routes meaning that more people will turn to using their cars. The plan needs to re-address the location of such a large proposed development to find somewhere that the current roads can have their capacity increased, infrastructure improved or a new location where such new infrastructure can be put in place.</p> <p>The addition of new developments will also have more of an affect on the environment that I feel has been considered in the plan. The large number of extra vehicles on the Netherhampton Road will produce a lot of harmful emissions to pedestrians, wildlife and the current ecosystems. The inevitable increased traffic jams will have running car engines queued up alongside dwellings, a school, businesses and pedestrians including children using the school emitting CO2 and other toxic fumes which have a negative impact. I believe the plan needs to consider this further.</p> <p>I also think that the plan does not consider the impact of construction traffic on the Netherhampton Road and the environment, wildlife and current residents and pedestrians in this area as outlined above. In addition to the increased traffic jams and exhaust fumes it will cause, the plan needs to consider the noise pollution it will create on current residents, businesses and pedestrians. The main road and surrounding access roads are not able to cope with large trucks, lorries and other construction traffic as the infrastructure is not in place and has not been considered. The plan needs to consider and address this.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	549	Consultee D and G A'Bear	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124865	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Community Area Topic Paper-Chippenham Community Area: Yatton Keynell Revised Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Yatton Keynell is identified in the Wiltshire Core Strategy (WCS) as a sustainable "Large Village" in Core Policy 1 Settlement Strategy. The village has a very good range of community facilities and businesses. Yatton Keynell is assessed as suitable for some sustainable growth and at present does not have an advanced Neighbourhood Plan.</p> <p>It is proposed in the Settlement Boundary Review that the allocation of a single large site east of Farrells Farm will accommodate all the growth within Yatton Keynell for approximately 30 dwellings.</p> <p>The proposed Yatton Keynell village settlement boundary has elsewhere been drawn tightly around the existing built form and provides little opportunities for small scale future development. Almost all infilling has been taken up within the previous decade(s) within Yatton Keynell and there will be no small suitable and available housing sites within the Village up to 2026.</p> <p>The proposed development of one large site east of Farrells Farm will create a major visual impact at the beginning of the village and a reduction of landscape quality as well as a significant loss of countryside.</p> <p>A selection of smaller sites would be more in keeping with the village character and could be accommodated where they would have little adverse landscape impact.</p> <p>Expansion of the village by selection smaller sites including land opposite the existing built up area of Tiddleywink. Which has been proposed by the landowner under application 17/044648/OUT (Site Area document attached). This site is relatively contained site and well screened by vegetation with an existing access. The site which forms no agricultural purpose and already developed for parking and garaging.</p>			
Attached files (Please see Objective)		4706131			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	550	Consultee D and G A'Bear	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124865	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Whole Plan			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Draft Wiltshire Site Allocation Plan makes no provision for Self or Custom Build properties. The Council has a responsibility for keeping a self and custom housebuilding register as set out in Section 1 of the Self-build and Custom Housing Act 2015. The National Policy Planning Guidance (NPPG) states that this should form a key part of a relevant authority's evidence base of demand for this type of housing.</p> <p>There is no statement that this is allowed for the draft Plan. By implication self build or custom build for a group of dwellings are only likely to be delivered through small sites rather than a large housing site allocation. This will require some space within existing villages rather than a tightly drawn restrictive boundary.</p>				
Attached files (Please see Objective)	4706131				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	551	Consultee D and G A'Bear	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124865	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed development of one large site east of Farrells Farm will create a major visual impact at the beginning of the village and a reduction of landscape quality as well as a significant loss of countryside. A selection of smaller sites would be more in keeping with the village character and could be accommodated where they would have little adverse landscape impact.				
Attached files (Please see Objective)	4706131				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	552	Consultee Ms Teresa Nicholls	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125557		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Principal Settlement			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Although I agree that more housing is required due to the national housing shortage, why do we always have to look at green field sites. Around Trowbridge there are at least 2 sites that could have change of use and therefore be used for housing. The Bowyers site is an eyesore and surely could provide enough space for a reasonable amount of housing. Virgin's old building on White Horse Business Park could be demolished and used for housing. This building has been empty for at least 3 years and surely the land would be better used for housing than waiting for a potential tenant. At least the Council would receive some revenue through Council Tax as opposed to no revenue through Business Rates. Housing Association's should also play their part for providing housing for people in need. Why are they selling perfectly good 3 bedroomed homes rather than renting them to people on the housing list. Green Square is currently proposing to sell off houses in Heddington and I believe Compton Bassett. Surely this shouldn't be allowed. These are affordable rented homes which is what is needed as not everyone can afford to purchase 'affordable homes'. These affordable homes, can you guarantee they will go to people who intend to live in them and not to private landlords for the buy to let market.</p> <p>I really hope you take people's comments and concerns on board, as on previous experience I feel that when the Council makes up their mind to do something it doesn't really matter what the general public think.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	553	Consultee Miss Olivia Thomson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123977		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.25 H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The land is also subject to a large amount flooding as is the site of H3.1 to a slightly lesser degree. I feel this needs to be reassessed along with sewerage capacity and the river and water meadows which are currently part of the flood plain. Any new developments will affect these flood plains which are affected several times a year after heavy rain. The site of H3.1 is on a hill and flood water runs down off it onto the site of H.3.3 which floods across the current farm land. The water has nowhere else to go due to the location of the surrounding rivers and their contributories. I do not think that the plan has fully considered this and feel that the new developments would be subject to substantial flooding. I think that the plan could avoid this by finding an alternative location for such developments which is not on a flood plain.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	554	Consultee Miss Olivia Thomson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1123977		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The land is also liable to flooding as is the site of H3.3. I feel this needs to be reassessed along with sewerage capacity and the river and water meadows which are currently part of the flood plain. Any new developments will affect these flood plains.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	555	Consultee Mr Barry Cridland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125096		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Harnham - 840 New Houses		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have seen nothing to prove this - no evidence has been offered that justifies this. describe to those affected under which laws and statutes that you are proposing this.</p> <p>No traffic planning. The present infrastructure cannot cope with current levels. At present there is often a one mile tailback from the Harnham Gyratory along the Harnham and Netherhampton Roads. This must be addressed before adding to the problem.</p> <p>There is already a problem with the classification of the A3094, which is clearly not capable of being an A Road and is leading to great disruption for residents. This will be unnecessarily increased during construction and completion.</p> <p>Traffic measurement and management planning to be undertaken.</p> <p>Honest laying out of how much disruption will be caused, how long it will take and what compensation is offered.</p> <p>Details of increased bus services to serve the new build community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	You should listen to those affected, who pay the taxes to fund the developments and understand how we want our money spent.				

Comment ID:	556	Consultee Feltham Properties	Agent Mr Steven Smallman Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125376	Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Notwithstanding, and without prejudice to, the above [comment 519 and 520], the draft HSAP is not justified because the allocation of land at Fiddington Hill / Underhill Nursery to accommodate 50 dwellings is not the most appropriate strategy when considered against the reasonable alternative of allocating that site for significantly less dwellings (circa 20) and allocating Land at the Spring for 30 dwellings.</p> <p>Land at Fiddington Hill / Underhill Nursery is an illogical and unsuitable site to accommodate the amount of housing proposed, for the following reasons:</p> <p>The allocation of such a large site (relative to the size of the village) is contrary to the clearly expressed views of the Village. The Village Survey undertaken in the initial stages of preparing the emerging Neighbourhood Plan showed a strong resistance to the allocation of a large site on the grounds of social integration.</p> <p>The Site is relatively remote from the village centre and local services and amenities.</p> <p>It may be that a smaller scheme, restricted to the western corner of the site (the area currently occupied by glasshouses, hardstanding and car parking and an existing house) could be sensitively developed to address the substantial constraints identified above - although that has yet to be proven.</p> <p>Allocate Land at the Spring for “about 30 dwellings” and reduce the allocation of Underhill Nursery to “up to 20 dwellings”.</p>				
Attached files (Please see Objective)	4707551				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The omission of Land at The Spring, Market Lavington, raises substantial doubt about the soundness of the HSAP, because of serious deficiencies with the Site Selection Process, the relationship of the Plan with the emerging Neighbourhood Plan and the adequacy of the Plan's housing provision (as it relates to the Devizes Community Area).				

Comment ID:	557	Consultee Feltham Properties	Agent Mr Steven Smallman Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125376	Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Notwithstanding, and without prejudice to, the above [comment 519 and 520], the draft HSAP is not justified because the allocation of land at Fiddington Hill / Underhill Nursery to accommodate 50 dwellings is not the most appropriate strategy when considered against the reasonable alternative of allocating that site for significantly less dwellings (circa 20) and allocating Land at the Spring for 30 dwellings.</p> <p>Land at Fiddington Hill / Underhill Nursery is an illogical and unsuitable site to accommodate the amount of housing proposed, for the following reasons:</p> <p>The existing access to the site from Fiddington Hill is unsuitable to serve the amount of development proposed. This is a narrow rural lane that extends as a bridle way to provide an important recreational route to the Wessex Ridgeway and the Salisbury Plain SSSI / SPA. Road widening (even if that could be achieved) would result in the loss of a mature hedgerow (likely to be of ecological significance) and generally would have a serious adverse impact on the character and appearance of the area.</p> <p>There is local concern that development of this site would increase traffic congestion in the village centre.</p> <p>It may be that a smaller scheme, restricted to the western corner of the site (the area currently occupied by glasshouses, hardstanding and car parking and an existing house) could be sensitively developed to address the substantial constraints identified above - although that has yet to be proven.</p> <p>Allocate Land at the Spring for “about 30 dwellings” and reduce the allocation of Underhill Nursery to “up to 20 dwellings”.</p>			
Attached files (Please see Objective)		4707551			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The omission of Land at The Spring, Market Lavington, raises substantial doubt about the soundness of the HSAP, because of serious deficiencies with the Site Selection Process, the relationship of the Plan with the emerging Neighbourhood Plan and the adequacy of the Plan's housing provision (as it relates to the Devizes Community Area).			

Comment ID:	558	Consultee Feltham Properties	Agent Mr Steven Smallman Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125376	Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Notwithstanding, and without prejudice to, the above [comment 519 and 520], the draft HSAP is not justified because the allocation of land at Fiddington Hill / Underhill Nursery to accommodate 50 dwellings is not the most appropriate strategy when considered against the reasonable alternative of allocating that site for significantly less dwellings (circa 20) and allocating Land at the Spring for 30 dwellings.</p> <p>Land at Fiddington Hill / Underhill Nursery is an illogical and unsuitable site to accommodate the amount of housing proposed, for the following reasons:</p> <p>the SA confirms drainage issues related to surface water and sewer flooding events have been recorded in the area. Surface water attenuation measures could be problematic given the soil conditions and achieving a suitable drainage strategy could be problematic given the soil conditions.</p> <p>It may be that a smaller scheme, restricted to the western corner of the site (the area currently occupied by glasshouses, hardstanding and car parking and an existing house) could be sensitively developed to address the substantial constraints identified above - although that has yet to be proven.</p> <p>Allocate Land at the Spring for “about 30 dwellings” and reduce the allocation of Underhill Nursery to “up to 20 dwellings”.</p>			
Attached files (Please see Objective)		4707551			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The omission of Land at The Spring, Market Lavington, raises substantial doubt about the soundness of the HSAP, because of serious deficiencies with the Site Selection Process, the relationship of the Plan with the emerging Neighbourhood Plan and the adequacy of the Plan's housing provision (as it relates to the Devizes Community Area).			

Comment ID:	559	Consultee Feltham Properties	Agent Mr Steven Smallman Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125376	Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Notwithstanding, and without prejudice to, the above [comment 519 and 520], the draft HSAP is not justified because the allocation of land at Fiddington Hill / Underhill Nursery to accommodate 50 dwellings is not the most appropriate strategy when considered against the reasonable alternative of allocating that site for significantly less dwellings (circa 20) and allocating Land at the Spring for 30 dwellings. Land at Fiddington Hill / Underhill Nursery is an illogical and unsuitable site to accommodate the amount of housing proposed, for the following reasons:</p> <p>The site lies in an area of medium archaeological potential and an archaeological evaluation assessment would be required. It may be that a smaller scheme, restricted to the western corner of the site (the area currently occupied by glasshouses, hardstanding and car parking and an existing house) could be sensitively developed to address the substantial constraints identified above - although that has yet to be proven.</p> <p>Allocate Land at the Spring for “about 30 dwellings” and reduce the allocation of Underhill Nursery to “up to 20 dwellings”.</p>				
Attached files (Please see Objective)	4707551				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The omission of Land at The Spring, Market Lavington, raises substantial doubt about the soundness of the HSAP, because of serious deficiencies with the Site Selection Process, the relationship of the Plan with the emerging Neighbourhood Plan and the adequacy of the Plan's housing provision (as it relates to the Devizes Community Area).				

Comment ID:	560	Consultee Mrs J Woodd	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446465	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Para 5.128 and Policy H3.1 say that this development would depend on sufficient improvements being made to the transport network serving the development. This assumes that such improvements are possible. It is my opinion, from the position of someone living on Harnham Road, that until Wiltshire Council and the Highways Agency demonstrate that sufficient improvements can be made to make this scale of development viable, it cannot be said to be sound. The A3094 is already at capacity at peak times. Traffic is heavy throughout most weekdays. Adding up to 750 more households, perhaps 1500 additional cars, would provide an impossible burden. This would be exacerbated if a new school is built within this site, partly to absorb children from other parts of Salisbury, so further increasing the traffic load. There is already a major problem at the beginning and end of the school day with parents coming by car to the two Harnham Schools.</p> <p>These transport questions are important for four reasons:</p> <p>a) There is a major danger to health from ambulances being delayed (this being a major route for ambulances between Odstock Hospital and Wilton/South Wilts). EG severe delays have already been caused by the recent works on Harnham Bridge.</p> <p>b) The road is already very dangerous for cyclists. It would be essential for there to be separate provision for cyclists all the way from the roundabout at the end of New Harnham Road to the new development, if there were to be any chance of encouraging people to cycle rather than use their cars for local travel. (I know that there is some provision at each end, but this by itself is quite inadequate).</p> <p>c) However improved cycling provision must not be made at the expense of safety for pedestrians, as the footpaths are heavily used both by parents and children, and others. In fact there was a pedestrian fatality outside our house in Harnham Road just the other day. Given the width of the current road, and the position of the existing housing along Harnham and Netherhampton Roads, it must be for the Council to show how the needs of drivers, cyclists, pedestrians and bus passengers could be met within the existing road structure before development on this scale on this site could be considered sound.</p> <p>d) The economic cost and frustration caused by lengthy delays would be immense;</p> <p>In other words, I believe this plan has got things the wrong way round. 'The robust and comprehensive transport assessment' that is proposed once development proposals are put forward is too late. The Council and the Highways Agency need to undertake such an assessment now, based on existing traffic loads, so as to put in place a more viable long-term transport strategy, before housing allocation sites of this scale are considered. The pressure on Exeter Street going into the city, and on Southampton Road much of the time is already unacceptable.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	561	Consultee Mrs Suzanne Beaven	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125220		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Bratton 321 Court Orchard/Cassways			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure and Transport</p> <p>Buses are busy and infrequent at peak times with the route itself being one that Wiltshire Council themselves have already reduced subsidies for. Although gas and electricity are currently fit for purpose, telephone/broadband services are inadequate as they already are in rural areas. This development will be at the furthest point away from the Bratton telephone exchange and will dramatically affect the capacity/speeds for the surrounding properties. Water pressure is an existing issue for some villagers so any additional dwellings will add to the already overburdened services.</p> <p>With a development of 40 houses being proposed, this does flag a number of issues with the site, highway infrastructure and impact on local residents. Census data for 2011 shows that the average number of cars/vans per household sits at 1.3. This figure would indicate that an additional 52 vehicles would be brought into the village plus any visitors, etc. The road quality of the B3098 is already questionable throughout the village with subsiding edges of the pavement. The proposed turn off into the new development is at a pinch point within the width of the existing carriageway with no site lines towards the village for those wanting to exit the proposed development. Any entrance or exit would not meet the minimum standards for a clear envelope of visibility in accordance with the Highways Agency document TD41/95 based on the design speed of the road. The proposed development would also introduce noise pollution, air pollution and light pollution to the west of the village. Housing needs to be placed in an appropriate location with good transport links and job opportunities. The current draft proposal for Bratton 321 Court Orchard/Cassways largely relies on dwelling residents having access to private vehicles. The area to the south east of Trowbridge along West Ashton Road is currently registered for up to 2,500 dwellings, employment, two local centres, two schools, public open space and associated highway works.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	562	Consultee Mrs Suzanne Beaven	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125220		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Bratton 321 Court Orchard/Cassways			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Employment and Amenities</p> <p>There are little employment opportunities within the boundaries of the village as there are few employers outside of small scale agriculture, retail and hospitality businesses. There are few amenities within the village so there would be a necessity to commute daily to and from again adding to the stress on the underlying transport infrastructure.</p> <p>Housing needs to be placed in an appropriate location with good transport links and job opportunities. The current draft proposal for Bratton 321 Court Orchard/Cassways largely relies on dwelling residents having access to private vehicles. The area to the south east of Trowbridge along West Ashton Road is currently registered for up to 2,500 dwellings, employment, two local centres, two schools, public open space and associated highway works.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	563	Consultee Ms Caroline Toomey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125255		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5. Housing Site Allocataions H2 14, Figure 5.18			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>The development would have an adverse impact on local amenities Consider multiple alternative sites away from the B3098, particularly where infill is possible Reduce the allocation of houses The increased volume of traffic on the B3098 resulting from the large volume of houses concentrated in such a small area will mean more delays, more accidents, a greater volume of traffic through and round the village and an increased need for ongoing repairs to the already worn road surface. People who live on the main road already endure a constant stream of traffic through the day, with the accompanying noise and pollution. This will be made worse by the increased number of houses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	564	Consultee Ms Caroline Toomey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125255		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5. Housing Site Allocataions H2 14, Figure 5.18		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>The development would have a detrimental impact on already over burdened infrastructure Consider multiple alternative sites away from the B3098, particularly where infill is possible Reduce the allocation of houses The increased volume of traffic on the B3098 resulting from the large volume of houses concentrated in such a small area will mean more delays, more accidents, a greater volume of traffic through and round the village and an increased need for ongoing repairs to the already worn road surface. People who live on the main road already endure a constant stream of traffic through the day, with the accompanying noise and pollution. This will be made worse by the increased number of houses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	565	Consultee Ms Caroline Toomey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125255		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5. Housing Site Allocataions H2 14, Figure 5.18			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There are alternative sites within the existing settlement boundary that could provide the potential for development to meet local need within the settlement boundary</p> <p>Consider multiple alternative sites away from the B3098, particularly where infill is possible</p> <p>Reduce the allocation of houses</p> <p>The increased volume of traffic on the B3098 resulting from the large volume of houses concentrated in such a small area will mean more delays, more accidents, a greater volume of traffic through and round the village and an increased need for ongoing repairs to the already worn road surface. People who live on the main road already endure a constant stream of traffic through the day, with the accompanying noise and pollution. This will be made worse by the increased number of houses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	566	Consultee Ms Caroline Toomey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125255		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5. Housing Site Allocataions H2 14, Figure 5.18		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>The increase in residents would represent an unmanageable increase in traffic and create significant highway issues</p> <p>Consider multiple alternative sites away from the B3098, particularly where infill is possible</p> <p>Reduce the allocation of houses</p> <p>The increased volume of traffic on the B3098 resulting from the large volume of houses concentrated in such a small area will mean more delays, more accidents, a greater volume of traffic through and round the village and an increased need for ongoing repairs to the already worn road surface. People who live on the main road already endure a constant stream of traffic through the day, with the accompanying noise and pollution. This will be made worse by the increased number of houses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	567	Consultee Dawn Wilson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125575		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Please direct this email to the relevant person/s regarding the development plans for hundreds of houses off Netherhampton Road. As a resident of Harnham, I am already highly concerned with the volume of traffic on roads in Harnham. They are frequently at a stand still, regardless to the work being under taken on New Bridge Road and there are limited options to bypass any traffic jams or road closures here or on Netherhampton Road. In addition traffic jams are often seen along Coombe Road. What needs to happen is another bridge over the river needs to be build before any additional housing as the roads in and around Salisbury can not take any additional traffic, they are at bursting point. Has an analysis on the traffic been undertaken?</p> <p>Furthermore, I am not in favour of building on green belt land. I believe there are many unique animals that live in this area. I often see red-legged partridges, Mistle thrush and long-tailed tits on Harnham Hill. Has a report been done on the impact this development will have on the local wildlife?</p> <p>I look forward to hearing from you,</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	568	Consultee Mrs J Woodd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446465		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Para 5.128 and Policy H3.1 say that this development would depend on sufficient improvements being made to the transport network serving the development. This assumes that such improvements are possible. It is my opinion, from the position of someone living on Harnham Road, that until Wiltshire Council and the Highways Agency demonstrate that sufficient improvements can be made to make this scale of development viable, it cannot be said to be sound. The A3094 is already at capacity at peak times. Traffic is heavy throughout most weekdays. Adding up to 750 more households, perhaps 1500 additional cars, would provide an impossible burden. This would be exacerbated if a new school is built within this site, partly to absorb children from other parts of Salisbury, so further increasing the traffic load. There is already a major problem at the beginning and end of the school day with parents coming by car to the two Harnham Schools.</p> <p>These transport questions are important for four reasons:</p> <p>a) There is a major danger to health from ambulances being delayed (this being a major route for ambulances between Odstock Hospital and Wilton/South Wilts). EG severe delays have already been caused by the recent works on Harnham Bridge.</p> <p>b) The road is already very dangerous for cyclists. It would be essential for there to be separate provision for cyclists all the way from the roundabout at the end of New Harnham Road to the new development, if there were to be any chance of encouraging people to cycle rather than use their cars for local travel. (I know that there is some provision at each end, but this by itself is quite inadequate).</p> <p>c) However improved cycling provision must not be made at the expense of safety for pedestrians, as the footpaths are heavily used both by parents and children, and others. In fact there was a pedestrian fatality outside our house in Harnham Road just the other day. Given the width of the current road, and the position of the existing housing along Harnham and Netherhampton Roads, it must be for the Council to show how the needs of drivers, cyclists, pedestrians and bus passengers could be met within the existing road structure before development on this scale could be considered sound.</p> <p>d) The economic cost and frustration caused by lengthy delays would be immense;</p> <p>In other words, I believe this plan has got things the wrong way round. 'The robust and comprehensive transport assessment' that is proposed once development proposals are put forward is too late. The Council and the Highways Agency need to undertake such an assessment now, based on existing traffic loads, so as to put in place a more viable long-term transport strategy, before housing allocation sites of this scale are considered. The pressure on Exeter Street going into the city, and on Southampton Road much of the time is already unacceptable.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	569	Consultee Mrs Cathryn Hanny	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125262		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Why does North Bradley have to take the brunt of the housing need in this area? There is plenty of places around the county that are better suited to housing developments - not to mention the brown sites in Trowbridge itself which would be much better being built on. This proposal means people will lose money on their properties as they will no longer be in a village and be left living on an even busier road than they already do, without any offers of help.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	570	Consultee Mrs J Woodd	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446465	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Regarding H3.3, I believe the proposals underestimate the potential flood risk on this site (which is evident to passers by in the winter). If there is a major risk of flooding on the site, surely it is not a suitable site for development?			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	571	Consultee Mrs J Woodd	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446465	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I also believe this site allocation is not justified, compared to the proposal already mooted for relocating the Churchfields industrial sites, and developing that area for housing. Such a development would provide housing near the city centre (and the Water Meadows), and particularly the station, thus much reducing car use in favour of cycling, walking and bus travel. Why is priority not being given to expediting that plan?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	572	Consultee Mr Simon Hunt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1117600		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 1021 Church Lane		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Paragraph 5.69 says that development will need to enhance the urban edge of town and the character of Southwick Country Park. This will not be achieved by building houses on land which currently provides a habitat for deer to rear their young. The Church Lane site is an ancient water meadow (see national policy paragraphs 129 and 132, English Heritage and the National Monuments Record) and will not be enhanced by covering it in concrete. This plan should acknowledge that building houses on this site will negatively affect the character of Southwick Country Park. The review document "Wiltshire Housing Site Allocations Plan" prepared by Atkins assessed this site as being the most detrimental when compared to other sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	573	Consultee Mr Simon Hunt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1117600		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 1021 Church Lane		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		There is no mention of this site being located on a floodplain. This area is on clay soil and the water table is close to the surface. The number of houses will be restricted by this problem but it is likely that the access road will have to cut across the land which floods. This will further increase flooding in the Country Park.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	574	Consultee Mr Simon Hunt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1117600		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 1021 Church Lane		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Paragraph 5.68 says that access will be provided by a new junction off the A361. This section of road has had many accidents. The proposed development will increase the number of vehicles on this road and the plan seems to ignore the 2026 Trowbridge Traffic Model (PFA Consulting).			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	575	Consultee Robert Niblett Planning Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Gloucestershire County Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Malmesbury Community Area Remainder site - Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Thank you for consulting Gloucestershire County Council (GCC) on the above matter. I have the following officer comments to make.</p> <p>I note that the Malmesbury housing allocations at the villages of Oaksey and Crudwell come close to the Gloucestershire border. If development is designed well here with green open space, retention of trees/hedgerows then an adverse significant impact on biodiversity and in particular the Cotswold Water Park and North Meadow & Clattinger SAC is unlikely. I am therefore in agreement with the SA (Biodiversity theme) and the HRA conclusions.</p> <p>If you would like to discuss any of the points raised above please do not hesitate to contact me. Please ignore my earlier response.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	576	Consultee MR David BULLOCK Person ID: 1125261	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.115 to 5.121		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Other land parcels in Bratton have not been considered. Remove allocation as shown in Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton Alternative location should be considered outside of the Special Landscape Area Large Villages = Development limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities. There is no justifiable need for this development in Bratton, it contravenes policy by adding a burden on existing services and facilities, provides no contribution to the community. Therefore the plan is unsound in considering this site is suitable for 40 dwellings. Removal of the allocation of housing for plot shown Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	577	Consultee MR David BULLOCK	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125261		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.115 to 5.121		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The parcel identified is in a special landscape area and inappropriate for development for a number of issues, including flooding, transport and infrastructure, road safety, landscape and setting</p> <p>Remove allocation as shown in Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton Alternative location should be considered outside of the Special Landscape Area Removal of the allocation of housing for plot shown Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton The area identified is inappropriate to allocate 40 dwellings given that it lies in a Special Landscape Area and is not in keeping with the setting with the area. The infrastructure requirements and potential road safety issues associated with access on to the B3098 make this proposal for 40 dwellings unsustainable and presents a potential accident risk.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	578	Consultee MR David BULLOCK Person ID: 1125261	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	5.115 to 5.121				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Remove allocation as shown in Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton The assessment of access using the B3098 presents a road safety risk, considerable infrastructure improvements would be required to enable the site to be accessed and the land remaining would be unable to provide the number of houses in the allocation. Therefore the plan is unsound in considering this site is suitable for 40 dwellings. Removal of the allocation of housing for plot shown Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton This proposal would increase 'outcommuting' as the village provides inadequate employment opportunities - therefore is unsustainable				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	579	Consultee MR David BULLOCK	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125261		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.115 to 5.121		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Remove allocation as shown in Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton			
Attached files (Please see Objective)		The site has a high potential for flooding from surface water. Sustainable drainage would need to be provided within the site, limiting the area for development and number of houses. The site is inappropriate for the allocation given the infrastructure required to serve access and drainage. Therefore the plan is unsound in considering this site is suitable for 40 dwellings.			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	580	Consultee MR David BULLOCK	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125261		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.115 to 5.121		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Remove allocation as shown in Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton			Effective
Attached files (Please see Objective)		Removal of the allocation of housing for plot shown Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton			Consistent with national policy
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Other options for the allocation of 40 dwelling should considered. 1. The allocation should be within Westbury, where adequate facilities, employment and transport is easily provided.			

Comment ID:	581	Consultee MR David BULLOCK	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125261	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.115 to 5.121		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Remove allocation as shown in Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton</p> <p>Removal of the allocation of housing for plot shown Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton</p> <p>Other options for the allocation of 40 dwelling should considered.</p> <p>2. Alternative locations should be sought in Bratton, where safety, access and drainage issues can be overcome. In particular areas outside the Special Landscape Area, that do not interfere with the PROW network and have a reduced impact on the landscape and setting of the village.</p> <p>3. Locations north of Bratton on Trowbridge Road, between existing housing and the community facilities should be investigated as a more appropriate location.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	582	Consultee Mr J Knott	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125429	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is no GP Surgery in North Bradley or dentists. The only Primary School in North Bradley is small and like most of the schools surrounding is full. There is no secondary school in North Bradley.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	583	Consultee Mr P Wrenn Save Calne Marsh Group	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 393636	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Infrastructure in Calne			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst appreciating that most of this is being imposed on you by central government, we feel that builders are being allowed to exploit the situation and suspect you have run out of public money to fight the Appeals. You are looking after a beautiful county. A lot of people come on holiday to Wiltshire, and the beauty of the county must not be destroyed with ill-considered housing - for the sake of it. Your consultation sessions are welcomed but the window was way too tight fort hose at work.</p> <p>1. The current boundaries should remain the same to ensure more housing cannot be exploited through boundary changes.</p> <p>2. We understand that builders must put money to aid the existing local community. (Section 106). This money should be allocated and should factor infrastructure. We know of at least new three housing estates being built of less than 300 houses, which in total will overload current roads. The people making the most profit from the houses should upgrade all the roads in the area.</p> <p>3. Can Wiltshire Council PLEASE remove the traffic lights from the Town Hall in Calne and replace them with a roundabout which was on the original plan. Use Section 106 money from Calne new housing to pay for this. Traffic backs up badly in Calne at rush hour as the traffic lights work against the pelican crossing and the interaction of the A4/A3102. This infrastructure issue will only get worse as new houses are built.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	584	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Extremely rare post-medieval earthworks will be destroyed (earthworks which have already suffered damage from ill-informed exploratory work). The field system and managed landscape associated with a grade two listed building will be destroyed. Access can only be from the A361 directly past the grade two star listed building.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	585	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Access can only be from the A361 directly past the grade two star listed building. Public access to land which has been used as a public resource with the support of the landowner and on which residents have had their ashes scattered for a minimum of 40 years will be removed. Location in relation to the current built form will create unacceptable peril for existing and incoming residents.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	586	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Poorly informed exploratory work will inevitably lead to erroneous data in support of the application.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	587	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Short and medium term economic impacts will render the entire managed field system derelict.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	588	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Public services and access to significant public transport hubs are out of specified range of this development. Traffic and education will be specifically impacted.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	589	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Procedural anomalies relating to the process itself are rife. The indications being that this parcel of land has been added in a rushed manner to the Proposal without due diligence on its suitability having been performed. Furthermore all attempts to activate the commitments made by Councillors by County Officers have been met with negativity and inaction.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	590	Consultee mr blair blair keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1121943		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>There is no active support for this site from either, Local Council, Environment Agency, Natural England, Historic England or the County Planning Archaeologist despite such active support being voiced for other sites within the Proposal. In fact in a response from Natural England the case officer said :</p> <p>“I have briefly looked at the conclusions/recommendations in the Trowbridge Community Area Topic Paper and have noted that Site 3565 (Land east of the A361 at Southwick Court), is considered to be a less sustainable options for development, and that five moderate adverse effects have been identified in relation to this site.”</p> <p>As NPPF demands:</p> <p>“If a planning application fails to score positively against the aims and objectives of the Local Plan Sustainability Appraisal or Local Plan policies..... planning permission should be refused.”</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	591	Consultee Dr Ken Taylor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124364		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.3 at Netherhampton on the A3094		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not proven feasible by integrated planning for jobs, housing and mobility. Carry out appropriate holistic planning - see below after question: "Please set out what change(s) you consider necessary to make the draft Wiltshire Housing Site Allocations Plan sound". Comments seen as a resident of Quidhampton. Flooding Runoff will increase in the floodplains and valley catchment between Quidhampton and Netherhampton and Salisbury. These developments would increase flood levels and risks. There are low lying properties in the whole valley down into to Salisbury and up to Quidhampton that could be more significantly at risk given the current flood predictions of the Environment Agency.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	592	Consultee Dr Ken Taylor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124364		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 at Netherhampton on the A3094			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not proven feasible by integrated planning for jobs, housing and mobility. Carry out appropriate holistic planning - see below after question: "Please set out what change(s) you consider necessary to make the draft Wiltshire Housing Site Allocations Plan sound". Comments seen as a resident of Quidhampton. Other Infrastructure Schools, GP practices, availability of supermarkets: if these needs are not met with new local provision they will necessitate even more journeys (and short cuts through Quidhampton) to facilities in Salisbury, its outskirts and beyond.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To give the public opportunity to directly express their support or describe concerns.				

Comment ID:	593	Consultee Dr Ken Taylor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124364		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 at Netherhampton on the A3094			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not proven feasible by integrated planning for jobs, housing and mobility. Carry out appropriate holistic planning - see below after question: "Please set out what change(s) you consider necessary to make the draft Wiltshire Housing Site Allocations Plan sound". Comments seen as a resident of Quidhampton. In addition: the proposed site is a greenfield site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To give the public opportunity to directly express their support or describe concerns.				

Comment ID:	594	Consultee Dr Ken Taylor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124364		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 at Netherhampton on the A3094			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not proven feasible by integrated planning for jobs, housing and mobility. Carry out appropriate holistic planning - see below after question: "Please set out what change(s) you consider necessary to make the draft Wiltshire Housing Site Allocations Plan sound". Comments seen as a resident of Quidhampton. Flooding Runoff will increase in the floodplains and valley catchment between Quidhampton and Netherhampton and Salisbury. These developments would increase flood levels and risks. There are low lying properties in the whole valley down into to Salisbury and up to Quidhampton that could be more significantly at risk given the current flood predictions of the Environment Agency.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	595	Consultee Dr Ken Taylor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124364		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 at Netherhampton on the A3094			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not proven feasible by integrated planning for jobs, housing and mobility. Carry out appropriate holistic planning - see below after question: "Please set out what change(s) you consider necessary to make the draft Wiltshire Housing Site Allocations Plan sound". Comments seen as a resident of Quidhampton. Other Infrastructure Schools, GP practices, availability of supermarkets: if these needs are not met with new local provision they will necessitate even more journeys (and short cuts through Quidhampton) to facilities in Salisbury, its outskirts and beyond.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To give the public opportunity to directly express their support or describe concerns.				

Comment ID:	596	Consultee Dr Ken Taylor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124364		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.3 at Netherhampton on the A3094			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not proven feasible by integrated planning for jobs, housing and mobility. Carry out appropriate holistic planning - see below after question: "Please set out what change(s) you consider necessary to make the draft Wiltshire Housing Site Allocations Plan sound". Comments seen as a resident of Quidhampton. In addition: the proposed site is a greenfield site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To give the public opportunity to directly express their support or describe concerns.				

Comment ID:	597	Consultee Mr Hector Pilkington	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125594		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Land at Netherhampton Rd, Land north of Netherhampton Rd			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to object strongly to the proposed developments in Harnham. The Netherhampton road is already extremely busy, carrying not only local traffic but heavy vehicles trying to avoid the jammed Salisbury ring road. The Harnham gyratory is already infamous. Another 740 homes will create a permanent gridlock.</p> <p>I have personal experience of the busy Netherhampton road. It is not possible to widen it. Please cancel these developments. Are they at all necessary? Where will all these families find work?!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	598	Consultee Mr Neville BURNE Person ID: 894625	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.37				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Representations were made to Wiltshire Council's 'Spatial Planning' section and the Sherston Parish Council in 2015, pointing out that the boundary on the southern outskirts of Sherston village on the then current proposed Neighbourhood Plan, was drawn tightly along the rear of houses in Grove Road excluding the rear gardens of these properties, which were located some 140 yards to the north of No. 15 Thompsons Hill.</p> <p>It was pointed out that the exclusion of land at the rear of these properties (which could be any property, but with particular reference to Grove Road) was not consistent with the ownership or definition of that property, which should comprise the entire curtilages.</p> <p>Additionally the position of this line tight on the building did not accord with Wiltshire Council's planning requirements which stated that: "where practical the draft settlement boundaries follow clearly defined physical features, such as, walls, fences, hedgerows, roads and water courses in order to define the built area of the settlement".</p> <p>It was also pointed out that the 2015 plan line also excluded residential houses in Tanners Hill, Thompsons Hill, and Hustlers Hill, some 28 residences, most of which are part of the original settlement of Sherston.</p> <p>Part of the representation was heeded and the present proposed plan has been drawn up to include at least some of the properties indicated in para 4, but inexplicably the new boundary has been drawn across the lawn of the garden of 15 Thompsons Hill on a line having no regard to any physical feature or boundary.</p> <p>It is submitted that by drawing this line in the proposed position it is (a) disregarding Wiltshire Council's own guidelines (see para 7.7 of the Draft) quote ".....Therefore, the revised settlement boundary review methodology will make it clear that the settlement boundary will follow but not include clearly defined physical features." (b) disregarding the accepted definition of curtilage i.e. land encompassing a building,, (c) thereby excluding buildings which are listed and forming part of the curtilage.</p> <p>The curtilage of 15 Thompsons Hill includes the whole of the garden as shown on the attached plan by yellow colouring. The property, which includes the garden, is assessed for Council Tax purposes on the purchase price of the whole property included within the curtilage. It is iniquitous that Wiltshire Council arbitrarily and inaccurately redefines the extent of the property to suit its whim.</p> <p>Having regard to para 7.20. of the Draft, a revised and again arbitrary definition, i.e., Conclusion. Quote: ".....Therefore the revised settlement boundary review methodology will include the curtilage of a property that relates more closely to the built environment, e.g. a garden, or has limited capacity to extend the built form of the settlement in terms of scale and location. However, it will exclude the curtilage of a property that relates more closely to the open countryside, e.g. a field or paddock, or has the capacity to substantially extend the built form of the settlement in terms of scale and location".</p> <p>The garden of No.15 is not related to the open countryside, as there are some 9 residential properties extending 200 yards further to the south on the same road, extraordinarily not included in the Neighbourhood area, is not a field or paddock and is set virtually in a gully or valley, and clearly part of the village of Sherston.</p>				

	It is submitted that to accord with the common and legal understanding of 'curtilage' the Neighbourhood boundary line , certainly in so far as No 15 is concerned, should be located around the curtilage of No.15 as shown by a dotted red line on the attached plan.
Attached files (Please see Objective)	4709096
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I consider that my representation is self-explanatory and straightforward and unnecessary to attend an oral presentation, however, I would be pleased to attend should the Inspector deem it necessary.

Comment ID:	599	Consultee Mrs Anne Henshaw Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		CPRE Campaign to Protect Rural England Wiltshire		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Joining North and West Wiltshire HMA results in an inappropriate and extremely large market area with enormous differences. It has created a negative effect due to some areas in the HMA failing to deliver sites which then have repercussions on areas that have more housing forced on them by default through the 5 year land supply requirement. To put Warminster in the same social, economic or environmental category as Malmesbury or Calne is wrong. The result is an ineffective HMA, and site allocation s, since the numbers are constantly challenged in areas whose quotas are met and then exceeded by invocation of the NPPF.</p> <p>There were at one time two separate HMAs – under the former council areas – North and West.</p> <p>This was fair, balanced and equitable.</p> <p>[Officer correction: The form states that this representation relates to Table 1. It is assumed the comment relates to Figure 2.1]</p> <p>Return to separation of North and West Wiltshire Areas</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Unless Wiltshire Council can give justification for continuing the present arrangements, we would put the case to the inspector.				

Comment ID:	600	Consultee Mrs Anne Henshaw Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		CPRE Campaign to Protect Rural England Wiltshire		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This table demonstrates the imbalance of the huge HMA. This area shows commitment in urban areas of 11,871 in contrast to South Wilts with 5,142. It will only take Melksham, Trowbridge or Warminster to under deliver for the towns of Corsham, Calne and Bradford to suffer. Housing in the very large centre, Chippenham, with as yet unknown delivery patterns is the limit for what the urban areas in North Wiltshire should be subjected to and affected by.</p> <p>[Officer correction: The submitted form states that this representation relates to Table 4.10. It is thought that the comment relates to either Table 4.1 of the Draft Wiltshire Housing Site Allocations Plan, or Table 4.2 of the WHSA Pre-submission draft Topic Paper 3 - Housing Land Supply.]</p> <p>Return to the two separate HMAs, North Wiltshire and West Wiltshire.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To Argue the justification				

Comment ID:	601	Consultee Mrs Anne Henshaw Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		CPRE Campaign to Protect Rural England Wiltshire Person ID: 399075		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.22			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The proposal for the revised settlement boundary in Calne makes no sense at H/4-6. Grids 4, 5 and 6 all contain permitted developments, some already started.</p> <p>Not to continue the amended boundary at 6/7 to include these makes no sense.</p> <p>If the intention is to reiterate the basic role of the settlement boundary – to define the built edge – then this map fails.</p> <p>The boundary review fails to properly recognise reality on the ground.</p> <p>Constantly reviewing boundaries is unsettling to residents and poor for forward planning when deciding what is unacceptable.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To emphasise why the map is wrong.			

Comment ID:	602	Consultee Mrs Malgosia Odell Person ID: 1125612	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		all		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by one quarter during the Plan period (and more after that) which exceeds the requirement for a five year supply.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	603	Consultee Mrs Gill Jackson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123046	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.136			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	Para 5.136 There is no detail about how the already overloaded and inadequate infrastructure will cope. The gyratory system is unable to take increased traffic. The plan is lacks essential detail of essential heavily increased traffic management. An extensive road traffic review and subsequent plan needs to be put in place, along with full costings and implications in order to prove this is viable. Without a proper proven road traffic plan the proposal is not viable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	604	Consultee Mrs Liz Starling Worton Parish Council	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 785423		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure A.6 Proposed amendments to the settlement boundary for Worton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With reference to the Proposed amendments to the settlement boundary of our village, as detailed on the Wiltshire website. As a parish council we are concerned by a number of aspects of the proposed changes. Having consulted our county councillor, Richard Gamble, with regard to the proposed changes, we are given to understand that those members of our community whose properties would be affected by the proposed changes have not been or consulted individually and may well be unaware of the implications of how the proposed changes to could affect them. We have attempted to draw the attention of the community to the nature of the proposed changes but are far from satisfied that this has been successful.</p> <p>We also understand that no on-site assessments and judgments have been made. The result is a complex picture which seems both illogical and careless. As a Parish Council, it is a very difficult task to consult /inform on a property by property basis. Indeed we feel that this is not within our remit and could, indeed, give rise to justified complaint if this took place on a piece meal basis.</p> <p>We would respectfully suggest that any changes are deferred until those directly impacted on have been properly informed. As this has not taken place so far, we must take the view that no changes should take place and the status quo be maintained and any proposal should be re-submitted after a more satisfactory attempt has been made to communicate with those most affected.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Worton Parish Council wish to ensure that any changes are deferred until those directly impacted on have been properly informed. We wish to ensure that a more satisfactory attempt has been made to communicate with those most affected.				

Comment ID:	605	Consultee Brian Grindley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125621		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off the A363 at White Horse Business Park		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>1. Because the flooding of the fields in Woodmarsh makes it unsuitable for housing. Example: problems with drainage on football field opposite.</p> <p>2. The boundary between North Bradley and Trowbridge would be lost FOREVER.</p> <p>3. The traffic in Woodmarsh and access to fields does not seem to be taken into consideration.</p> <p>Because the site floods as mentioned the fields are unsuitable for housing. The boundaries between North Bradley and Trowbridge should be kept. The roundabout at Spitfire Park is not suitable for the amount of traffic now as the retail park and White Horse Business Park generate an enormous amount of traffic.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	606	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Draft Wiltshire Housing Site Allocations Plan References: http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap Salisbury Transport Strategy for Wiltshire Council by Atkins August 2011 Reference A relates to the proposal to build 640 new homes along south side of Netherhampton Road, Salisbury, and 100 houses on the north side, and seeks comments by 22 September 2017. I am a resident of Harnham and seek to lodge my objection to this proposal due to the following reasons.</p> <ol style="list-style-type: none"> Current roads at maximum capacity My house is on the Harnham Road within 100m of the traffic lights with Saxon Road. Traffic backs up my house from the Harnham Gyratory Roundabout (some 750m to the east) every morning from 08:00 -09:15 hours. This causes noise and pollution so that I have to keep all my road facing windows shut. This traffic situation is compounded when children are delivered and collected from the Harnham Primary School and Harnham Infants Schools at the end of Hollows Close which is opposite my house. The traffic capacity of the road from the Harnham Road into Salisbury is already at maximum capacity (as reported in Reference B) and this was cited as a reason to reject the recent proposed development of the Britford Meadows (North of Britford Road (East)). There were plans for a relief road or even a by-pass reflecting the existing traffic congestion in Salisbury. However, these plans were shelved when the 'park-and-ride' sites were set up. These were designed to support shoppers and visitors from outside Salisbury. New houses should therefore be located close to or outside these sites. There are a number of elderly residents between Hollows Close and the Harnham Gyratory including the Salisbury City Almshouses and Welfare Charity site and the BUPA residential home opposite. This will only increase the likelihood of accident and death. Sadly, there was a death of a pedestrian outside my house on 15 August 2017. As well as the impact of the traffic of the new residents there will be the added problems caused by the heavy vehicles during the construction period. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	607	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Draft Wiltshire Housing Site Allocations Plan References: http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap Salisbury Transport Strategy for Wiltshire Council by Atkins August 2011 Reference A relates to the proposal to build 640 new homes along south side of Netherhampton Road, Salisbury, and 100 houses on the north side, and seeks comments by 22 September 2017. I am a resident of Harnham and seek to lodge my objection to this proposal due to the following reasons.</p> <ol style="list-style-type: none"> Current roads at maximum capacity My house is on the Harnham Road within 100m of the traffic lights with Saxon Road. Traffic backs up my house from the Harnham Gyratory Roundabout (some 750m to the east) every morning from 08:00 -09:15 hours. This causes noise and pollution so that I have to keep all my road facing windows shut. This traffic situation is compounded when children are delivered and collected from the Harnham Primary School and Harnham Infants Schools at the end of Hollows Close which is opposite my house. The traffic capacity of the road from the Harnham Road into Salisbury is already at maximum capacity (as reported in Reference B) and this was cited as a reason to reject the recent proposed development of the Britford Meadows (North of Britford Road (East)). There were plans for a relief road or even a by-pass reflecting the existing traffic congestion in Salisbury. However, these plans were shelved when the 'park-and-ride' sites were set up. These were designed to support shoppers and visitors from outside Salisbury. New houses should therefore be located close to or outside these sites. There are a number of elderly residents between Hollows Close and the Harnham Gyratory including the Salisbury City Almshouses and Welfare Charity site and the BUPA residential home opposite. This will only increase the likelihood of accident and death. Sadly, there was a death of a pedestrian outside my house on 15 August 2017. As well as the impact of the traffic of the new residents there will be the added problems caused by the heavy vehicles during the construction period. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	608	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Lack of Infrastructure. There is no new infrastructure being proposed such as shops resulting in all residents having to drive along the Netherhampton/Harnham Road to shop in Salisbury city centre or in the retail outlets on the Southampton Road, adding to existing congestion (as report in Reference B).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	609	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am a resident of Harnham and seek to lodge my objection to this proposal due to the following reasons. My house is on the Harnham Road within 100m of the traffic lights with Saxon Road. Traffic backs up my house from the Harnham Gyatory Roundabout (some 750m to the east) every morning from 08:00 -09:15 hours. This causes noise and pollution so that I have to keep all my road facing windows shut. As well as the impact of the traffic of the new residents there will be the added problems caused by the heavy vehicles during the construction period. No mitigation plans for Harnham Road Residents. There are no plans to mitigate the disruption to residents of Harnham, especially those who live on the Netherhampton Road and the Harnham Road. Solutions could include laying low noise road surface, insert traffic calming measures to force drivers to keep to the speed limit and providing triple window glazing to those living along these roads.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	610	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is no significant new employment on the west side of Salisbury. Housing should be built close to the centres of employment.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	611	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Given the need for 'affordable housing' for the current population, there are no guarantees from the developer to cater for this. Other recent housing developments would indicate that building 'executive' housing provides a greater profit for the developers, without benefit to local residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	612	Consultee James F Prain	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Environmental Suitability. The site on the north side of the Netherhampton Road is subject to flooding. I have seen this on several occasions since 2011 when I moved into my current house.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	613	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Draft Wiltshire Housing Site Allocations Plan References: http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap Salisbury Transport Strategy for Wiltshire Council by Atkins August 2011 Reference A relates to the proposal to build 640 new homes along south side of Netherhampton Road, Salisbury, and 100 houses on the north side, and seeks comments by 22 September 2017. I am a resident of Harnham and seek to lodge my objection to this proposal due to the following reasons.</p> <ol style="list-style-type: none"> Current roads at maximum capacity My house is on the Harnham Road within 100m of the traffic lights with Saxon Road. Traffic backs up my house from the Harnham Gyratory Roundabout (some 750m to the east) every morning from 08:00 -09:15 hours. This causes noise and pollution so that I have to keep all my road facing windows shut. This traffic situation is compounded when children are delivered and collected from the Harnham Primary School and Harnham Infants Schools at the end of Hollows Close which is opposite my house. The traffic capacity of the road from the Harnham Road into Salisbury is already at maximum capacity (as reported in Reference B) and this was cited as a reason to reject the recent proposed development of the Britford Meadows (North of Britford Road (East)). There were plans for a relief road or even a by-pass reflecting the existing traffic congestion in Salisbury. However, these plans were shelved when the 'park-and-ride' sites were set up. These were designed to support shoppers and visitors from outside Salisbury. New houses should therefore be located close to or outside these sites. There are a number of elderly residents between Hollows Close and the Harnham Gyratory including the Salisbury City Almshouses and Welfare Charity site and the BUPA residential home opposite. This will only increase the likelihood of accident and death. Sadly, there was a death of a pedestrian outside my house on 15 August 2017. As well as the impact of the traffic of the new residents there will be the added problems caused by the heavy vehicles during the construction period. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	614	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Lack of Infrastructure. There is no new infrastructure being proposed such as shops resulting in all residents having to drive along the Netherhampton/Harnham Road to shop in Salisbury city centre or in the retail outlets on the Southampton Road, adding to existing congestion (as report in Reference B).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	615	Consultee James F Prain	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am a resident of Harnham and seek to lodge my objection to this proposal due to the following reasons. My house is on the Harnham Road within 100m of the traffic lights with Saxon Road. Traffic backs up my house from the Harnham Gyatory Roundabout (some 750m to the east) every morning from 08:00 -09:15 hours. This causes noise and pollution so that I have to keep all my road facing windows shut. As well as the impact of the traffic of the new residents there will be the added problems caused by the heavy vehicles during the construction period. No mitigation plans for Harnham Road Residents. There are no plans to mitigate the disruption to residents of Harnham, especially those who live on the Netherhampton Road and the Harnham Road. Solutions could include laying low noise road surface, insert traffic calming measures to force drivers to keep to the speed limit and providing triple window glazing to those living along these roads.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	616	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is no significant new employment on the west side of Salisbury. Housing should be built close to the centres of employment.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	617	Consultee James F Prain	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125626	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Given the need for 'affordable housing' for the current population, there are no guarantees from the developer to cater for this. Other recent housing developments would indicate that building 'executive' housing provides a greater profit for the developers, without benefit to local residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	618	Consultee Sam Driscoll Heritage Planning Services	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125727	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		6.4 Devizes Community Area Topic Paper			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have been asked to respond to you with regards to The Spring, Market Lavington (draft planning policy site 3268). I note that the site may be scheduled to be rejected for development on the grounds of an old designation. Following a trench evaluation of the site in 2016 the site was shown to have low archaeological potential. There is no evidence of Medieval fishponds or Post -Medieval meadows. Instead significant evidence of quarry / clay extraction was noted. I have consulted with Rachel Foster, Wiltshire Planning Archaeologist who has confirmed that the designated area is not recognised as having a high archaeological potential and having visited the site during the trench evaluation she was happy that there is no significant archaeology.</p> <p>I have included a link to the report below and a reference to the old designation. In my considered opinion the site does not have a high archaeological potential and I would ask that the old designation be disregarded in view of the new information supplied by the programme of archaeological investigation.</p> <p>https://www.dropbox.com/s/ch2orkfmliht51q/Results%20of%20a%20Programme%20of%20Archaeological%20Investigation%20The%20Spring%20Market%20Lavington.pdf?dl=0</p> <p>I would be grateful if you could amend the recommendation to object to development of this site on the grounds of archaeology. Please let me know if you need any further information at this stage?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	619	Consultee Kevin Watson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 910890		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A34 Christian Malford settlement boundary		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Settlement boundary proposed for Christian Malford has been proposed without regard for the NDP - part of which Wiltshire Council required the development to propose a settlement boundary. Calls into question the validity of the document when such errors are clearly present. Adopt the settlement boundary proposed by the NDP team. This information is already held by Wiltshire Council.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	620	Consultee Dr Andrew Jupp Person ID: 1125644	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Crudwell				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Wiltshire Housing Site Allocation Plan Crudwell proposals - Ridgeway Farm</p> <p>I am writing to comment on the draft Wiltshire Housing Site Allocation Plan (WHSAP) and specifically in relation to the village of Crudwell where I live. I have lived in the village with my wife for the past six years, and am some 200m from where existing development has started (10 houses) and where a proposed allocation of a further 40 dwellings are planned. I am extremely concerned about the proposed allocation of the additional 40 dwellings for the reasons set out below.</p> <p>General policy issues</p> <p>The Site Allocation Plan notes that housing will only be allocated by Wiltshire Council where there is a strategic priority to do so. Whilst I fully understand that Wiltshire Council needs to ensure an adequate five-year housing supply across each housing market area, the Site Allocation Plan would result in an over-supply of 4,284 dwellings to 2026 once past completions, deliverable commitments and windfall sites are taken into account. Even if one were to assume (unlikely) that there would be no windfall sites, the over-supply would still be 2, 198. The Site Allocation Plan further results in an over-supply of homes in the Malmesbury Community Area, even without windfalls. It is clear, therefore, that there is no strategic need to identify any new homes in Crudwell.</p> <p>Crudwell specific issues</p> <p>I acknowledge that Crudwell has been late in producing a Neighbourhood Plan, due in part to a Parish Council which was struggling to attract members and to function adequately. This has now been addressed, and the village has started to work on a Neighbourhood Plan. As part of this we will be undertaking a survey to determine the extent of local need for housing and other land uses. This local need will be considered in the context of other constraints to determine where and how any identified local need can be met.</p> <p>Crudwell is unsuitable for large-scale development for a number of reasons. New homes will require additional space at the CE Primary School. I understand that the Council's Education Department considers that at least one new classroom will be required. The school is on a constrained site and lies in a conservation area, so its ability to expand is not guaranteed. The village has severe flooding problems. A large proportion of the village is at risk of flooding from waterways , surface water, or both. the road capacity is already constrained, with dangerous speeding both along the A429 and Tetbury Lane. The proposed development is in a conservation area and little attention has been paid to the environmental and ecological impacts of this.</p> <p>Our house specific issues</p> <p>The noise and disturbance from the existing development of 10 new houses is already very intrusive. A large-scale development site lasting several years will be unbearable to live with. Views across open farmland (in a conservation area) will be lost forever. The public right of way leading from the development runs right past our house. There will be increased footfall, noise, loss of privacy, dog-fouling and littering.</p> <p>Overall</p>				

	<p>As there is no strategic need for large-scale development in Crudwell, I consider that it would be more appropriate for the Neighbourhood Plan to determine the level of local housing need, to consider how the existing infrastructure might be expanded to accommodate any needs and to consider the wider issues identified above.</p> <p>Crudwell is not anti-growth . However, I believe that small pockets of individual development, in keeping with the existing infrastructure is far more suitable and sustainable, and would have a far less negative impact on the village. Just because an opportunistic land owner and developer have offered up a single site does not mean that this is the right solution for the needs of Crudwell and the wider Wiltshire housing need.</p> <p>I trust that Wiltshire Council will work constructively and sympathetically with the village of Crudwell to determine the most appropriate solution for all concerned.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	621	Consultee Ms Catherine Greenland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	622	Consultee Mr Steven Harrison	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125632		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site will need to have an access point onto the A361. This stretch of the road is already very congested heading into town at peak times, and an accident black spot. Additional traffic from this site and proposed sites 1021 (Church Lane) and 3565 (Southwick Court) will exacerbate the problem.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	623	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Town Council does NOT support 263/297 – Hilperton Gap</p> <p>Town Council policy is to oppose development in the Gap. Town Council supports WCS policy to protect open countryside between the town and neighbouring villages. Part of the site is owned by Wiltshire Council. Part of the site is subject to a planning application by Framptons/HPT which has recently been updated. 16/00672/OUT. All of the site lies in Hilperton Parish.</p> <p>Resolution: Trowbridge Town Council opposes the allocation of site 263/297 between Victoria Road/Albert Road in Trowbridge and Elizabeth Way in Hilperton, as being contrary to the WCS aim to maintain open countryside to protect the character and identity of Hilperton as a separate community.</p>				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	624	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Town Council does NOT support 298 North Bradley Gap			
Attached files (Please see Objective)		The Town Council supports WCS policy to protect open countryside between the town and neighbouring villages, located in North Bradley parish.			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Resolution: Trowbridge Town Council opposes the allocation of site 298 between White Horse Business Park on the edge of Trowbridge and North Bradley village, as being contrary to the WCS aim to maintain open countryside to protect the character and identity of North Bradley as a separate community.			
		4697043			

Comment ID:	625	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Town Council does NOT support 3565 Southwick Court Gap</p> <p>Proposed by Waddeton Park, agent Savills. Letter to town council 12th January 2017. Town Council supports WCS policy (see below) to protect open countryside between the town and neighbouring villages. Located in Southwick and North Bradley parishes.</p> <p>Resolution: Trowbridge Town Council opposes the allocation of site 3565 between Lambrok Stream/Boundary Walk Trowbridge and Southwick Court in Southwick, as being contrary to the WCS aim to maintain open countryside to protect the character and identity of Southwick as a separate community.</p>				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	626	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Trowbridge Town Council supports the allocation of site 613/248 Elm Grove Farm for 200 houses as a logical infill site situated between two parts of the proposed Trowbridge Settlement Boundary, between the existing residential development and White Horse Business Park and also adjacent to the Ashton Park urban extension, which would result in the White Horse Business Park acting as an appropriate barrier to the urban envelope.				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	627	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Trowbridge Town Council supports the allocation of site 1021 Church Lane for 45 houses as a logical extension of the town which lies between the Trowbridge settlement boundary and Southwick Country Park, with the Lambrok Stream, acting as an appropriate natural barrier to the urban envelope.				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	628	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Discussions have been held with Newland Homes who expressed an interest in this site, located within the town boundary. Trowbridge Town Council supports the allocation of site 3260 for 20 houses, as a logical extension of the town which lies between the Trowbridge settlement boundary and Lambrok Stream which acts as an appropriate natural barrier to the urban envelope.				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	629	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Trowbridge Town Council supports locations in and around Trowbridge to meet 1432 of the 1907 houses requirement for Trowbridge.				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	630	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge Community Area Topic Paper				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Another site which the town council supports but have been removed: 256 South of Green Lane, between 167 (HSAP) and 272 (application) homes, is the extension to Castle Mead. Has been discussed by the town council with Persimmon, was subject to a planning application submitted in April 2016: 16/03420/FUL (See Appendix A)</p> <p>Resolution: Trowbridge Town Council supports the allocation of site 256 South of Green Lane for 167 new dwellings, as being a logical extension of the town which lies between the proposed Trowbridge settlement boundary and Green Lane Wood which acts as an appropriate natural barrier to the urban envelope and where further mitigation measures to reduce recreational and other impacts on Bechstein and other bat species in line with existing development, permissions and allocations can be satisfactorily achieved.</p>				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	631	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Whole Plan			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Another site which the town council supports but have been removed:</p> <p>292 North of Green Lane, between 170 and 250 homes, lies between Ashton Road and Paxcroft Mead and is located in Steeple Ashton parish. Has been discussed with Taylor Wimpey and with Steeple Ashton Parish Council. was subject to a planning application submitted in May 2016 and recently revised: 16/04468/OUT (See Appendix A)</p> <p>Resolution: Trowbridge Town Council supports the allocation of site 292 North of Green Lane for 170 new dwellings, as being a logical extension of the town which lies between the proposed Trowbridge settlement boundary and Ashton Road which acts as an appropriate barrier to the urban envelope and where further mitigation measures to reduce recreational and other impacts on Bechstein and other bat species in line with existing development, permissions and allocations can be satisfactorily achieved.</p>				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	632	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge Community Area Topic Paper				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Another site which the town council supports but have been removed: 3247 West Ashton Road, between 210 and 300 homes, employment allocation is being promoted for residential purposes by Persimmon. A recent exhibition took place at the Civic centre (25thMay 2017). If necessary additional employment land in the Ashton Park allocation to compensate. The HSAP incorrectly identifies this site as being part of the Ashton Park allocation.</p> <p>Resolution: Trowbridge Town Council supports the allocation of site and 3247 Biss Farm for 210 new dwellings, as being a logical extension of the town which lies between the proposed Trowbridge settlement boundary and the Ashton Park allocation and would support the reallocation of parts of Ashton Park closest to White Horse Business Park for employment uses to compensate for the loss of this area as an employment allocation, without reducing the build rate at Ashton park within the plan period.</p>				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	633	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge Community Area Topic Paper				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Together sites 256, 292 and 3247 could provide between 547 and 822 homes, so that the sites at Southwick Court (3565), the Hilperton Gap (263 & 297) and between North Bradley and White Horse Business Park (298) do not need to come forward. This means that the sites supported by the town council would deliver at least as many new dwellings as the sites preferred by Wiltshire Council.				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	634	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Community Area Topic Paper		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Brownfield sites and Windfalls</p> <p>In the HSAP Wiltshire Council appears to ignore the number of homes which can be delivered from brownfield sites, either discounting them as being 'in the Settlement boundary' or including them in the overall North & West HMA Windfall figure.</p> <p>An analysis of the sites which have been removed due to them being located in the Settlement Boundary shows that some 250 homes are identified against such sites in Trowbridge including 55 at the District Council Offices, which was subject of a public consultation by Newland Homes for 80 homes.</p> <p>Other sites are not even identified, even though Wiltshire Council are the owners or have been in discussion with the owners about proposals for residential development. The One Public Estate Bid from Wiltshire Council includes the following:</p> <p>"Work Stream 1: Trowbridge</p> <p>Overview: As a result of the programme of work supported by OPE Round 3, high level master planning and analysis of the site show that the East Wing site of developed in conjunction with the current hospital site has the potential to deliver 300 new homes;"</p> <p>The document identifies "The Outputs by 2020: 300 new homes," and also notes that this site "would act as a catalyst for the transformation other key sites in Trowbridge such as: . . . Bowyers . . ."</p> <p>The masterplan for Innox Mills (Bowyers) indicates that at least 100 new homes are likely to be provided on that site.</p> <p>The National Planning Policy Framework (NPPF) identifies Windfalls as follows: Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available. It can therefore be concluded that on the basis that the Former District Council Offices has been specifically identified by Wiltshire Council and the East Wing site has been specifically identified by Wiltshire Council and that the Bowyers site has been specifically identified by Wiltshire Council they should all be included in the preferred sites list with minimal risk that they would not be delivered by 2026.</p> <p>Resolution: Trowbridge Town Council supports the inclusion of specifically identified sites, which as such are not defined by the NPPF as Windfalls and are located within the Trowbridge Settlement Boundary: Former District Council Offices, Bradley Road 70 dwellings</p>				

	East Wing/Trowbridge Hospital/Margaret Stancomb School Bowyers	300 dwellings 250 dwellings
Attached files (Please see Objective)	4697043	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		

Comment ID:	635	Consultee Mr Lance Allan Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Trowbridge Town Council Person ID: 391073		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Community Area Topic Paper		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Other Towns and Villages</p> <p>So if Ashton Park is not delivering soon enough why is Trowbridge still bearing the brunt of the additional allocations for the North and West HMA when other towns are finding it much easier to meet their targets? Wiltshire Council has recognised difficulties in meeting the target for Trowbridge for some time.</p> <p>Q - There is a significant shortage of dwellings / capacity in Trowbridge, will the Council look at other areas to help address supply in the local area. For example, is there merit in seeking to identify more land / SHLAA sites in Warminster? In other words, how will you settle the Trowbridge supply problem? Will it result in a further decant of housing numbers to other areas?</p> <p>A - We will test SHLAA capacity at Trowbridge against the overall indicative requirement. This process is ongoing and involving: transport modelling / assessments and other disciplines. We have to test the projected quanta in other areas and see whether there is an opportunity for identifying additional development sites at other settlements in the same HMA. However, the process of flexing supply requirements within HMAs will nonetheless need to examine and assess the individual geography of places as some settlements may (or may not) have opportunity to grow. Warminster has a strategic allocation and planning issues to address - e.g. flood risk. Therefore, as part of the process of testing the ability for Trowbridge to accommodate the uplift in housing numbers, consideration may need to be given to other Market Towns and local Large Villages.</p> <p>It is now clear that evidence clearly indicates that Trowbridge cannot meet the requirement and that towns such as Melksham and Westbury are being denied the opportunity to grow and develop to sustain services.</p> <p>Resolution: That Trowbridge Town Council supports the reallocation by Wiltshire Council of the remaining 475 houses within the North and West HMA from Trowbridge to other towns and villages which have demonstrated an ability to deliver higher than planned completions up to 2017 and can offer sustainable development sites in the plan period</p>				
Attached files (Please see Objective)	4697043				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	636	Consultee Mrs Jo Edwards	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125656		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane H2.6 Southwick Ct			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions In the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide : The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	637	Consultee Mr Richard Cole Person ID: 1125438	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>NOT FAIR OR PROPORTIONATE</p> <p>The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it - destroying it's character</p> <p>The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council's estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary?</p> <p>The Draft Allocation Plan is unsound since, regarding Site H3.1/S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible.</p> <p>The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all.</p> <p>We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around "critical mass". A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not "sustain" a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process.</p> <p>Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	638	Consultee Mr Richard Cole	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <p>The Housing Delivery Strategy describes the proposed allocations as being "in Salisbury", "Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy."</p> <p>It should also be noted that such "Salisbury Transport Strategy" as exists is not detailed and has never been subject to public consultation or formal adoption.</p> <p>Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end, the bridges over the Avon.</p> <p>We have heard talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague "solutions" should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through.</p> <p>Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.</p> <p>Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	639	Consultee Mr Richard Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess.</p> <p>We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all.</p> <p>Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	640	Consultee Mr Richard Cole	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites.</p> <p>Site S1027 is well known locally for having standing water regularly during the winter.</p> <p>Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	641	Consultee Mr Richard Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity. Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	642	Consultee Mr Richard Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.</p> <p>Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	643	Consultee Mr Richard Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The National Planning Policy Framework (NPPF) includes a key principle "to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...". The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed. Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	644	Consultee Mr Richard Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan. Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	645	Consultee Mr Richard Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed sites along the Netherhampton Road are described as being within the "settlement area" of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain. Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	646	Consultee Mr Richard Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125438		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset.</p> <p>Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	647	Consultee Mr Richard Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125438		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school. Find several different sites, near park & rides, not on a B road, bounded at both ends by flood plain and river.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	648	Consultee Mrs Jo Edwards	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125656	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane H2.6 Southwick Ct			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "in the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles). No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Freme Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	649	Consultee Mrs Jo Edwards	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125656	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane H2.6 Southwick Ct			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It Is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds. In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	650	Consultee Dr Louis Lillywhite	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124313		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury Community Area Remainder		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		In accordance with the NFF the plan should "be genuinely plan-led, empowering local people to shape their surroundings,". The site allocated for the Westbury Community Area is allocated to a location to which the Parish Council has on a number of previous occasions stated as unsuitable and representing a substantial intrusion into the rural landscape (primarily from the iconic ridge leading to the White Horse and the main approach to the village). The NFF specifically refers to "recognising the intrinsic character and beauty of the countryside" which the proposed development appears to ignore. Whilst the Atkins assessment does suggest mitigation, this is unlikely to be fully effective even in the summer months and will be ineffective in the winter months.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	651	Consultee M G Wakeham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125690	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane H2.6 Southwick Ct			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions In the Strategy</p> <p>A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide :</p> <p>The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify wherebuilding would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment.</p> <p>I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	652	Consultee M G Wakeham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125690	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane H2.6 Southwick Ct			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "in the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles). No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	653	Consultee M G Wakeham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125690	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane H2.6 Southwick Ct			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds. In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	654	Consultee Malcolm Bines Councillor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Sutton Benger Parish Council Person ID: 1125702		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Sutton Benger				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Sutton Benger have already suffered from a large influx of housing development and therefore agree that no new developments should take place apart from those already planned. The current infrastructure has restrictions: an infrequent bus service no shops an increasing aged population with one doctors surgery the primary school has only enough capacity for planned development and has insufficient room for expansion.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	655	Consultee Mr J Knott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125429		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The roads around this site are already busy and are congested during peak hours, extra traffic would cause more congestion and increase noise and air pollution. There is no local employment and unemployment is very low in Trowbridge.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	656	Consultee Mr J Knott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125429		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is no local employment and unemployment is very low in Trowbridge.				
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Comment ID:	657	Consultee Mr J Knott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125429		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The fields get waterlogged as does our garden which backs onto one of the fields.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	658	Consultee Mr J Knott	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125429	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		We have concerns for wildlife and have seen deer, just recently a stag and two does. Also bats fly around at night and we have heard owls. We keep bees and have an apiary at the bottom of our garden for the bees to fly out over the fields, housing will reduce their forage. There is a large oak tree in the field which looks perfectly healthy and should not be removed. We have concerns over our wellbeing, I suffer from asthma and we moved from a built-up area to Woodmarsh so that we could benefit from a small village community and enjoy the countryside on our doorstep. If we have wanted to be part of a large housing estate we would have moved to one.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	659	Consultee Mr & Mrs Trout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1122982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide : The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites. Maintaining the local environment Sites 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	660	Consultee Mr & Mrs Trout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1122982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide : The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), Identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites. Maintaining the local environment Sites 1021 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	661	Consultee Mrs Sarah Tucker CLERK TO THE COUNCIL	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Amesbury Topic Paper and associated main document relating to Durrington			Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Market Town versus Large Village The draft plan and Wiltshire Core Strategy list Durrington along with Bulford and Amesbury as a Market Town, based on geographical boundaries and obvious transportation links to Amesbury. It makes little mention of Larkhill, which is part of the Parish (Durrington and Larkhill). Durrington should be seen as the unique large village it is, no more linked to Amesbury than perhaps the smaller villages of Cholderton or Newton Tony. Durrington is currently self-contained and sustainable. The Plan and Wiltshire Core Strategy should therefore reflect Durrington as a Large Village, not the Market Town of Amesbury including Bulford and Durrington. Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]				
Attached files (Please see Objective)	4705468				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	662	Consultee Mrs Sarah Tucker CLERK TO THE COUNCIL	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		DURRINGTON TOWN COUNCIL		Do you consider the draft WHSAP is sound?	No
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Please identify the policy, paragraph, table, figure or site to which you are referring.		Amesbury Topic Paper and associated main document relating to Durrington		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SUSTAINABILITY</p> <p>Services</p> <p>The Town Council acknowledges that there may be a positive impact on local businesses in the village, this was highlighted in the recent survey it conducted and is recognised in the Plan. It does not however believe it could be any more sustainable than it already is. This is a statement that the Plan often quotes 'making Durrington more sustainable'. With a plethora of facilities; 3 x Mini Supermarkets (including a Post Office), 3 x Schools covering all age groups, along with pre-schools, 6 x Take Aways, Hairdressers and Barbers shops, 2 x Doctors Surgeries, a Chemist, a DIY shop, a Flower shop, a Carpet shop, a Petrol Station, 2 x MOT/Repairs garages, a Swimming Pool, Fitness Centre, Dance Studio and Vets. The only real service missing in the village is a Dentist, but with Dentists in Tidworth and Amesbury at capacity and not taking on new patients either on the NHS or through Private Dental Providers any new residents would have to seek this service outside the immediate area.</p> <p>At present there are two doctors surgeries in the village, one of which will close in early 2019. Its patients will potentially be relocated to new facilities at Larkhill once they are built. We therefore see a reduced capacity within Durrington.</p> <p>There is a known issue with availability of pre-school places, where will the pre-school aged children of the additional service families along with those of the 60 new families go, particularly given insufficient places at Larkhill?</p> <p>Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]</p>			
Attached files (Please see Objective)		4705468			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	663	Consultee Mrs Sarah Tucker CLERK TO THE COUNCIL	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Amesbury Topic Paper and associated main document relating to Durrington			Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Employment The Plan makes assumptions that 60 more homes will bring employment to the village to help make Durrington more sustainable. The Town Council does not believe that there is significant employment opportunities within the village, 60 more homes will not bring more employment. It will have the opposite effect and will likely increase the carbon footprint of the village with residents travelling outside of the village for employment, impacting more on the roads. Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]				
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Comment ID:	664	Consultee Mrs Sarah Tucker CLERK TO THE COUNCIL	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington		Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure</p> <p>The Plan allocates two sites for Durrington, both sites will negatively impact on the roads, parking and public safety in the village.</p> <p>The proposed 45 homes off Clover Lane are intended to be linked into the current road structure on Clover Lane through two access roads that were built during the original build phase of the Avon Fields development in 2012. These roads were built to link to an extra 15 homes where planning had been approved but not taken place. Notwithstanding the 15 homes for which planning has been granted, an additional 30 homes are now being planned. This would bring into question the Design and Access Statement of Avon Fields which was for a total of 156 homes and whether the current access roads and road structure within the estate could sustain an additional 30 homes.</p> <p>Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]</p>				
Attached files (Please see Objective)	4705468				
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		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Amesbury Topic Paper and associated main document relating to Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Army Rebasing – Larkhill</p> <p>The Core Strategy and Plan do not fully consider the impact of Army Rebasing in Larkhill on Durrington. Not only are in excess of 440 homes being built at Larkhill for service personnel and their families, but there will also be an increase in approximately 1500 single service personnel arriving in Larkhill. Given the facilities and services that Durrington has, the Town Council believes there will be a significant increase in traffic to and from Durrington. How can Wiltshire Council have thoroughly considered the potential impact of Army Rebasing on Durrington given there is little evidence or mention of it in the Plan? The Town Council believes a common sense approach should be adopted in relation to the development of the sites allocated in the Plan until post Army Rebasing and the full impact on Durrington's infrastructure, self-containment and sustainability can be fully assessed.</p> <p>Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]</p>				
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Comment ID:	666	Consultee Mrs Sarah Tucker CLERK TO THE COUNCIL	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Amesbury Topic Paper and associated main document relating to Durrington			Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Roads An increase of 60 homes in Durrington plus Army Rebasing at Larkhill will have a detrimental impact on public safety, our roads and parking, which the Town Council believe to be at full capacity. This was the main concern of residents in the survey responses submitted and at the Public Meeting held. There is serious congestion in the village for high percentages of the day when navigating the narrow village streets. It is also potentially dangerous due to the levels of traffic including HGVs, buses, school pick up and drop off locations due to access issues at schools. The Town Council also foresees the impact of Army Rebasing as mentioned above on the village's roads. Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]</p>				
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Amesbury Topic Paper and associated main document relating to Durrington			Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Sewerage and Drainage Flash flooding is an issue in areas of the village, this is partly linked into the system being overburdened following years of the village's expansion. Could the current system cope? Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]				
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		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
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Please identify the policy, paragraph, table, figure or site to which you are referring.	Amesbury Topic Paper and associated main document relating to Durrington			Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Conservation</p> <p>Durrington is unique in where it sits in Wiltshire and how it shares its tight boundary with Conservation areas, SSSIs, the River Avon and of course Salisbury Plain, there is therefore concern over how these areas will be affected through further development. Durrington is already acknowledged via the Wiltshire Council's Draft Open Spaces 2015-2026 document as being under resourced in recreational and open space. It is therefore important to protect the limited green space and woodland available in the village. Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]</p>				
Attached files (Please see Objective)	4705468				
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Comment ID:	669	Consultee Mrs Sarah Tucker CLERK TO THE COUNCIL	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Amesbury Topic Paper and associated main document relating to Durrington			Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Affordability</p> <p>The Town Council understands that there is a need for land supply and houses and that some of those houses need to be affordable (rent/purchase). The Wiltshire Housing Needs Survey of 2015 (page 13) states that given the annual median income in Wiltshire (£19,254 in 2013) it would be unlikely that a current Durrington resident wanting to buy or rent a home in Durrington would be able to afford to do so. This potentially means that any new homes built as part of the Plan in Durrington, whilst meeting Wiltshire Council quotas won't necessarily assist in getting those Durrington residents who want to buy or rent in the village a home to live in. This will result in more residents from outside of Durrington moving to live in Durrington, whilst Durrington residents wanting to buy or rent locally may have to move elsewhere to more affordable homes.</p> <p>Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]</p>				
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		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Amesbury Topic Paper and associated main document relating to Durrington			Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Boundary Settlement Review The Town Council objects to the expansion of the current settlement boundary to fulfil the Plan, overturning what was considered in the Salisbury District Local Plan a 'safe' plan. The village has positively contributed to conducting infill in line with its Village Design Statement recognised by Wiltshire Council. Over 40 infill developments have taken place in the past 5 years, in addition to the 140 homes built at Avon Fields. With the increase of 440 homes in Larkhill, the Parish will see a 34% increase in homes over an 8-10 year period, potentially making Durrington less sustainable. There is concern that once the settlement boundary is expanded to include new sites for development under the Plan the boundary will potentially be expanded again and again to include other sites outside the current and/or projected boundary post the delivery of the Plan. Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]				
Attached files (Please see Objective)	4705468				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	671	Consultee Mr Derek Salmon Head of Property	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Clifton Diocese Person ID: 1125625		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraph A95 Figure A70			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Church of the Good Shepherd, Barford Lane, Downton has been excluded from the revised Settlement boundary (locations L3 and M3 on the Revised Settlement Plan at Figure 70). The building and surrounding site is shown as beyond the Settlement Boundary Downton which is designated as a Principle Service Centre. The proposed boundary in this location is inconsistent with other locations on the plan where the Settlement Boundary has been amended to include buildings and sites that are physically related to the settlement. The proposed Settlement Boundary in this location is not consistent with the Boundary Review Methodology set out in Part 2 of Topic Paper 1: Settlement Boundary Review Methodology. The Settlement Boundary should be amended so that it includes the church and land as identified by red outline on the attached Plan No. 1 The amendment would be in keeping with other amendments to the Settlement Boundary. The amendment would be consistent with the Boundary Review Methodology as detailed in Part 2 of Topic Paper 1: Settlement Boundary Review Methodology. The site is integral to the Principle Service Centre and should be included within the Settlement Boundary.</p>				
Attached files (Please see Objective)	4709038				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	672	Consultee Mrs Sarah Tucker CLERK TO THE COUNCIL	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		DURRINGTON TOWN COUNCIL Person ID: 1124540		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure</p> <p>The Plan allocates two sites for Durrington, both sites will negatively impact on the roads, parking and public safety in the village.</p> <p>The proposed 15 homes on Larkhill Road would be sited on a busy A road that already suffers from speeding vehicles, parking and congestion issues, as well as it being a rat run through to the A303. The Town Council does not believe that the site has the capacity for 15 homes in the building line as is consistent with the current line of permanent residences along this side of Larkhill Road.</p> <p>Please refer to the attached documents [the content is summarised in reps 409, 661, 662, 663, 664, 665, 667, 668, 669, 670 and 672]</p>				
Attached files (Please see Objective)	4705468				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	673	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		7.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There needs to be a thorough review of the 'actual' housing numbers which are used in this document since as it currently stands the Housing Allocations does not appear to be 'positively prepared' - i.e. not based on objectively assessed development and infrastructure requirements. As a specific example, the Old Manor Hospital (site ref 3/LPA/11 in the Housing Land Supply Statement published in March 2017 indicates that the Old Manor Site has 80 dwellings outstanding at April 2016 and 71 planned to be delivered in 2018/19. However the Old Manor Site has been the subject of successful planning applications in respect of 4 different phases of development, the figure of 71 appears to refer only to the dwellings proposed in the first Phase of development. The total number of dwellings to be delivered over the course of all 4 phases is approximately 200. We need to be assured that the actual housing numbers are based on sound facts, checks and corrections are needed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	674	Consultee Mr & Mrs Paul and Lynn Stoney Person ID: 1125563	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	S1027, S1028			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1) Extra traffic:- It is obvious to everyone that Netherhampton Road cannot take the extra traffic generated by the houses once built on sites 1027 and 1028 nor the construction traffic in the building process.. Already, even without this huge development, the road is getting busier and busier. We live on the Netherhampton Road and have noticed the increase in traffic in the 6 years we have lived here. Significant traffic jams already arise because large lorries, tractors/farm vehicles and double-carriage livestock transport use this road as well as domestic traffic and emergency vehicles . Bottlenecks happen already. There is no way of widening the road because of houses from the junction with Upper Street right up to the Harnham Gyratory. The Harnham Gyratory itself can't take any more traffic. This also means that site 3272 at Woodbarrow should not happen either. In emergency situations ambulances very frequently come racing along Netherhampton Road with sirens screaming. It is completely crazy to suggest adding approximately 1000 cars per day to this mix. The roads simply can't take it, and can't be widened. There are immovable pinch-points because of the river systems, for example the newly-repaired New Bridge at Harnham. The traffic getting to Southampton is already dire. The Netherhampton Road, the A3094, is the major route taken by traffic wanting to get to and from Bournemouth or the south to Bath or Bristol. It is not suited to that task already, and cannot possibly accommodate such a huge and sudden increase in volume. The gyratory deals with traffic getting to Bournemouth and Southampton and is already at full capacity. The Southampton Road roundabout by Wiltshire College is a notorious gridlock already. It does not make any sense to propose any more housing developments in Salisbury without a thorough, holistic review of the transport systems.</p> <p>1) Justified/Not justified: We understand that more housing is needed. People need decent places to live, and affordable places to live. We need more socially-affordable housing. However we doubt very much whether developers are the people to deliver this. We also have to live for ever with the consequences of ill-thought-out changes or decisions based on cost-cutting or corporate money-making considerations. These far-reaching decisions must be based upon consideration of what is really needed. I personally believe that the policy of adding house-building to preexisting urbanised areas, especially in a beautiful county such as Wiltshire, needs to be re-examined.</p> <p>2) Effective/Not effective: We believe this is a piecemeal proposal where a holistic planning strategy is needed. No more houses can be built until this is done. There needs to be a thorough review of the transport infrastructure around Salisbury before any more housebuilding can take place. There should also be a better analysis of the flood risks when building new houses on S1027 and S1028.</p> <p>3) Positively prepared/Not positively prepared: We believe there is a real case for creating a new market town for example, on the garden city lines, where the infrastructure would be able to cope because it was planned for; where there would be doctors' surgeries and schools as well as roads and houses, efficient transport links to other centres, rather than overwhelming existing infrastructures that simply cannot cope because they are already overburdened.</p> <p>4) National policy: We have not had time to study the national policy and so cannot comment as to whether this proposal is in line with it. However, river systems and the facts of physical geography have to be taken into account whether or not national policy aligns with it.</p>			

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	675	Consultee Mr G Gilbert	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446026	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With reference South Wiltshire HMA site, Netherhampton and Harnham Roads, plus Rowbarrow. Total 840 houses. As this is a large contract to be done in this area, I assume that the required infrastructure will be in place. i.e. new roads, possibly a ring road, together with any bridges, or even an underpass. If the above is not in place I can not see the above contract would fit into the existing congested area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	676	Consultee Mr G Gilbert	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446026	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition I have a copy of plans "provision" July 2014 re land at Harnham Business Park, a 'brown' field site, offering 65 homes plus a 60 bed hotel. Why has this not been built? P.S This did include 26 affordable dwellings.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	677	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		7.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Monitoring Framework</p> <p>The Wiltshire Monitoring Framework which has been published is inadequate in terms of checking the effectiveness of policies within the WCS. Looking specifically at the Transport policies, the targets and indicators all need to be revisited, but to give a specific example of the current inadequacies:</p> <p>Core Policy 63, Transport Strategies, among the important criteria for the Salisbury Transport Strategy is to deliver in terms of the modal shift which is aspired to. Indicators like 'number of cycle schemes' (is this a dropped kerb, a cycle parking stand or 10 km of cycleway?) and 'completed key bus routes upgrades' (more buses? Or a bus stop repaint?) are unclear and do not measure the required goals.</p> <p>Wiltshire Monitoring Framework needs updating to make it effective - i.e. it needs to reflect targets which are set in the WCS policies</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	If aspects of the Wiltshire Monitoring Framework are being reviewed these must be considered as an integral part of the development process and it is important that this contains appropriate measures				

Comment ID:	678	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		7.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Annual Monitoring Report There is no evidence that an Annual Monitoring Report has been produced which assesses progress against the proposals in the WCS, Wiltshire Council's website at 17.9.2017 shows Land Supply Statement updates but nothing else since 2011. Refer to screen print in attached Wiltshire Council Annual Monitoring Reports document. An Annual Monitoring Report is required, as are appropriate targets in the Monitoring Framework, otherwise the effectiveness of the WCS as a whole, and the additional housing being proposed in the draft Wiltshire Housing Site Allocations Plan, cannot be evaluated.</p>				
Attached files (Please see Objective)	4706489				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Any relevant data supplied in the Annual Monitoring Report should be subject to rigorous scrutiny.				

Comment ID:	679	Consultee Ms Sarah Nash	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 902116		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write to object most strongly to the proposed development of 650 houses on Netherhampton Road, Salisbury. I object on the grounds that it is not sound and not effective. I am a regular user of the A3094, firstly to take and fetch children to and from Harnham Schools, and secondly to get myself to work. It is already almost impossible to achieve this in a sensible time because of the sheer volume of traffic using the Harnham Gyratory and the A3094. The proposal to add approximately another 1000 cars on this bottleneck is ineffective. It will not be possible to widen the approach to the Harnham Gyratory without major disruption to local residents and homes. The newly built cycle lane will have to be abandoned.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	680	Consultee Rachel Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to object to the proposed building of housing at Southwick Court Farm, site 3565. This is a medieval field system currently standing in Southwick on the edge of Trowbridge.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	681	Consultee Rachel Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	While I agree that there is in Trowbridge a desperate need for more housing. It is the affordable and assisted type that are lacking. The Southwick site does not offer very good public transport to the town centre/train station, local shops and doctors surgery are not in comfortable walking distance for most people. This site would offer exclusive housing as its next to the Southwick Country Park, green fields around with distant views of Westbury White Horse and Salisbury Plain. This type of housing would not bring much if any economic wealth to Trowbridge.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	682	Consultee Rachel Turner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Southwick site does not offer very good public transport to the town centre/train station, local shops and doctors surgery are not in comfortable walking distance for most people. It is quite likely that the residents living here would not be working or shopping in Trowbridge. It would become a commuter estate for larger towns and cities nearby. This would put extra pressure on the roads, possibly the schools and doctors, but not give much back.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	683	Consultee Rachel Turner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site is less sustainable than other sites in Trowbridge and 5 moderate adverse effects have been identified. One could be that this sites floods every winter to a certain degree and on occasions it floods very badly. I can't see how this can be rectified without passing the flood risk further down the water course.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	684	Consultee Rachel Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1120653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Trowbridge town council is against development of this site and have identified other more suitable sustainable sites in Trowbridge.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	685	Consultee Sharon Coombs	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124637	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My one and only concern is that my back garden is NOT considered as undeveloped, unowned, green belt or free for the building on of houses. I have documentation that clearly states that my back plot of land was legally bought in 1969 by a previous owner of No.115 High Street, Littleton Panell.</p> <p>Our Deeds clearly show that when we purchased the property in 1984, the back plot of land was part of it.</p> <p>I am deeply concerned that anyone should think they have the right to put forward plans to build housing of any kind on it, when it clearly belongs to me.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	686	Consultee Ms Lynne Jordan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live locally near the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72,111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I don't feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	687	Consultee Ms Lynne Jordan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	688	Consultee Ms Lynne Jordan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	689	Consultee Ms Lynne Jordan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	690	Consultee Ms Lynne Jordan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	691	Consultee Ms Lynne Jordan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	692	Consultee Ms Lynne Jordan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	693	Consultee Ms Lynne Jordan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	694	Consultee Ms Lynne Jordan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	695	Consultee Ms Lynne Jordan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	696	Consultee Ms Lynne Jordan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	697	Consultee Ms Lynne Jordan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125761	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	698	Consultee Richard Hill Head of Property Thames Water Person ID: 1125766	Agent Katherine Jones Planning Administrator Savills Person ID: 1137501	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Water infrastructure requirements				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.</p> <p>As you will be aware, Thames Water are the statutory sewerage undertaker for the North West part of the Wiltshire authority area and are hence a “specificconsultationbody”in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:</p> <p>Development Sites</p> <p>Specific Water Supply and Sewerage/Wastewater Infrastructure Comments:</p> <p>We have reviewed the proposed sites and they all appear to be located outside of the Thames Water area. They appear to be located within the Wessex Water area and therefore we have no site specific comments. However, if any new sites are proposed within the Thames Water area we have the following general comments:</p> <p>Development Guidelines - Water Supply and Sewerage Infrastructure</p> <p>Thames Water seeks to work closely with the local planning authority to plan for the necessary water supply and wastewater infrastructure to service development in its area in accordance with the National Planning Policy Framework and the National Planning Practice Guidance.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: “Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</p> <p>Paragraph 162 of the NPPF relates to infrastructure and states: “Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Notwithstanding Core Policy 3 – Infrastructure Requirements of the adopted Core Strategy which support in principle, we consider it is important that the Allocations Plan considers the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network.</p> <p>Thames Water consider that text along the lines of the following should be added to the AAP to support the general Development Guideline:</p> <p>“Water Supply, Wastewater & Sewerage Infrastructure</p>				

	<p>Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure.</p> <p>Drainage on the site must maintain separation of foul and surface flows.</p> <p>Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.</p> <p>Further information on Developers on water supply and sewerage infrastructure can be found on Thames Water's website at: https://developers.thameswater.co.uk/</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	699	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.59			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Members also discussed the proposals for the review of the settlement boundary and resolved to object to any change to the settlement boundary for the parish, with the exception of proposing the inclusion of the disused tennis courts at East Marsh Farm Lower Road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	700	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	That the development would have an adverse effect on the conservation area of the parish, impacting views from higher ground and the White Horse				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	701	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Chairman and members of the Parish Council discussed the draft Housing Site Allocations Plan at a meeting of the Council held on Tuesday 12th September 2017.</p> <p>The Parish Council objects to the inclusion of the land at Bratton in the HSAP on the following grounds:</p> <p>That the development is outside the settlement boundary</p> <p>That there were other sites within the existing settlement boundary which needed to be considered which could provide the potential for development to meet local need within the settlement boundary</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	702	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	That the development would have an adverse effect on the conservation area of the parish, impacting views from higher ground and the White Horse				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	703	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	That the development would have an adverse effect on local amenity and represented over development				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	704	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	That the development would have a detrimental impact on already over burdened infrastructure				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	705	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	That the increase in residents would represent an unmanageable increase in traffic and create significant highway issues.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	706	Consultee Hill Homes Hill Homes Development Ltd Person ID: 900566	Agent Mr Steven Smallman Director Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.48			Positively prepared Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Core Policy 8 requires approximately 1,605 new homes to be provided in the Calne Community Area, of which about 1,440 homes should be at Calne. This reflects the spatial strategy set out in Core Policy 1 and the role and function of Calne as the only designated Market Town in the Community Area. Growth is to be concentrated at Calne to support a sustainable pattern of development and in recognition of the capacity of the Town to accommodate further strategic development.</p> <p>Table 2.2 of the Calne Community Area Topic Paper indicates that there is no "indicative residual requirement" for either Calne or the Remainder of the area. For Calne the table indicates an over-supply (completions plus commitments) of 328 dwellings. Since then, planning permission has been granted for 165 dwellings at Low Lane, Calne.</p> <p>The draft Neighbourhood Plan makes only one housing allocation (Land north of Low Lane) which is an existing commitment (July 2017). Whilst the Core Strategy disaggregates growth by Community Area, it also makes it clear that the assessment of the adequacy of Housing Land Supply (HLS) should be based on Market Housing Areas (HMA). Core Policy 2 provides that the minimum housing requirement for North and West Wiltshire is 24,740 for the period 2006 to 2026. Objective 2 of the HSAP is to "help demonstrate a rolling five year supply of deliverable land for housing development"</p> <p>The Council's latest Housing Land Supply Statement (Update) published in March 2017 (baseline April 2016) indicates a 5.73 HLS for the North and West Wiltshire HMA against a requirement of 5.25 years (allowing a 5% buffer). In July 2017 whilst allowing an appeal at Boreham Road Warminster, the Secretary of State, indicated that he accepted the Council's updated assessment of HLS. He did however comment that "In line with paragraph 47 of the Framework which requires local authorities to boost significantly the supply of housing, he takes the view that the five year requirement is a minimum and not a cap"</p> <p>In the light of the above, it could be argued that there is no need to allocate further land at Calne at this time. This was the Council's position when the draft HSAP was prepared. The draft Plan confirms at Paragraph 4.48:</p> <p>"Indicative levels of housing for Market Towns are not a ceiling and variations would not seem to present new or significant issues for local infrastructure and environmental capacity. A/locations made in the Plan are made to support the spatial strategy. It is not however practical for the Plan to completely re-dress imbalances in the distribution of development from what the spatial strategy envisaged. A review of the WCS is also the appropriate means to properly consider the performance and longer term prospects of settlements".</p> <p>However, this approach is not acceptable for the following reasons:</p> <p>the "indicative residual requirement" (see table below) of 1,440 dwellings must be regarded as an absolute minimum (as the Plan acknowledges).</p> <p>the adopted Core Strategy's overall requirement of 42,000 dwellings is based on an outdated SHMA. This was recognised by the Core Strategy's Inspector when he concluded "that at this current time the minimum housing figure within the CS should reasonably equate to at least 42 000 homes over the plan period with the flexibility to deliver more"(Paragraph 81 of the Inspector's Report). Whilst the updated SHMA has yet to be published, it is understood to confirm that the latest Objectively Assessed Need is greater than the Core Strategy provides for.</p>				

	<p>the NPPF's objective is to boost significantly the supply of housing (Paragraph 47), as the Boreham Road, Warminster decision reiterates. The HLS position in the HMA is only marginally positive.</p> <p>A review of the Core Strategy is not programmed in the latest LDS (Dec 2016). It is therefore difficult to see how a comprehensive review based on the latest OAN for housing can be put in place before 2020 at the earliest. Given the marginality of the 5 year HLS position, if no further housing allocations are made by the HASP, it is very likely that a HLS shortfall in the HMA will again occur before additional sites can be allocated through the review of the Core Strategy (or otherwise)</p> <p>The Neighbourhood Plan cannot be relied on to deliver the additional housing sites that are needed.</p> <p>Therefore, if the "plan-led" system is to operate within this HMA, the HSAP must provide sufficient flexibility to maintain an adequate supply of housing land pending the review of the Core Strategy. There is no reason why this should not be done. The Core Strategy emphasises that the housing requirements are minimum figures and that the indicative requirement figures for the market Towns are not ceilings. It also confirms that variations would not present new or significant issues for local infrastructure and environmental capacity . Whilst it may be right that it would be impractical to completely re-dress imbalances in the distribution of development - certainly between HMA's, we can see no reason why additional housing should not be provided by the HSAP at a Market Town (such as Calne) to provide flexibility to support the maintenance of an adequate HLS within the HMA.</p> <p>Calne has demonstrated that it can effectively accommodate growth and there is clear potential for further expansion to take place on the Town's eastern flank .</p> <p>The Plan has not therefore been positively prepared.</p> <p>A contingency allocation (reserve site) should be made at Calne to provide the necessary flexibility to assist in maintaining a 5-year HLS in the HMA during the period pending a review of the Core Strategy. Land north of Low Lane, the location and extent of which is shown edged red on the attached plan, would represent a logical and sustainable site which would complete the eastern expansion of the Town. The site should be confirmed as a Contingency Allocation for release should the HLS position in the HMA deteriorate (i.e. fall below 5.73 years).</p>
<p>Attached files (Please see Objective)</p>	<p>4709136</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	707	Consultee Hill Homes Hill Homes Development Ltd Person ID: 900566	Agent Mr Steven Smallman Director Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.48			Positively prepared Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Core Policy 8 requires approximately 1,605 new homes to be provided in the Calne Community Area , of which about 1,440 homes should be at Calne. This reflects the spatial strategy set out in Core Policy 1 and the role and function of Calne as the only designated Market Town in the Community Area . Growth is to be concentrated at Calne to support a sustainable pattern of development and in recognition of the capacity of the Town to accommodate further strategic development.</p> <p>Table 2.2 of the Calne Community Area Topic Paper indicates that there is no "indicative residual requirement" for either Calne or the Remainder of the area. For Calne the table indicates an over-supply (completions plus commitments) of 328 dwellings . Since then, planning permission has been granted for 165 dwellings at Low Lane, Calne.</p> <p>The draft Neighbourhood Plan makes only one housing allocation (Land north of Low Lane) which is an existing commitment (July 2017). Whilst the Core Strategy disaggregates growth by Community Area, it also makes it clear that the assessment of the adequacy of Housing Land Supply (HLS) should be based on Market Housing Areas (HMA). Core Policy 2 provides that the minimum housing requirement for North and West Wiltshire is 24,740 for the period 2006 to 2026. Objective 2 of the HSAP is to "help demonstrate a rolling five year supply of deliverable land for housing development "</p> <p>The Council's latest Housing Land Supply Statement (Update) published in March 2017 (baseline April 2016) indicates a 5.73 HLS for the North and West Wiltshire HMA against a requirement of 5.25 years (allowing a 5% buffer). In July 2017 whilst allowing an appeal at Boreham Road Warminster, the Secretary of State, indicated that he accepted the Council's updated assessment of HLS. He did however comment that "In line with paragraph 47 of the Framework which requires local authorities to boost significantly the supply of housing,he takes the view that the five year requirement is a minimum and not a cap'</p> <p>In the light of the above, it could be argued that there is no need to allocate further land at Calne at this time. This was the Council's position when the draft HSAP was prepared. The draft Plan confirms at Paragraph 4.48:</p> <p>"Indicative levels of housing for Market Towns are not a ceiling and variations would not seem to present new or significant issues for local infrastructure and environmental capacity. A/locations made in the Plan are made to support the spatial strategy. It is not however practical for the Plan to completely re-dress imbalances in the distribution of development from what the spatial strategy envisaged.A review of the WCS is also the appropriate means to properly consider the performance and longer term prospects of settlements".</p> <p>However, this is approach is not acceptable for the following reasons:</p> <p>the "indicative residual requirement" (see table below) of 1,440 dwellings must be regarded as an absolute minimum (as the Plan acknowledges).</p> <p>the adopted Core Strategy's overall requirement of 42,000 dwellings is based on an outdated SHMA. This was recognised by the Core Strategy's Inspector when he concluded " that at this current time the minimum housing figure within the CS should reasonably equate to at least 4Z 000 homes over the plan period with the flexibility to deliver more"(Paragraph 81 of the Inspector's Report). Whilst the updated SHMA has yet to be published, it is understood to confirm that the latest Objectively Assessed Need is greater than the Core Strategy provides for.</p>				

	<p>the NPPF's objective is to boost significantly the supply of housing (Paragraph 47), as the Boreham Road, Warminster decision reiterates. The HLS position in the HMA is only marginally positive.</p> <p>A review of the Core Strategy is not programmed in the latest LDS (Dec 2016). It is therefore difficult to see how a comprehensive review based on the latest OAN for housing can be put in place before 2020 at the earliest. Given the marginality of the 5 year HLS position, if no further housing allocations are made by the HASP, it is very likely that a HLS shortfall in the HMA will again occur before additional sites can be allocated through the review of the Core Strategy (or otherwise)</p> <p>The Neighbourhood Plan cannot be relied on to deliver the additional housing sites that are needed.</p> <p>Therefore, if the "plan-led" system is to operate within this HMA, the HSAP must provide sufficient flexibility to maintain an adequate supply of housing land pending the review of the Core Strategy. There is no reason why this should not be done. The Core Strategy emphasises that the housing requirements are minimum figures and that the indicative requirement figures for the market Towns are not ceilings. It also confirms that variations would not present new or significant issues for local infrastructure and environmental capacity . Whilst it may be right that it would be impractical to completely re-dress imbalances in the distribution of development - certainly between HMA's, we can see no reason why additional housing should not be provided by the HSAP at a Market Town (such as Calne) to provide flexibility to support the maintenance of an adequate HLS within the HMA.</p> <p>Calne has demonstrated that it can effectively accommodate growth and there is clear potential for further expansion to take place on the Town's eastern flank .</p> <p>The Plan has not therefore been positively prepared.</p> <p>A contingency allocation (reserve site) should be made at Calne to provide the necessary flexibility to assist in maintaining a 5-year HLS in the HMA during the period pending a review of the Core Strategy. Land north of Low Lane, the location and extent of which is shown edged red on the attached plan, would represent a logical and sustainable site which would complete the eastern expansion of the Town. The site should be confirmed as a Contingency Allocation for release should the HLS position in the HMA deteriorate (i.e. fall below 5.73 years).</p>
<p>Attached files (Please see Objective)</p>	<p>4709136</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	708	Consultee Mr Philip Redhead	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125773		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan to build 200 homes in this area is not supported for the following reasons:</p> <ol style="list-style-type: none"> 1. This is a green field site of outstanding natural beauty. Brown field sites such as the former Bowyers factory should be developed first before considering green belt areas such as this. 2. We have lost too many green field sites to housing around Trowbridge over the last 5-10 years and it is time to look elsewhere. Brown field sites must be developed first in preference to green belt land. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	709	Consultee Margaret Sheldon Person ID: 1125772	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way Site		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by one quarter during the Plan period (and more after that) which exceeds the requirement for a five year supply. The Town Council have resolved to opposed this development as as being contrary to the WCS aim to maintain open countryside so as to protect the identity and charactor of Hilperton as a separate community.</p> <p>The Plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion. As with the development of near by Staverton and Paxcroft estates no new jobs or substantial infrastructure improvements have materialised as were promised. All it will bring is added road congestion and further pressure on local services.</p> <p>The Plan is not effective because WC's examination of 'windfall', which is expected to provide 60% of new housing, is grossly inadequate – comprising one page out of 4,500 pages of the Plan documents.</p> <p>The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes. It may be cheaper and easier to build and destroy green field sites but by doing so Trowbridge town centre is withering away. By repopulating the central Brown field sites you will help rejuvenate the town and save the countryside.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	710	Consultee Mrs Vanessa Petrie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125789		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Court Orchard/Cassways Orchard			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The access onto the B3098 is dangerous, the field in question is at one of the narrowest points of the road. The water pressure in Bratton is already low another 40 houses would have a detrimental effect on the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	711	Consultee Mr Michael Steedman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125794		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site No.s H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Netherhampton residents oppose the plans for the following reasons</p> <p>NOT FAIR OR PROPORTIONATE • There is no “nimbyism” behind our objection. The constructive manner in which all residents of Netherhampton have engaged in the discussion with the Wilton Estate regarding the planning application for development at Netherhampton Farm demonstrates that there is acceptance of the need for new housing provided that its scale is in keeping with the existing settlement and can be sustained by the local infrastructure. Netherhampton has approximately 60 dwellings and this new development at Netherhampton Farm will increase that number by over 30%. This feels like a fair share of the overall commitment facing South Wilshire and Wiltshire generally. • The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury. • The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary? • The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	712	Consultee Mrs Stella Rose Person ID: 1106030	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1/S1028		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I cannot believe that it is legally compliant when all the facts are not available. No transport strategy has been proposed. Insufficient information available.</p> <p>There is insufficient information for any decision to be made. The A3094 is merely a link road so will funnel any additional traffic onto either the A36 Wilton Road or the Harnham Gyratory which handles substantial traffic from A36 Southampton Road, A354 and A338. Every Tuesday additional traffic passes along the A3094 to the Livestock Market. On race days, additional traffic passes along A3094 and on occasions is backed up to the junction with the A36 Wilton Road. The proposed development would add approximately 1500 additional vehicles as most households have two vehicles. On most mornings the traffic backed up from the Harnham Gyratory, sometimes as far back as the junction with Norfolk Road. A substantial number of vehicles are HGVs. Increasingly the route from A36 Wilton Road, via A3094 and then Race Plain Road, is used as a short cut to the A338 to avoid the Harnham Gyratory. Any additional development will add to this traffic - are there proposals to upgrade this narrow, minor road? Also the nearest P&R facilities are either Britford (having to negotiate the traffic to the Harnham Gyratory and beyond) or at Wilton. Due to the pinch point in Wilton centre, queues often build at the roundabout - A36 Wilton Road, The Avenue and Minster Street. Further massive development will have a detrimental affect on surrounding villages as drivers seek alternative routes to avoid traffic congestion.</p> <p>It is also suggested that this site becomes an alternative for some of the commercial premises currently on the Churchfields Industrial Estate. This will cause further congestion with additional delivery vehicles as well as staff vehicles. As it is planned to build a substantial number of residential houses on the Churchfields Estate, this surely would ensure the quota for Salisbury would be satisfied. The traffic from the proposed development at Churchfields could be far less as there is good access to the city centre and train station plus the site is within cycle and walking distance. The proposed cycle and walking access from H3.1/S1028 would prove too far for most people as providing satisfactory access to the town centre. Cycling maybe but walking is not really a viable option, especially in poor weather. The current bus service would need to be substantially expanded with further vehicles adding to the congestion. Most people would consider taking their car as the current options are not clear.</p> <p>South Wiltshire is projected to have a surplus of 937 accommodation units so the planned development of Harnham should not be considered and further work should be undertaken to provide residential accommodation with the use of the Churchfields Industrial Estate.</p> <p>Expand the current proposal for Rowbarrow or consider further development at the junction of The Avenue and A360 Devizes Road where some development has already taken place. Houses and businesses would have access to the A303 via A360 or A36 Wilton Road, plus P&R plus bus services. Consider moving industrial and business units from Churchfields Industrial Estate as more of a priority, freeing up suitable land for residential development. This should be at locations accessible for supply/delivery vehicles such as Amesbury or at the junction of The Avenue and A360 giving options for additional traffic.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Everyone's voice needs to be heard.

Comment ID:	713	Consultee Miss Pamela Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125829		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge area		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Trowbridge area with it's inadequate road infrastructure cannot attract and retain employment opportunities, therefore it should not be expected to accommodate the disproportionate number of houses currently proposed by WC. River crossings in the area are both inadequate and subject to annual flooding. Within it's town boundaries there are a considerable number of large brownfield sites eg Bowyer's, former mill sites etc - which, if developed would enhance the ambiance of the County Town and provide residential premises particularly close to the railway station, thereby relieving road usage to and from major centres of employment particularly Bath and Bristol. The plan should be drastically amended to enable building in locations that will allow residents to travel if required, in particular near mainline railways and major roads i.e M4 corridor. The centre of Trowbridge (County Town!) is a disgrace and an eyesore. Re-development of former industrial sites, as carried out in much of the Midlands and the North of the country, should be a priority.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	714	Consultee R D Horton Person ID: 1125714	Agent Mr Nathan McLoughlin Director McLoughlin Planning Person ID: 404491	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Representations on behalf of R D Horton and Son McLoughlin Planning has been instructed on behalf of R D Horton and Son to submit representations on the Draft Housing Site Allocations Plan June 2017, in respect of its land interests in the village of Broad Hinton. This representation is structured as follows:</p> <ul style="list-style-type: none"> • Representations on the Allocations Plan <p>The proposed housing site REPRESENTATIONS ON THE ALLOCATION PLAN</p> <p>In general, the respondents are concerned that the approach set out in the Plan is unsound in respect of the approach adopted towards new housing allocations. The respondent's position is that the Council's approach to the DPD is unsound. The commentary below sets out the reasons why. The respondents wish to have the opportunity to participate in the Oral Examination. Paragraph 4.3 The paragraph sets out that there is a "priority" for housing land allocation to be located at the higher tier settlements (excluding Large Villages) that meets objective 2 of the plan. The respondent's position is that this is contrary to the general approach set out in the Core Strategy for the following reasons. Core Strategy Core Policy 1 sets out the Settlement Strategy, identifying the various tiers of settlements across the County. Whilst the Policy sets out different requirements for each tier, the Policy does not set out any "priority" for where new development should be focused. This is further evidenced by Paragraph 4.15 of the Core Strategy which sets out that the HSA DPD will review settlement boundaries to allow new housing to come forward. In contrast, paragraph 4.3 of the HSA resembles a quasi-sequential approach to housing site allocations. In addition to the above concern, the blanket exclusion of housing allocation at large villages does not reflect the fact that in the case of some community areas in the East Wiltshire Housing Market Area (EWHMA), there is only one higher tier location. For example, the Marlborough Community Area has Marlborough as a "Market Town", no "Local Service Centres" and then a series of Large Villages. This blanket approach is counter-intuitive to the aims of the Core Strategy Strategic Objective 3, bullet point 4 at the foot of page 29, which seeks, as a key outcome: "The flexible approach will have allowed the council, for example through the preparation of the Site Allocations DPD ... to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach" Paragraph 4.5 The approach of the DPD is effectively set out in paragraph 4.5 This paragraph makes it clear that there are no allocations in the large villages in the EWHMA. This is on the basis that there is: "No strategic priority to do so due to the level of completions and supply committed within the HMA."</p>				

It is the respondent's position that whilst there is clearly a need for the Council to maintain a 5-year supply of housing land, this should not be confused with the need to meet Core Strategy housing targets by making site allocations as necessary and the reasons behind this are set out below.

CS Core Policy 2 sets out the plan's housing target of "at least" 42,000 new homes and requires the East Wiltshire HMA to provide a minimum of 5940 dwellings. As this figure is set as a minimum, there is some flexibility in the CS to allow an additional amount of new development to come forward in excess of the figures published in the plan.

Whilst the HSA is right in allocating sufficient sites to meet a 5-year housing land supply requirement, this is not the only requirement placed on the DPD. Table 4.9 of the DPD shows that the level of housing supply in the Marlborough Community Area (remainder) is as follows:

Target – 240 dwellings

Completions – 160

Commitments – 46

Shortfall – 36

As a result, the DPD is failing in its duty to meet the requirements of the first bullet point of Framework paragraph 47. The respondents recognise that the allocation of its site at Broad Hinton does not meet the overall outstanding housing requirement for the County, but it is a critical part of the overall approach set out in the Core Strategy, that large villages will deliver development. The allocation of land at Broad Hinton can account for the shortfall in such a way, which is consistent with the approach of the Core Strategy.

Objective 1: Definition of built-up areas

The respondents support the aim of the objective. However, for the reasons set out below, see a need for the boundary of Broad Hinton to be amended to accommodate additional development.

Objective 2: Housing Land Supply

The respondents object to Objective 2 because the approach is inconsistent with the requirements of the Core Strategy. Table 4.7 shows the East Wiltshire HMA as having an oversupply of 862 dwellings. However, this figure is based on surplus being provided in locations outside of the Marlborough Community Area. There is a requirement for the HAS to fulfil the requirements of Table 5.8 of the Core Strategy and provide the requisite level of housing in the Community Area.

Objective 3: Spatial Strategy

The respondent's object to the approach of objective 3 on the basis that the HSA is allowing for flexibility to under-deliver on housing in certain community areas, without any soundly based evidence for doing so. As demonstrated in the Marlborough Community Area, there is an under-supply of 34 dwellings. As the supporting text makes it clear that these are neither minimums or maximums, it necessarily follows that without a sound evidence base to do so, why should the HSA be promoting a lower level of development? Such an approach is contrary to the need in the Framework to "boost" housing land supply and the need for a plan-led system.

Soundness of the HSADPD

Aside from the lack of consistency with the Core Strategy and cited policies; the approach adopted by the HSA is also contrary to national guidance. The starting point for finding a plan sound is paragraph 182 of the Framework, which requires the following:

- Positively prepared – which requires inter alia for a plan to meet objectively assessed needs.
- Justified – most appropriate strategy, based on reasonable alternative.
- Effective
- Consistent with national policy

In terms of whether the Plan is positively prepared, given the shortfall in housing identified above, it is clear, that in the respect of the Marlborough CA remainder, it is not meeting its requirements, there should not be a shortfall, especially as the CS housing target is expressed as a minimum (see above commentary on Core Policy 2). Furthermore, the reliance placed on Neighbourhood Planning as a means of delivering housing creates considerable uncertainty. The Marlborough CA Topic Paper makes it clear that of the two Neighbourhood Plans in the Community Area, neither are anywhere near an advanced stage.

Effective?

For the reasons set out above, as the plan does not ensure the delivery of the housing requirement for the Marlborough CA Remainder over the plan period, it cannot be considered effective.

	<p>Consistent with National Policy?</p> <p>In addition to the concerns expressed above, regarding the general approach to automatically discounting additional allocations in this community area, the lack of a housing allocation is inconsistent with national policy. Both paragraph 55 of the Framework and Paragraph 001 or Rural Housing on the NPPG set out a principle broadly supporting new housing in rural areas. In the NPPG, there is the open recognition that “All settlements can play a role in delivering sustainable development in rural areas”</p> <p>By not making allocations in the community area, the Plan is failing Broad Hinton by not providing additional housing to support this rural community and the on-going vitality/viability of services and facilities in the village.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	715	Consultee R D Horton	Agent Mr Nathan McLoughlin Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125714	McLoughlin Planning Person ID: 404491	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Justified?</p> <p>It is considered that the Plan is not justified in respect of its approach to the Marlborough Community Area, when based on reasonable alternatives. The NPPG and Section 19 of the 2004 Act requires an LPA to carry out a sustainability appraisal. Guidance provided at paragraph 18 of the NPPG section titled “strategic environmental assessment and sustainability appraisal” sets out a requirement that the SA needs to: “Compare all reasonable alternatives”</p> <p>The emphasis here is the consideration of alternatives. As set out in paragraph 4.5 of the HSAP and the accompanying Topic Paper, it is clear that a decision has been made not to allocate housing sites in the EWHMA. However, this decision and an alternative strategy of making allocations in this area has not been considered by the SA. This is evidenced by the fact that the terms of reference are to discount those locations already discounted by the Council in the relevant Community Area topic paper. The SA does not appraise the validity of the decision of the Topic Paper.</p> <p>As a result, the plan has been prepared without a proper consideration of the alternatives.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	716	Consultee R D Horton	Agent Mr Nathan McLoughlin Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125714	McLoughlin Planning Person ID: 404491	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>THE PROPOSED HOUSING SITE</p> <p>In light of the above, there is a need to make an additional allocation in the Plan at Broad Hinton in conformity with the Core Strategy and Marlborough Community Area development policy. This site has previously been the subject of pre-application discussions between McLoughlin Planning and the Council as well as representations on the Informal HSADPD consultation in 2015. Whilst pre-app discussions were on the basis of a 5-year housing land supply, some of the technical considerations are still relevant in 2017 as they were in 2014. To this end, land at Broad Hinton is proposed for such development for a development of circa 40 units. The proposed development has a number of benefits in that:</p> <p>It provides a range of housing (both open market and affordable). Additional development in the village will support village vitality and the existing services and facilities there. In particular, the village school has a declining school roll and needs additional pupils. Development in landscape (AONB) terms is acceptable. The site is not subject to any ecological designations that would preclude its development. A proposed masterplan is attached, based on previous works undertaken by Linden Homes, this shows how the site could be developed for circa 40 dwellings. The respondents are disappointed following these previous efforts that the HSADPD does not allocate the site for some level of housing development, despite clear demonstrable benefits to the local community. In promoting the site for development the respondents have historically undertaken village wide consultation where there has been consistent support for new housing in the village to support existing services and facilities. The last consultation was undertaken in February 2015 and out of 87 responses received 72% were in favour of new housing and only 16% were directly opposed. As a result, the respondents would like to see the site allocated for housing development.</p>				
Attached files (Please see Objective)	4709226				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	717	Consultee MR MICHAEL DAVIS	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125847		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road Harnham Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The area is not set up to take another 840 houses full stop.			
Attached files (Please see Objective)		Scrap it			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	718	Consultee Mrs Louise Fowler	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125820	Person ID:	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	719	Consultee Mr Michael Fowler	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125864		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion.</p> <p>The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	720	Consultee Mrs MJ Harper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448213		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Reading today's Salisbury Journal I am amazed to see plans have been submitted to build 840 homes on land just off the Harnham/Netherhampton Roads between Inexcess and the Cattle Market.</p> <p>Can't think any member of Wiltshire Planning Officer has ever done a survey on the horrendous traffic problems in this location and extra homes would make it ten times worse you would know then extra traffic would cause problems just not suitable or right to build a housing estate that is proposed or any housing estate.</p> <p>Along the Harnham and Netherhampton roads the traffic day and night is continuous which increases on cattle market days everything goes along this route huge transporters, lorries, cars all forms of transport. The new large housing estate would cause even more congestion it's just madness to even think about it above all causing more misery for the people whose homes along the main road and getting across the roads would be so much more difficult than it is already.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	721	Consultee Mrs MJ Harper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448213	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Building any homes on this site would be madness, people who live on this main road even now tell me they can't open windows because of traffic noise and fumes it's just inevitable and extra traffic could cause problems.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	722	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		The revised settlement boundary for Hilperton. Policy 6.8, section A67, figure A49.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Hilperton Parish Council welcomes the exclusion of the playing field at Hilperton Primary School from within the settlement boundary and welcomes the continued exclusion from within the settlement boundary of 'The Nursery' site in Marsh Road. Please note that the council has grave concerns regarding the soundness of other parts of the draft plan and will be making a separate response to cover its concerns.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	723	Consultee Mr Tony Frost	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125881		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The boundaries and details are not accurate. The gardens of residential properties are included in potential development areas as are Farms and business/employment properties. Staff at the public consultations admitted that Land Registry records were not examined. Accurate representation of existing boundaries and usage. Consideration of how development will affect communities and environment.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	724	Consultee Mr and Mrs Michele and Peter Jeanes Person ID: 1125899	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Salisbury - Netherhampton Road				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is rare that I put down in writing my concerns about local or politics in general - not that I do not care but usually I think my thoughts will be dismissed but on this subject I am horrified that the "powers that be" do not have the memories or experience that my husband and I have about this area. We have both lived in the Salisbury area since the early 1960's and remember gentler times but we are forward looking and know more houses mean more cars, more people and more access to the council services. We have transport issues now. How we deal with these issues is essential for the well-being of the residents and the tourists of the area. The A303 past Stonehenge is a joke. We are on the radio every week for all the wrong reasons. A tunnel is not the answer. We need relief roads now before even contemplating more development. There are so many accidents on the roads. Every accident is an upset for a family not just a statistic.</p> <p>When we heard about the amount of houses proposed on Netherhampton road and Rowbarrow we were shocked because of what the plans did not mention and not what it did. This is NOT "not in my backyard" because in principal I am in favour of new housing - we all need to live somewhere but this area of our beautiful city Salisbury needs infrastructure whether that is the dismissed ring road to be on the agenda again (I was in favour of the "red route") or new roads, but we also need schools, doctors, dentists, the lists are endless. We must have a sensible discussion about this area. It floods. It has five rivers. It has a unique country feel which is why it is so loved by those of us who live here.</p> <p>My husband used to go to work at 6.30am and get home at 8.00pm before he retired in April. He was shocked when he saw the amount of traffic all around Salisbury at any time of the day. We only use our car when we have to and are lucky enough to be able to walk to town but there are many people who are not so fortunate - the elderly, the disabled and those who must park in the town because it will be quicker to drive in than to wait for the park and ride bus which has got caught in the traffic. We saw the chaos caused when the lorry wanted to turn around on the Harnham road a few years ago. The whole of Salisbury and the surrounding area ground to a halt for hours and that is not unusual. Please note the disruption being caused by the road works on the Newbridge Road bridge at the moment. I, as a pedestrian have had to change my walk to work! I will not even attempt to shop along the Southampton road on a Friday morning. We got caught there more than once when my elderly parents were alive and when we helped them to stay independent by taking them shopping but we had to go back in to the shop's restaurant with them rather than queue in the grid lock that is Salisbury's Southampton road.</p> <p>Apart from being a resident of this area I am also a doctors receptionist who lives near to the hospital and I hear all the ambulances that cannot get through the traffic now. What will happen if all these houses are built? Lives will be at risk and I am not usually so morbid. I know now the waiting times of the ambulances I am asked to order for our patients.</p> <p>Please get this right with the infrastructure. You have the chance now. Please do not throw your responsibility away. We, and you, have the answer and knowledge. Listen to us. Please.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	725	Consultee MR ALEX BROOKS Person ID: 1125928	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	section 3 point one plan objectives are flawed				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	1. The Plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by one quarter during the Plan period (and more after that) which exceeds the requirement for a five year supply. 2. The Plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion. 3. The Plan is not effective because WC's examination of 'windfall', which is expected to provide 60% of new housing, is grossly inadequate – comprising one page out of 4,500 pages of the Plan documents. 4. The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes build on brown land sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	726	Consultee Mrs R Read	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125964		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to you to object to the new housing plan application which includes housing on both sides of the Netherhampton Road. The whole idea has not been thought through properly, Harnham cannot cope with the traffic and amount of children needing to be schooled locally now – it will overwhelm us.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	727	Consultee Mrs R Read	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125964		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The worst part for myself and neighbours on my side of the Netherhampton Road is the great increase in the probability of being flooded again. If you build anything else on the flood plain, water dispersment will end up over the existing houses and having to try to get house insurance, even after the Environment Agency's work in the field behind Upper Street, is very difficult. I have been refused on several occasions because of my post code, even though my house narrowly avoided being flooded in 1990. Please rethink the plan – especially the houses to be built on the flat flood plain.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	728	Consultee Mrs R Read	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125964	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The whole idea has not been thought through properly, Harnham cannot cope with the traffic and amount of children needing to be schooled locally now – it will overwhelm us.</p> <p>We have very few facilities in Harnham now and this is just going to make our lives miserable and worrying.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	729	Consultee Mrs Carol Scott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125986	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		60 homes in Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Road networks within Durrington have not been investigated fully. The increase in traffic on the already congested Bulford Road, High Street has not been fully considered bearing in mind these routes give the new homes access to most facilities within Durrington. This will not mean 60 more cars – many homes have 2 cars = 120 more cars.</p> <p>Bearing in mind the Army Re-Basing programme there will be a huge increase in traffic on the A345 and particularly on Larkhill Road as Army personnel will be commuting between bases (on the A3028).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	730	Consultee Mrs Carol Scott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125986	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		60 homes in Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Drs surgeries are already at breaking point and with the present Cross Plains Surgery relocating to Larkhill in 2019 it gives its own set of problems together with a further increase in traffic using Larkhill Road to go to Larkhill for medical care. Possible increase in school provision needed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	731	Consultee Mrs Carol Scott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125986	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		60 homes in Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As regards national policy – Wiltshire Council has already complied in many ways but this particular area the housing for Army rebasing has not been counted. I do feel it should. The impact on the area will be enormous and should be monitored before even contemplating a further 60 houses.</p> <p>Please leave any further plans for development in Durrington on hold until the impact of Army Rebasing has been monitored for at least 2 years.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	732	Consultee Miss Kate Little Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Foreman Homes Ltd Person ID: 1125988		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		South Wiltshire Housing Market Area			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The indicative housing requirement for South Wiltshire HMA is identified as 10,420 for the period until 2026. This is a minimum requirement. Proposed allocations require significant works pre-planning with already identified infrastructure improvements needed pre-commencement. Larger scale sites, if found tenable, are expected to contribute to housing delivery only at the latter stages of the plan period. Such a delay to delivery is inflexible and potentially ineffective. Land at Rivermead, Braemore Road, Downton is immediately available. The contribution of 36 dwellings to land supply is both achievable and deliverable within the initial plan period, proposals have been found sustainable. The considerations of transport, education and biodiversity, those identified within this document as needing to be addressed in order for housing development to be accommodated, have been subject to the consideration of the Planning Inspectorate and found sound.				
Attached files (Please see Objective)	4709815				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	733	Consultee mr Colin Tagg Person ID: 1125387	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury Community Area Remainder		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Apparently the plan does not seem to agree with the Wiltshire Core Strategy: It will increase and not decrease the level of out commuting The proposal does not safeguard the environment the proposed development is outside the Settlement Boundary which according to 2.8 which is 'is with limited exceptions, not acceptable The Council's own survey clearly states that there is no economic growth in the village requiring additional housing The plan is inconsistent with the Council's own assessment of the housing need of Bratton which concludes a requirement for 8 houses and not 40 The Council's own assessment raises the issue of water and foul water being an existing problem in the village without any additional houses. On a number of previous occasions the Parish Council has stated that the site location is unsuitable for housing development. A single site development for 40 houses in Bratton is completely unreasonable considering the finite resources available in the village to support a substantial number of additional families, vehicles and social requirements. The village will not be able to absorb the excessive number of adults and children that a housing development of 40 houses will bring. The B 3098 passing through the central of the village which will be adjacent to the proposed development already carries an increasing number of vehicles between Westbury and Eddington. At peak hour these exceed 400 per hour as recorded by or Speed Watch team. An additional 40 houses with perhaps between two and three cars per family will dramatically increase congestion in the centre of the village. In a village where amenities such as the shop, doctors surgery, pre-school and primary school are already overburdened, the additional pressures created by the occupants of 40 additional houses would bring major disruption and pressures to the whole community. The Council should address the sustainability issues raised in the Atkins survey and consider smaller units to be integrated into the existing infrastructure reducing the impact on the village and its community and preserving the beauty of the White Horse ridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	N/A				

Comment ID:	734	Consultee mr Colin Tagg	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125387		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury Community Area Remainder		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Apparently the plan does not seem to agree with the Wiltshire Core Strategy: It will increase and not decrease the level of out commuting The proposal does not safeguard the environment the proposed development is outside the Settlement Boundary which according to 2.8 which is 'is with limited exceptions, not acceptable The Council's own survey clearly states that there is no economic growth in the village requiring additional housing The plan is inconsistent with the Council's own assessment of the housing need of Bratton which concludes a requirement for 8 houses and not 40 The Council's own assessment raises the issue of water and foul water being an existing problem in the village without any additional houses. On a number of previous occasions the Parish Council has stated that the site location is unsuitable for housing development. A single site development for 40 houses in Bratton is completely unreasonable considering the finite resources available in the village to support a substantial number of additional families, vehicles and social requirements. The village will not be able to absorb the excessive number of adults and children that a housing development of 40 houses will bring. The B 3098 passing through the central of the village which will be adjacent to the proposed development already carries an increasing number of vehicles between Westbury and Eddington. At peak hour these exceed 400 per hour as recorded by or Speed Watch team. An additional 40 houses with perhaps between two and three cars per family will dramatically increase congestion in the centre of the village. In a village where amenities such as the shop, doctors surgery, pre-school and primary school are already overburdened, the additional pressures created by the occupants of 40 additional houses would bring major disruption and pressures to the whole community. The Council should address the sustainability issues raised in the Atkins survey and consider smaller units to be integrated into the existing infrastructure reducing the impact on the village and its community and preserving the beauty of the White Horse ridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	N/A				

Comment ID:	742	Consultee Ms Jenny Rowe MRICS Estates Manager Wiltshire Council - Estates	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138634		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.58 Westbury Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site at J7, K7, J8 and K8 – site on corner of A350 Trowbridge Road and Bitham Park Suggest inclusion of this site in the settlement boundary Outline planning permission ref: 14/09262/OUT for the erection of 300 dwellings associated infrastructure, parking landscaping, public open space and a play area was granted at appeal on 05/06/16 with reserved matters approval 17/01643/REM granted on 18/09/17. We believe that this planning permission either has been implemented or will be very shortly. This would mean that the currently undeveloped site on the corner of the A350 Trowbridge Road and Bitham Park which is known as Gas House Farm would be surrounded on all sides by built development and would therefore relate more closely to the built environment than the open countryside and it's inclusion would not result in the extension of the built form of the settlement of Westbury We consider that the site covered by planning permission 14/09262/OUT should be included within the settlement boundary and following the inclusion of this, the land to the south and west lying adjacent to the roundabout should also be included.</p>				
Attached files (Please see Objective)	4750962				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	745	Consultee Mrs Joanna Throp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123135		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is envisaged that some 840 private dwellings, a 420 place infant school are to be built on this site which may be increased to approximately 1100 private dwellings if the proposed industrial site is not taken on board and developed . In that respect I do feel that this site is inappropriate for that amount of properties and I give my reasons for that.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	746	Consultee Mrs Joanna Throp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123135		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My first concern with this site being used for development of private dwellings etc. relate to the extra demand that will be placed on the main sewer system.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	747	Consultee Mrs Joanna Throp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123135		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding and sewerage management My fathers house backs onto the Salisbury flood defence embankment with water meadows beyond. About 4/5 years ago he was employed by SSE and working on various aspects of the electricity network. At this time there was an increase in prolonged heavy and sustained rainfall for over a month and over the winter as a whole, which resulted the two water meadow fields to the rear of his property being flooded to a height of approximately 6" from the top of the farmers fields barbed wire fence. This flooding encompassed the low- lying land along the Wylve valley and the Avon river valley through Braemore, Fordingbridge, Ringwood and Christchurch. During the early hours of one morning as a result of being recalled to work, my father was checking the various sub-station sites around Salisbury as a result of an Environment Agency Warning that, unless they could control the rising waters downstream near Fordingbridge, Salisbury had less than 8 hours before the whole of city became flooded. Several of our sites were well under water including Wessex Water Sewerage treatment works on Southampton Road with the water only 2" short (to any one who knows about electricity) of the 'Buzz Bars'. During this time my fathers property experienced a foul water blockage. He does posses a set of drain rods but this failed to clear the problem and he resorted to telephoning Wessex Water who duly sent out an operative to attempt to clear the issue. After a period of time he returned and informed me that the issue was not of my making. He said that the whole of Harnham was complete overwhelmed by not only surface water but with foul water also. This he blamed partially on the new homes built on the old Wellworthy site on Netherhampton Road together with an old sewer mains pipe that was not fit to accommodate the increased volume of raw sewage produced. Now we know that winters are getting wetter with prolonged periods of heavy rain. My objection to this site being used is that there is no plan that I am aware of that will accommodate the increase of foul water flow produced by some 1000+ people who are going to live in these properties. This does not take into account the school of over 400 pupils and staff or, workers who work on the proposed industrial site nearby.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	748	Consultee Mrs Joanna Throp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123135		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Roads infrastructure in and around Salisbury</p> <p>As you may or may not know, Salisbury is the central hub for a number of roads. They include, A30 from Shaftesbury, A36 from Warminster, A360 from Devizes, A345 from Amesbury, A338 from Swindon, A30 from Andover, A36 from Southampton, A338 from Bournemouth and the A354 from Blandford. Travellers have two alternatives in negotiating this central hub, either via Wilton Road from the west and the inner ring road or the A3094 via Park Wall, Netherhampton and Harnham. All traffic whether north/south or east/west has to negotiate New Bridge Road. On normal days when the schools are closed for holidays, Southampton Road regularly stacks up with traffic as far as the commencement of the Alderbury by pass. I have even known it go as far back as the commencement of the by pass some 4/5 miles out from the College roundabout when there has been an incident due to road works, a breakdown or worse. The latter problem also has a knock on and affects all the other roads feeding past the site of the incident. On the other roads into the central hub the A338 south backs up as far as Bodenham, the A30 to St Thomas's Bridge and beyond, the A30 to Wilton at the old whitening works, the A345 to the Old Castle and Devizes Road to Roman Road and beyond. When schools are in session the problems are even worse with the addition of parents driving their children to and from the school. Dealing with the A3094 traffic is usually static/slow moving from Harnham gyratory to Norfolk Road and beyond (depending on the time of day and year with school holidays etc.). With the addition of up to 1100 new properties with each property owning lets say one car, there will be a possible 1000+ extra car journeys a day, for school runs, shopping and work, that has to negotiate Harnham gyratory, and the A3094 through Harnham and Netherhampton to Park Wall traffic lights. This is going to put an unbearable strain on the entire road network through Salisbury. In relation to jobs there is almost full employment in Salisbury, which means that the occupants of any new development will have to travel by car to their work place. It was mentioned at a recent Harnham Association meeting that maybe the inner ring road and Southampton Road could be improved to accommodate more traffic. That only applies to the duel carriageway. What happens where the two ends of the ring roads meet the A36, A338 and the various other intersections along its route? For instant, think about Newbridge Road, which already operates to capacity at most times of the day. Before any more development takes place in or around Salisbury the entire roads network needs to be addressed and for that reason I object to any future development within and around Harnham or Netherhampton unless there can be direct access via a relief road from Salisbury to all the surrounding major roads.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	749	Consultee Mrs Joanna Throp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123135		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This will also have health implications to the residents from the increased toxic gasses produced by vehicles as they slowly crawl through the already congested roads putting an additional strain on our already beleaguered NHS. This at a time when the government is trying to reduce the emissions in towns and cities.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	750	Consultee Mrs Joanna Throp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123135		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition to this there is no public transport infrastructure in place for this development and knowing the general public as I do most will choose to drive into the city rather than walk (approximately 3km across Town Path) or wait for a bus service that fails to arrive for whatever reason. In addition to this there is no Park & Ride situated on the A3094. One only has to look at the abject failure of our 5 other sites around the city. They are completely underused and most of the time when I see them there are only a handful of passengers on board.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	751	Consultee Mrs Joanna Throp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1123135		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We do need housing as set out by the government, but they need to be relative to those who need and can afford them.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	752	Consultee Mr and Mrs Paul and Jennifer Francis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We believe that these sites [Upper Studley [near Church Lane and The Poplars), Southwick Court, and Elm Grove Farm] must be protected for the sake of retaining shared green space that is of significant benefit to many people and families locally. We take our dogs and children into these fields nearly every weekend, and losing these fields would be heart breaking for us.</p> <p>This green space is also home to many animals, mature trees, and mature hedges - all of which would be lost if developed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	753	Consultee Mr and Mrs Paul and Jennifer Francis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are also concerned about increased traffic off Silver Street Lane and surrounding streets due to the greater number of cars in the area because of the new homes. Our children attend Grove Primary - as do many others - and increased traffic in the area would present a safety hazard for them on their way to school.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	754	Consultee Mr and Mrs Paul and Jennifer Francis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Lastly, we are concerned that the additional housing will increase the population to a level that local services, including primary schools, emergency responders, local doctors, and the Trowbridge hospital, cannot cope with. We have seen several articles in the Wiltshire Times discussing the pressure that an increased population will put on these services.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	755	Consultee Mr and Mrs Paul and Jennifer Francis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We believe Wiltshire Council must investigate the redevelopment of existing brownfield sites first - for instance, the Bowyers site. Redevelopment of dangerous, derelict sites should be a priority, as it is beneficial to all residents, with little downside for those living nearby.</p> <p>Conversely, developing on these green spaces comes at a high cost - it will destroy the local villages, steal precious wild green space from all of us, increase traffic and associated dangers, and strain local services.</p> <p>We strongly urge Wiltshire Council to reject housing development on these sites, to consider brownfield development, and to look for towns/villages that have better infrastructure in place to support additional residents.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	756	Consultee Mr John Gibson Person ID: 1126905	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing in response to the above and ask that my views on this be considered prior to any approval. I am not a NIMBY and do not oppose development provided it is properly thought through and given due consideration. I am well aware that there is a need for housing for people of different needs and if there are insufficient brown field sites then green field sites will have to be used.</p> <p>It is envisaged that some 840 private dwellings, a 420 place infant school are to be built on this site which may be increased to approximately 1100 private dwellings if the proposed industrial site is not taken on board and developed. In that respect I do feel that this site is inappropriate for that amount of properties and I give my reasons for that.</p> <p>My second reason is the roads infrastructure in and around Salisbury.</p> <p>As you may or may not know, Salisbury is the central hub for a number of roads. They include, A30 from Shaftesbury, A36 from Warminster, A360 from Devizes, A345 from Amesbury, A338 from Swindon, A30 from Andover, A36 from Southampton, A338 from Bournemouth and the A354 from Blandford.</p> <p>Travellers have two alternatives in negotiating this central hub, either via Wilton Road from the west and the inner ring road or the A3094 via Park Wall, Netherhampton and Harnham. All traffic whether north/south or east/west has to negotiate New Bridge Road.</p> <p>On normal days when the schools are closed for holidays, Southampton Road regularly stacks up with traffic as far as the commencement of the Alderbury by pass. I have even known it go as far back as the commencement of the by pass some 4/5 miles out from the College roundabout when there has been an incident due to road works, a breakdown or worse. The latter problem also has a knock on and affects all the other roads feeding past the site of the incident. On the other roads into the central hub the A338 south backs up as far as Bodenham, the A30 to St Thomas's Bridge and beyond, the A30 to Wilton at the old whitening works, the A345 to the Old Castle and Devizes Road to Roman Road and beyond. When schools are in session the problems are even worse with the addition of parents driving their children to and from the school.</p> <p>Dealing with the A3094 traffic is usually static/slow moving from Hamham gyratory to Norfolk Road and beyond (depending on the time of day and year with school holidays etc.). With the addition of up to 1100 new properties with each property owning lets say one car, there will be a possible 1000+ extra car journeys a day, for school runs, shopping and work, that has to negotiate Harnham gyratory, and the A3094 through Hamham and Netherhampton to Park Wall traffic lights. This is going to put an unbearable strain on the entire road network through Salisbury. In relation to jobs there is almost full employment in Salisbury, which means that the occupants of any new development will have to travel by car to their work place.</p> <p>This will also have health implications to the residents from the increased toxic gasses produced by vehicles as they slowly crawl through the already congested roads putting an additional strain on our already beleaguered NHS. This at a time when the government is trying to reduce the emissions in towns and cities.</p> <p>In addition to this there is no public transport infrastructure in place for this development and knowing the general public as I do most will choose to drive into the city rather than walk (approximately 3km across Town Path) or wait for a bus service that fails to arrive for whatever reason. In</p>				

addition to this there is no Park & Ride situated on the A3094. One only has to look at the abject failure of our 5 other sites around the city. They are completely underused and most of the time when I see them there are only a handful of passengers on board. We were promised a Salisbury By Pass and work on this was about to commence in 1999 but thanks to the Labour Party and John Prescott who pulled the plug we are now no longer going to get it. On another note I recently saw that Chichester is about to get one, which only has the A27 running nearby. So before we start building these properties or assigning this plot to future building then we need to address the road system in and around Salisbury.

It was mentioned at a recent Harnham Association meeting that maybe the inner ring road and Southampton Road could be improved to accommodate more traffic. That only applies to the duel carriageway. What happens where the two ends of the ring roads meet the A36, A338 and the various other intersections along its route? For instant, think about Newbridge Road, which already operates to capacity at most times of the day. A saying 'you cannot get a quart into a pint pot' comes to mind.

Before any more development takes place in or around Salisbury the entire roads network needs to be addressed and for that reason I object to any future development within and around Harnham or Netherhampton unless there can be direct access via a relief road from Salisbury to all the surrounding major roads.

We do need housing as set out by the government, but they need to be relative to those who need and can afford them. As far as I can see the only people who are going to benefit from this land being designated as development land, are the landowners, who no doubt don't live anywhere near Salisbury or have to use our roads and the developers who will be selling 3/4 and 5 bedroom houses with rabbit hut patches of green lawn which they will call gardens and garage that no one can park their car in because it is to small for offers in excess of £350k +. The people who will suffer will be the residents of Hamham, their children, and their children's, children for years to come on the decisions that are made now.

I am prepared to change my views on this and accept housing in the Harnham/Netherhampton area provided that the previous points can be addressed and fully implemented.

I look forward to hearing from you in due course and hope that my views on this are taken into consideration.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	757	Consultee Mr John Gibson Person ID: 1126905	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing in response to the above and ask that my views on this be considered prior to any approval. I am not a NIMBY and do not oppose development provided it is properly thought through and given due consideration. I am well aware that there is a need for housing for people of different needs and if there are insufficient brown field sites then green field sites will have to be used.</p> <p>It is envisaged that some 840 private dwellings, a 420 place infant school are to be built on this site which may be increased to approximately 1100 private dwellings if the proposed industrial site is not taken on board and developed. In that respect I do feel that this site is inappropriate for that amount of properties and I give my reasons for that.</p> <p>I have lived at various properties in Salisbury since 1969 and at my current address for 15 years.</p> <p>My first concern with this site being used for development of private dwellings etc., relate to the extra demand that will be placed on the main sewer system. I say this for the following reason.</p> <p>My house backs onto the Salisbury flood defence embankment with water meadows beyond.</p> <p>About 4/5 years ago I was employed by SSE and working on various aspects of the electricity network. At this time there was an increase in prolonged heavy and sustained rainfall for over a month and over the winter as a whole, which resulted the two water meadow fields to the rear of my property being flooded to a height of approximately 6" from the top of the farmers fields barbed wire fence. This flooding encompassed the low-lying land along the Wylve valley and the Avon river valley through Braemore, Fordingbridge, Ringwood and Christchurch. You may ask what has this to do with my work, well during the early hours of one morning as a result of being recalled to work, I was checking the various sub-station sites around Salisbury as a result of an Environment Agency Warning that, unless they could control the rising waters downstream near Fordingbridge, Salisbury had less than 8 hours before the whole of city became flooded. Several of our sites were well under water including Wessex Water Sewerage treatment works on Southampton Road with the water only 2" short (to any one who knows about electricity) of the 'Buzz Bars'.</p> <p>During this time my property experienced a foul water blockage. I do possess a set of drain rods but this failed to clear the problem and I resorted to telephoning Wessex Water who duly sent out an operative to attempt to clear the issue. After a period of time he returned and informed me that the issue was not of my making. He said that the whole of Harnham was complete overwhelmed by not only surface water but with foul water also. This he blamed partially on the new homes built on the old Wellworthy site on Netherhampton Road together with an old sewer mains pipe that was not fit to accommodate the increased volume of raw sewage produced.</p> <p>Now we know that winters are getting wetter with prolonged periods of heavy rain. My objection to this site being used is that there is no plan that I am aware of that will accommodate the increase of foul water flow produced by some 1000+ people who are going to live in these properties. This does not take into account the school of over 400 pupils and staff children or, workers who work on the proposed industrial site nearby.</p> <p>The people who will suffer will be the residents of Hamham, their children, and their children's, children for years to come on the decisions that are made now.</p>				

	<p>I am prepared to change my views on this and accept housing in the Harnham/Netherhampton area provided that the previous points can be addressed and fully implemented.</p> <p>I look forward to hearing from you in due course and hope that my views on this are taken into consideration.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	758	Consultee Mr John Gibson Person ID: 1126905	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.3				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing in response to the above and ask that my views on this be considered prior to any approval. I am not a NIMBY and do not oppose development provided it is properly thought through and given due consideration. I am well aware that there is a need for housing for people of different needs and if there are insufficient brown field sites then green field sites will have to be used.</p> <p>It is envisaged that some 840 private dwellings, a 420 place infant school are to be built on this site which may be increased to approximately 1100 private dwellings if the proposed industrial site is not taken on board and developed. In that respect I do feel that this site is inappropriate for that amount of properties and I give my reasons for that.</p> <p>I have lived at various properties in Salisbury since 1969 and at my current address for 15 years.</p> <p>My first concern with this site being used for development of private dwellings etc., relate to the extra demand that will be placed on the main sewer system. I say this for the following reason.</p> <p>My house backs onto the Salisbury flood defence embankment with water meadows beyond.</p> <p>About 4/5 years ago I was employed by SSE and working on various aspects of the electricity network. At this time there was an increase in prolonged heavy and sustained rainfall for over a month and over the winter as a whole, which resulted the two water meadow fields to the rear of my property being flooded to a height of approximately 6" from the top of the farmers fields barbed wire fence. This flooding encompassed the low-lying land along the Wylve valley and the Avon river valley through Braemore, Fordingbridge, Ringwood and Christchurch. You may ask what has this to do with my work, well during the early hours of one morning as a result of being recalled to work, I was checking the various sub-station sites around Salisbury as a result of an Environment Agency Warning that, unless they could control the rising waters downstream near Fordingbridge, Salisbury had less than 8 hours before the whole of city became flooded. Several of our sites were well under water including Wessex Water Sewerage treatment works on Southampton Road with the water only 2" short (to any one who knows about electricity) of the 'Buzz Bars'.</p> <p>During this time my property experienced a foul water blockage. I do possess a set of drain rods but this failed to clear the problem and I resorted to telephoning Wessex Water who duly sent out an operative to attempt to clear the issue. After a period of time he returned and informed me that the issue was not of my making. He said that the whole of Harnham was complete overwhelmed by not only surface water but with foul water also. This he blamed partially on the new homes built on the old Wellworthy site on Netherhampton Road together with an old sewer mains pipe that was not fit to accommodate the increased volume of raw sewage produced.</p> <p>Now we know that winters are getting wetter with prolonged periods of heavy rain. My objection to this site being used is that there is no plan that I am aware of that will accommodate the increase of foul water flow produced by some 1000+ people who are going to live in these properties. This does not take into account the school of over 400 pupils and staff children or, workers who work on the proposed industrial site nearby.</p> <p>The people who will suffer will be the residents of Hamham, their children, and their children's, children for years to come on the decisions that are made now.</p>				

	<p>I am prepared to change my views on this and accept housing in the Harnham/Netherhampton area provided that the previous points can be addressed and fully implemented.</p> <p>I look forward to hearing from you in due course and hope that my views on this are taken into consideration.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	759	Consultee Mr John Gibson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is going to put an unbearable strain on the entire road network through Salisbury. In relation to jobs there is almost full employment in Salisbury, which means that the occupants of any new development will have to travel by car to their work place.</p> <p>This will also have health implications to the residents from the increased toxic gasses produced by vehicles as they slowly crawl through the already congested roads putting an additional strain on our already beleaguered NHS. This at a time when the government is trying to reduce the emissions in towns and cities.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	760	Consultee Mr Drue Steele	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126008		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Crossways, Bratton		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am a local Chartered Architectural Technologist and this Housing Site Allocation Plan is unsound due to the following:</p> <p>The proposed development of new homes to the West of Bratton presents a significant threat to and intrusion into the local rural landscape and will present a totally unnecessary visual eyesore and disrupt local transportation and services.</p> <p>The proposals represent significant over construction and extension beyond the development boundary of Bratton and will result in almost 13% village dwelling growth over the last 15 years when using correct data to assess the current size and density of Bratton. The surcharge in growth to such a small village within a protected greenbelt landscape and conservation area is simply unacceptable.</p> <p>It is unsurprising given the above and given the over burdening strain that any development would force upon the local road networks, local traffic safety, local rural amenity, and local services, that previous applications to the same effect have been rejected not once, but twice, and that the current plan has received the unanimous rebuttal of the Parish Council and those living within and around the village.</p> <p>Given such clear and unarguable reasons against such proposals, no Community Infrastructure Levy (see: bribe) shall justify such a ruinous development.</p> <p>The near by town of Westbury is perfectly suited for new build, high density housing and expansion and provides better local transport to near by places of work; Trowbridge, Bradford and Bath and has the infrastructure and organisational capability to support such new development.</p> <p>For the reasons outlined above, the developments should clearly be denied indefinitely.</p> <p>New build housing should be proposed in and around Westbury, Trowbridge and other towns - not villages. Both of which have the infrastructure and organisational capability to grow and accommodate new dwellings.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		If necessary, I will happily testify my previous reasoning against such proposals for clarity.			

Comment ID:	761	Consultee Mr John Gibson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We do need housing as set out by the government, but they need to be relative to those who need and can afford them. As far as I can see the only people who are going to benefit from this land being designated as development land are the landowners, who no doubt don't live anywhere near Salisbury or have to use our roads and the developers who will be selling 3/4 & 5 bedroom houses with rabbit hut patches of green lawn which they will call gardens and garage that no one can park their car in because it is too small for offers in excess of £350k +.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	762	Consultee Chris and Janet Rodzik	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126050	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to register my anger, frustration and rejection at Wiltshire Councils planning proposal to develop the green field sites 263 & 297 Hilperton Gap, for housing before prioritising brown field sites first.</p> <p>The ex-Bowyer site next to Trowbridge station must take priority. This site would provide anything up to 200 dwellings. These would most probably be flats & town houses which, given the current high house prices would provide a more affordable home ownership option to young first time buyers.</p> <p>The abandoned / unused site on the corner of Wiltshire Drive & Bradley Road has laid dormant for the past two years or more and should be considered before any green field site. Wiltshire Council - think again! IGNORE developers wishes and put your residents wishes FIRST.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	763	Consultee Chris and Janet Rodzik	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126050	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Hilperton Gap sites 263 & 297 are frequently used by walkers and dog owners. I use this area for regular walking exercise and always meet dog owners doing the same. It's important to keep a recreational area as there are none close by. Developing the Hilperton Gap would further extend the urban sprawl expanding Trowbridges already large housing footprint.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	764	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed site allocation in Para H2.14 is outside the revised settlement boundary for Bratton as shown on document WHSA PSCONS01A. It would be detrimental to the village of Bratton to develop outside this settlement boundary.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	765	Consultee Mr Richard Hocking	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123501		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>These comments apply to to the combined effect of policies H3.1, H3.3 and H3.4 which propose a total of 840 homes in Harnham, and which will substantially increase road traffic.</p> <p>These policies are not positively prepared because the infrastructure requirements have not been assessed and the resulting traffic congestion would be inconsistent with achieving sustainable development. The policies will not be effective as they will negatively affect strategic economic and health priorities, and they cannot be justified and shown to be appropriate, without assessing the transport infrastructure requirements.</p> <p>My fundamental point is that roads in the Harnham area are already at or close to full capacity, with lengthy queues forming at peak times. Once a road network reaches full capacity adding further significant demand, or any restrictions will dramatically increase queueing times. For example, breakdowns, accidents or roadworks in the vicinity of the Harnham Gyratory, Newbridge Road, or the College Roundabout, have resulted in massive traffic jams, stretching back along the A36 dual carriageway, on the A338 towards Bodenham, and on the Oddstock Road back to Salisbury District Hospital.</p> <p>Most people in these new developments will need to drive to work through Salisbury or Wilton significantly increasing traffic flows. Harnham is also poorly served with shops, secondary schools, and leisure facilities. This will inevitably generate further traffic.</p> <p>The consequences of significantly increased traffic queues are: damage to the local economy as time is wasted unproductively queueing, missed appointments, increased stress with negative implications for health, and increased pollution for those living near these roads.</p> <p>If the housing site allocation plan is approved without a detailed, costed plan for improving the road network, then we are most unlikely to see major improvements to the road network. This will make Salisbury an increasingly unattractive city in which to live and do business.</p> <p>For 30 years Salisbury has seen increased development but no major improvements to its road infrastructure. This approach of building and ignoring the consequences is not sustainable development.</p> <p>A detailed, fully costed and resourced transport development plan must be developed for Harnham. Policies H3.1, H3.3 and H3.4 should only be approved after this has been done.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	766	Consultee Mr Richard Hocking	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123501		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>These comments apply to to the combined effect of policies H3.1, H3.3 and H3.4 which propose a total of 840 homes in Harnham, and which will substantially increase road traffic.</p> <p>These policies are not positively prepared because the infrastructure requirements have not been assessed and the resulting traffic congestion would be inconsistent with achieving sustainable development. The policies will not be effective as they will negatively affect strategic economic and health priorities, and they cannot be justified and shown to be appropriate, without assessing the transport infrastructure requirements.</p> <p>My fundamental point is that roads in the Harnham area are already at or close to full capacity, with lengthy queues forming at peak times. Once a road network reaches full capacity adding further significant demand, or any restrictions will dramatically increase queueing times. For example, breakdowns, accidents or roadworks in the vicinity of the Harnham Gyratory, Newbridge Road, or the College Roundabout, have resulted in massive traffic jams, stretching back along the A36 dual carriageway, on the A338 towards Bodenham, and on the Oddstock Road back to Salisbury District Hospital.</p> <p>Most people in these new developments will need to drive to work through Salisbury or Wilton significantly increasing traffic flows. Harnham is also poorly served with shops, secondary schools, and leisure facilities. This will inevitably generate further traffic.</p> <p>The consequences of significantly increased traffic queues are: damage to the local economy as time is wasted unproductively queueing, missed appointments, increased stress with negative implications for health, and increased pollution for those living near these roads.</p> <p>If the housing site allocation plan is approved without a detailed, costed plan for improving the road network, then we are most unlikely to see major improvements to the road network. This will make Salisbury an increasingly unattractive city in which to live and do business.</p> <p>For 30 years Salisbury has seen increased development but no major improvements to its road infrastructure. This approach of building and ignoring the consequences is not sustainable development.</p> <p>A detailed, fully costed and resourced transport development plan must be developed for Harnham. Policies H3.1, H3.3 and H3.4 should only be approved after this has been done.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	767	Consultee Mr Richard Hocking	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1123501		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>These comments apply to to the combined effect of policies H3.1, H3.3 and H3.4 which propose a total of 840 homes in Harnham, and which will substantially increase road traffic.</p> <p>These policies are not positively prepared because the infrastructure requirements have not been assessed and the resulting traffic congestion would be inconsistent with achieving sustainable development. The policies will not be effective as they will negatively affect strategic economic and health priorities, and they cannot be justified and shown to be appropriate, without assessing the transport infrastructure requirements.</p> <p>My fundamental point is that roads in the Harnham area are already at or close to full capacity, with lengthy queues forming at peak times. Once a road network reaches full capacity adding further significant demand, or any restrictions will dramatically increase queueing times. For example, breakdowns, accidents or roadworks in the vicinity of the Harnham Gyratory, Newbridge Road, or the College Roundabout, have resulted in massive traffic jams, stretching back along the A36 dual carriageway, on the A338 towards Bodenham, and on the Oddstock Road back to Salisbury District Hospital.</p> <p>Most people in these new developments will need to drive to work through Salisbury or Wilton significantly increasing traffic flows. Harnham is also poorly served with shops, secondary schools, and leisure facilities. This will inevitably generate further traffic.</p> <p>The consequences of significantly increased traffic queues are: damage to the local economy as time is wasted unproductively queueing, missed appointments, increased stress with negative implications for health, and increased pollution for those living near these roads.</p> <p>If the housing site allocation plan is approved without a detailed, costed plan for improving the road network, then we are most unlikely to see major improvements to the road network. This will make Salisbury an increasingly unattractive city in which to live and do business.</p> <p>For 30 years Salisbury has seen increased development but no major improvements to its road infrastructure. This approach of building and ignoring the consequences is not sustainable development.</p> <p>A detailed, fully costed and resourced transport development plan must be developed for Harnham. Policies H3.1, H3.3 and H3.4 should only be approved after this has been done.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	768	Consultee Mrs Tina Jones Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Cricklade Town Council Person ID: 1051839		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other: Community Area Topic Paper - Royal Wootton Bassett and Cricklade		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Settlement Boundary Review : Points of Agreement It can be seen that the DCNP has already included some of the changes proposed by WC, such as now including within the boundary the following sites: Stockham Gardens (map reference L7), Spital Lane(K7), The Leisure Centre (F5&F6), T. James Motors(E5&F5) and Abingdon Court(K6). In addition there are a number of minor changes regarding private gardens which we are in agreement with.				
Attached files (Please see Objective)	4709938				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The process of developing a Neighbourhood Plan for Cricklade continues and it is imperative that whenever the oral examination takes place, the inspector is fully aware of the most up to date information about the stage reached in the NP process				

Comment ID:	769	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It's also imperative that the physical alignment of historic footpaths BRAT24 and BRAT25 is maintained, rather than being 'facilitated through' any development that may take place. This should be more precisely specified in the document wording.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	770	Consultee Mrs Mary Hocking	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126040		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1`		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I travel frequently between my home in East Harnham and Wilton, and this short journey often takes half an hour or more. It is obvious to me that Netherhampton road, Newbridge Road and the Harnham Gyratory are already overloaded with traffic. It makes no sense to build more homes in Harnham without major improvements to the roads and junctions. We need a proper plan for improving the roads before accepting these proposals for development.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	771	Consultee Mrs Mary Hocking	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126040		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I travel frequently between my home in East Harnham and Wilton, and this short journey often takes half an hour or more. It is obvious to me that Netherhampton road, Newbridge Road and the Harnham Gyratory are already overloaded with traffic. It makes no sense to build more homes in Harnham without major improvements to the roads and junctions. We need a proper plan for improving the roads before accepting these proposals for development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	772	Consultee Mrs Mary Hocking	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126040		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I travel frequently between my home in East Harnham and Wilton, and this short journey often takes half an hour or more. It is obvious to me that Netherhampton road, Newbridge Road and the Harnham Gyratory are already overloaded with traffic. It makes no sense to build more homes in Harnham without major improvements to the roads and junctions. We need a proper plan for improving the roads before accepting these proposals for development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	773	Consultee Andrew Fleming Associates Ltd	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124863	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Figure A.6 Proposed amendments to the settlement boundary for Worton	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Worton is a “large village” as identified in the Wiltshire Core Strategy (WCS); Core Policy CP1 “Settlement Strategy “. The village has a good range of community facilities and local businesses and is assessed in the WCS as suitable for some sustainable growth. However, in the East Wiltshire HMA there has been a blanket exclusion of new site allocations in large villages which is loosely justified because of the strength and supply overall in the HMA. The proposed village settlement boundary has been drawn tightly around the existing built area and provides few opportunities for future development.</p> <p>Almost all infilling has been taken up within the previous decade(s) within Worton and consequently the village has had a low level of housing completions and commitments in recent years and there are now few suitable and available housing sites for sustaining the Village up to 2026. Whilst a Neighbourhood Plan is in preparation it is not sufficiently advanced to have any materiality and in the absence of a submitted draft Neighbourhood Plan, Wiltshire Council are required to ensure that suitable housing sites are available.</p> <p>This blanket approach is counter-intuitive to the aims of the Core Strategy Strategic Objective 3, bullet point 4 which seeks, as a key outcome: “The flexible approach will have allowed the council, for example through the preparation of the Site Allocations DPD ...and to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach”</p> <p>Both paragraph 55 of the Framework and Paragraph 001 or Rural Housing on the NPPG set out a principle broadly supporting new housing in rural areas. In the NPPG, there is the open recognition that “All settlements can play a role in delivering sustainable development in rural areas”</p> <p>There is no evidence that any site survey analysis has been carried out by Wiltshire Council of available development sites in Worton. By not making allocations in the community area, the Plan is failing by not providing additional housing to support this rural community and the on-going vitality/viability of services and facilities in the village.</p> <p>Settlement boundary proposal should be adjusted to include land adjacent to the existing settlement</p> <p>The. Settlement boundary proposal should be adjusted to include land adjacent to the existing settlement boundary to the west to allow some sustainable development within the plan period. To include site in the ownership of Worton and Marston Charities shown in the attached submitted document. This will allow the additional of around 8 houses to meet local housing needs,</p>				
Attached files (Please see Objective)	4709975				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	774	Consultee Ms Margaret Willmot Person ID: 378123	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Paragraph 2.17, Table 2.3 and elsewhere				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The Wiltshire Core Strategy (WCS) is "a strategy that is based on an understanding of the Community Areas in Wiltshire" (WCS, heading on p.9) and Community Area Boards "provide opportunities for people to help shape the future of their local area" (WCS, para 1.15). Para 5.112 of the WCS identifies that one of the specific issues which needs to be addressed in relation to Salisbury Community Area is that "the administrative boundaries around the city have led to a large proportion of the development allocations in this Core Strategy being located outside of the boundary of the city. Some are, for example, located on new greenfield sites in the adjoining parishes which are within the Southern Wiltshire and Wilton Community Areas. These allocations are, however, considered to contribute towards the requirement for housing and employment for Salisbury and are included within this Salisbury Area Strategy".</p> <p>There has been no attempt to quantify or address this issue, which calls into question the effectiveness of the Core Strategy allocations and particularly the additional allocations for Salisbury proposed in the draft Housing Site Allocations plan, since these largely fall outside Salisbury Community Area.</p> <p>The Wiltshire Core Strategy does touch on the point that a 'settlement' can potentially extend across more than one community area - in para 5.2 : "... there are places, notably Chippenham, Salisbury and Trowbridge, where the continuous extent of their existing urban areas and/or proposed urban extensions, fall within more than one Community Area. In such circumstances, the Community Area in which the majority of the settlement sits includes the policy relating to that settlement in full."</p> <p>However, the situation around Salisbury is that large parts of the new housing fall outside Salisbury Community Area, and not all this housing is continuous with Salisbury. Longhedge for example has some 673 houses outstanding at April 2016 [source Housing Land Supply Statement Update April 2016], this is in addition to new housing already built at Old Sarum. The settlement boundary around Old Sarum does not touch Salisbury's settlement boundary and is contained within Laverstock & Ford parish and the Southern Community Area. Housing being built at Longhedge does not appear to be within any settlement boundary (see also representation re Appendix A Settlement Boundary).</p> <p>The housing proposed at Netherhampton Road is not in Salisbury parish or Community Area, but in Netherhampton parish and South West Wiltshire Community Area.</p> <p>There are no formal links between the Community Area boards, and many difficulties in organising Neighbourhood Planning across multiple parishes.</p> <p>The draft Wiltshire Housing Site Allocations plan is unsound because it does not give due attention to the cross boundary issues which affect the development of the Settlement of Salisbury. There needs to be effective joint working on cross-boundary strategic priorities (e.g. Transport, Green Infrastructure, other infrastructure needed for development) and Wiltshire Council do not appear to have put in place the structures and mechanisms to facilitate effective cross-boundary working.</p> <p>To highlight the extent of the problem, the indicative housing requirements for the Community Areas of Salisbury and Wilton should not be combined in Table 2.3, and if "Salisbury's" housing is in Southern or South Western Community Areas this needs to be made explicit, as does the mechanism for addressing the problems which this raises.</p>			

	There needs to be an acknowledgement of the actual community areas where it is proposed to site the 'Salisbury' housing allocation, wherever this is mentioned, and there should be an additional section to explain how cross-boundary working to ensure strategic issues which affect the Salisbury Settlement area are to be taken into account.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To explain the complexities of cross-boundary working and how they constrain effective sustainable development around Salisbury

Comment ID:	775	Consultee Mrs Anita Goddard	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126092		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 Netherhampton Road Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>My comments refer only to the proposal on the North side (city side of Netherhampton Road). I consider the allocation of land on the North side unsound on the basis of impact on the Cathedral view. Aesthetics of how any housing development will impact on the land here, with Waddon Farm being a natural boundary. I am concerned about any potential flooding. I am concerned about the increased level of traffic this side of the city.</p> <p>Removal of the land on the North side of this site would go some way to making the allocation plan sound. It is important for so many reasons to protect green spaces such as this, this green space nestles alongside the water meadows, provides a stunning, historical view of the cathedral, for which Salisbury is famous for its cathedral views. This land on the north side should be protected and perhaps nurtured as an environmental asset for the area.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	776	Consultee Andrew Fleming Associates Ltd	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124863	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Figure/Table A.4 Proposed amendments to the settlement boundary for Rowde	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Rowde is a “large village” as identified in the Wiltshire Core Strategy (WCS); Core Policy CP1 “Settlement Strategy “. The village has a good range of community facilities and local businesses and is assessed in the WCS as suitable for some sustainable growth and at present has no Neighbourhood Plan Area submitted or approved.</p> <p>In the East Wiltshire HMA there has been a blanket exclusion of new site allocations in large villages which is loosely justified because of the strength and supply overall in the HMA. The proposed village settlement boundary for Rowde has been drawn tightly around the existing built area and provides few opportunities for future development. Almost all infilling has been taken up within the previous decade(s) within Rowde and consequently the village has had a low level of housing completions and commitments since 2006 (estimated at about 8 -10 dwellings in total) and there are now few suitable and available housing sites for sustaining Rowde up to 2026. In the absence of a Neighbourhood Plan Wiltshire Council are required to ensure that suitable housing sites are available.</p> <p>This blanket approach is counter-intuitive to the aims of the Core Strategy Strategic Objective 3, bullet point 4 which seeks, as a key outcome: “The flexible approach will have allowed the council, for example through the preparation of the Site Allocations DPD ...and to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach”</p> <p>Both paragraph 55 of the Framework and Paragraph 001 or Rural Housing on the NPPG set out a principle broadly supporting new housing in rural areas. In the NPPG, there is the open recognition that “All settlements can play a role in delivering sustainable development in rural areas”</p> <p>By not making allocations in the community area, the Plan is failing by not providing additional housing to support this rural community and the on-going vitality/viability of services and facilities in the village.</p> <p>The draft settlement boundary proposal should be adjusted to include land adjacent to the existing settlement to the west to allow some sustainable development within the plan period. The site proposed is shown in the attached plan and was formerly part of Malthouse Farm until farming ceased in about 2013. This no longer forms part of an existing established farm holding and has a good physical relationship to existing development and within 200m of all community facilities except the primary school which is located 500m east of the site. To include this site will allow the addition of around 5 houses to meet local housing needs,</p>				
Attached files (Please see Objective)	4710030				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	777	Consultee Mr Ian Tomes	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126103		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I believe the site is unsound because the site is not big enough to gain the necessary infrastructure needed, for what is basically a new village. Therefore, it should be of a smaller scale, minimising effect on traffic. I believe the northern side should not be developed at all because of its setting with the cathedral, the close proximity to the flood plain and because there needs to be a strategic gap between Harnham and Netherhampton and the logical place for this is to start at Waldrons Farm. There are serious concerns around traffic in Harnham now, and any increase in traffic will only be detrimental to those who live along the roads in Harnham and Netherhaption and Quidhampton. To make this allocation plan sound, I believe the following should be done. No development on the northern side and a much reduced in numbers development along the southern side.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	778	Consultee Andrew Fleming Associates Ltd	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124863	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table	Table A.4 and related west boundary of Rowde	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The draft consultation delineates some of the redundant agricultural buildings to the west of the village at Malthouse Farm and excludes them from the latest pre-consultation draft. The Community Topic Paper for Devizes states that the proposed boundary revision is to : “Amend boundary to remove built employment development at the edge of the large village and to exclude curtilages of properties that more closely relate to the countryside. There is no evidence that any site survey analysis has been carried out by Wiltshire Council of this site in Rowde. The change to the boundary also appears to be a desk top site analysis and fails to recognise that the farm buildings are both redundant and severed from an agricultural holding and most of the larger steel frames storage barns not viable or suitable for employment purposes or other alternative practical or economic uses. Most of the buildings are in poor condition and require extensive repairs and alterations for business use. Furthermore, the scale of the buildings if used for employment or business purposes would generate considerable traffic generation much greater than generated from residential development and conversion; and will have a substantial and adverse impact on the local highway network. Adjust the proposed draft boundary to include the redundant farm buildings within the settlement boundary.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	779	Consultee Ms Margaret Willmot Person ID: 378123	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure A.69		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed revised settlement boundary for Salisbury seems to include the housing which has been built at Old Sarum. IF this is part of the settlement of Salisbury this conflicts with paragraph 5.2 of the Wiltshire Core Strategy where it is stated that : "Where Principal Settlements and Market Towns are referred to, it should be noted that reference is being made to their continuous urban areas that may be within more than one parish area. Similarly, there are places, notably Chippenham, Salisbury and Trowbridge, where the continuous extent of their existing urban areas and/ or proposed urban extensions, fall within more than one Community Area."</p> <p>This area is clearly not continuous with Salisbury so fails to comply with the above.</p> <p>IF this is part of the 'settlement' of Laverstock and Ford Parish, in the Southern Community Area, it fails to comply with the general rule in the Wiltshire Core strategy that a 'small village' (which is what Laverstock and Ford is defined as) will not have a settlement boundary - see Wiltshire Core Strategy appendix F.</p> <p>There is no explanation given as to why the Longhedge strategic housing allocation which is now being built alongside Old Sarum housing, albeit with no links to it, is not included within a settlement boundary when Old Sarum housing is included.</p> <p>Clarification is needed over whether Old Sarum forms part of the Settlement of Salisbury, and the Core Strategy definition which relates to continuous urban areas will need amendment if it does.</p> <p>Clarification is also required re the position of the development of Longhedge and whether the Settlement Boundary should encompass this development.</p> <p>The difficulties regarding cross boundary issues for a settlement which crosses multiple area boards and parishes are referred to in a separate representation and this matter also needs to be addressed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Complexities of Salisbury's settlement boundary in relation to issues which cross multiple community areas need to be properly and fully addressed.				

Comment ID:	780	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.66-4.67			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There are policies in place within the NPPF to prioritise the development of brown field sites, paragraph 111 says that “Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.”</p> <p>There are also policies to protect the re-development of high quality agricultural land. The SA indicates that part of site S1028 is unclassified but also a mixture of both Grade 3a and Grade 2 Agricultural Land, which are among the classifications defined as ‘best and most versatile’. The NPPF indicates at para 112 that “Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”</p> <p>In light of these policies, there needs to be further explanation regarding the delays in bringing forward housing in Central Car Park and at Churchfields, specifically on the Engine Shed site. Both of these are owned by Wiltshire Council and efforts should be made to bring these sites forward in preference to less sustainable greenfield sites on the edge of the City.</p> <p>Time frames for redevelopment of brown field strategic sites are needed, to include detailed explanations of the rationale for any delays in bringing these forward.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	781	Consultee Mr David Wingrove Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Ashton Keynes Parish Council Person ID: 1126124		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		The Whole Plan			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Ashton Keynes Parish Council supports this document in general. In particular, it supports: Section 5 - Housing Site Allocations North and West Wiltshire Housing Market Area Policy H2				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	782	Consultee Andrew Fleming Associates Ltd	Agent mr david stirling Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1124863	Simul Consultants Ltd Person ID: 549147	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Topic Paper 4 Developing Plan Proposals			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Draft Wiltshire Site Allocation Plan makes no provision for Self or Custom Build properties. The Council has a responsibility for keeping a self and custom house building register as set out in Section 1 of the Self-build and Custom Housing Act 2015. The National Policy Planning Guidance (NPPG) states that this should form a key part of a relevant authority's evidence base of demand for this type of housing and further in the NPPF to provide a wide choice of homes its its housing allocations.</p> <p>There is no statement in the proposals which support self build and how this has been allowed for the draft plan nor in the development of the proposals. By implication self build or custom build for a group of dwellings are only likely to be delivered through small sites rather than a large housing site allocation. This will require some space within existing large villages rather than a tightly drawn restrictive boundary and an acknowledgement that they can also be accommodated with small settlements which can accommodate infill (which is accepted can be up to 4 dwellings).</p> <p>Self Build can contribute to the local vitality of the community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	783	Consultee Ms Helen Down	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Figure 5.19 H3.1 South of Netherhampton Road, Salisbury, Figure 5.21 H3.3 North of Netherhampton Road, Salisbury, and Figure 5.22 H3.4 Land at Rowbarrow, Salisbury	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The main reason I consider the plan unsound is due to the additional impact that extra vehicles from a development of this size, particularly that proposed on Netherhampton Road, would have on the existing road infrastructure. They would be forced to travel mainly along the A3094 towards the Harnham gyratory and Newbridge Road to get to other parts of the city or further a field. It only takes a jack-knifed lorry to bring those roads to a complete standstill for several hours, as happened almost two years ago. The economic cost and frustration would be immense.</p> <p>More recently a pedestrian was killed on the Netherhampton Road after being struck by a cattle-truck. Overloading the roads in this area would cause potentially detrimental safety risks for all road users especially at peak time on school runs.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	784	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to make an official objection to the inclusion of site 3565 in the Trowbridge Site Allocation plan. I intend to organise my objection into a number of factually based and referenced categories. I shall make reference to documents and illustrations in the course of my objection and quote from them. Full copies and/or supporting material to which I make reference will be included in annotated appendices at the conclusion of this document. This is not meant to be a full and complete documented objection, as a number of my neighbours have raised a rich and varied collection of arguments, but just a statement of the facts that I have been able to gather in support of specific arguments.</p> <p>Premise I intend to prove through evidence-based arguments that the proposal to build on land designated as 3565 is flawed, under-researched and in one specific instance illegal. I intend to divide my argument into the following categories:</p> <ul style="list-style-type: none"> Environmental Historical Access Ecological Unacceptable peril Infrastructure Unwarranted destruction of green space Procedural anomalies Economic hardship <p>Although evidence for one category will be referenced in another if applicable.</p> <p>Environmental Many strong arguments exist that this site holds an important place in the regional environment. In addition to acting as an area of great natural beauty used by locals with the historical blessing of the landowner it acts as a safety valve for the egress of the Lambrok Stream. In the proposal document there is a recognition that a part of the land acts as a floodplain.</p> <p>The proposal assumes that this can be easily worked around, and that an engineering 'fix' is possible. This may well be the case, however, I intend to present evidence demonstrating beyond doubt that such a 'fix' would not be cost-effective and would wantonly destroy elements of the natural and historical landscape in order to build unsustainable housing on an unsuitable site.</p>				

1. The extent of the floodplain and seasonal flooding is greater than that notified by or to the Environment Agency. The photograph below evidences this assertion :

[refer to photographs within attached representation documents]

In appendix A I attach further photographic evidence of the spread of the floodwater.

The notified height differential between this point and the lowest point on the floodplain is approximately two metres. Given the spread of the flood water beyond the notified level 2 & 3 floodplain this is clearly a far greater risk to property and the public than has heretofore been recognised or acknowledged officially.

2. Surface water from The Sandringham Road, Windsor Drive, Holyrood Close, Balmoral Road and Boundary walk area currently drains into the ditch connecting the Lambrok. I have suspicions that some surface water drainage from Silver Street Lane also enters the system at this point.

Currently, during times of extended rainfall, this system backs up and drains in Sandringham Road cease to drain and begin to expel water from the system into roads and gardens. Any additional water entering the system, whether it be from site 3565 or from further upstream will exacerbate this situation. Whilst I am aware that any scheme must take this into consideration, it must be nigh on impossible to guarantee that all additional drainage including runoff from additional impermeable surfaces such as concrete and tarmac is dealt with.

Further complicating this situation is the underlying geology of the area, most notably the solid clay substrate. I understand that current regulations require a minimum of one metre of unsaturated soil for any soak away, and that any additional heavy flow be kept separate from current drainage by means of storage ponds. Whilst such a solution may be possible it underlines the fundamental unsuitability of the site and raises questions about its sustainability in relation to the current built form. Appendix F contains photographs taken on the day in which the drainage pits were dug (18/07/17) and pictures of the same pits two days later (20/07/17). These images clearly show that very little if any soak-away has occurred, fractionally lower water levels could be at least partly due to evaporation given the dates and prevailing weather conditions. They also clearly demonstrate the quantity of clay in the underlying earth.

3. Site 3565 is also home to post-medieval earthworks. I will address their value below, but their nature is pertinent to this discussion. Their function, going back many hundreds of years, was to trap and hold surface water. The fact that these constructs were successful for many years without the addition of any additional material such as stone, brick or concrete attests to the impermeability of the underlying clay. Disturbingly at least one of the soil test pits has been dug into these earthworks, not only causing damage, but creating erroneous data about the nature of the ground. I have reported this (email attached in Appendix B).

4. Even in dry periods there are many areas of the site which are subject to pooling surface water. Notably one situated around the area of the second drainage test ditch to the South of the site (I assume that the function of the ditches must be to assess either BRE 157 or 365) and one in the centre of the lower part of the field. This picture was taken in August of this year:

[refer to photograph within attached representation documents]

5. The National Planning Policy framework clearly states that :

The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. However, land which would naturally flood with an annual probability of 1 in 20 (5%) or greater in any year, or is designed to flood (such as a flood attenuation scheme) in an extreme (0.1% annual probability) flood, should provide a starting point for consideration and discussions to identify the functional floodplain.

Evidence presented here clearly demonstrates the extent of the floodplain and the impact that it has on the existing environment and should be included in the applicants environmental statement or in an amendment made by the Council Planning body (full text included in Appendix H).

Unacceptable peril

The development of Sandringham Road, Windsor Drive, Holyrood Close and Balmoral Road was built in 1972/3. At the time of its construction national considerations relating to flood plains was limited. As a consequence many of the properties on both Balmoral Road and Sandringham Road are currently adjudged to be at risk of flooding. This flooding is brought about by the abstraction of surface water from the built environment into a stream feeding the Lambrok which, in addition to natural and man-made drainage from fields between Trowbridge and Southwick, brings about regular flooding.

A consequence of this flooding is to be seen on Sandringham Road, where brown water is forced back through the drainage pipes to be expelled in properties and their gardens. This is a situation which happens on a regular basis at the current time. Any disturbance of current drainage patterns cannot but further this flooding. In their letter to planning dated 16th May 2017 hotlink:
<http://unidoc.wiltshire.gov.uk/UniDoc/Document/File/MTYvMTIyNzkvT1VULDK3OTEzMg==>

Leachfields make a case that all surface water generated by the proposed development off Blind Lane in Southwick will be abstracted before reaching the Lambrok Stream. Unless this is absolutely 100% successful with no drain off into arable land and with sufficient contingency to counteract the loss of drainage into unsaturated land the situation further downstream will be worsened.

Should any other built form be introduced to the current drained environment without the capacity to hold and disperse significantly above 100% of current capacity this situation will also be exacerbated. Drainage plans will allow for surface dispersal but additional runoff is an inevitable consequence of replacing a semi-permeable landscape with one which is impermeable. As stated in the Environmental section of this objection, test pits and professionals alike have attested to the superficial nature of the soil in this area. The underlying clay is impermeable and the smallest percentage of unforeseen water entering the current drainage system will overwhelm a system which regularly fails.

Current guidelines relating to building in flood affected areas require a lifetime certainty that flooding will not occur, this expectation is nominally 100 years:

“Residential development should be considered for a minimum of 100 years, unless there is specific justification for considering a shorter period. For example; the time in which flood risk or coastal change is anticipated to impact on it, where a development is controlled by a time-limited planning condition.

The lifetime of a non-residential development depends on the characteristics of that development. Planners should use their experience within their locality to assess how long they anticipate the development being present for. Developers would be expected to justify why they have adopted a given lifetime for the development, for example, when they are preparing a site-specific flood risk assessment. The impact of climate change needs to be taken into account in a realistic way and developers, the local planning authority and Environment Agency should discuss and agree what allowances are acceptable.”

Paragraph: 026 Reference ID: 7-026-20140306

Revision date: 06 03 2014

Not only is this not possible to apply to potential building on this field due to disturbances upstream but it actively infringes this recognised guidelines for the current built form. Houses built less than fifty years ago are currently at annual risk of flood events. Any development on land upstream will worsen this situation and remove the right to lifetime certainty as set out above.

A report by Sky News ran as follows:

“Councils are no longer forced to take other local authorities' housing allocations if it conflicts with national policy. That would mean less pressure to build on flood plains for planners, who have long been expected to help town halls meet house-building targets. Many hope the new guidelines will also ensure experts' advice plays a greater role in the planning process....Environment Agency figures given to Sky News show that is not

always the case. In 2012-13, applications for 560 residential properties across England and Wales were approved in areas of flood risk, against the agency's advice. “

Summary

The land suffers from serious flooding already currently impacting severely on the built form around it. Any further water entering the drainage system will exacerbate this and will break the Environment Agency 'Lifetime surety' to be free of flooding for at least 100 years for homes already existing.

Photographic evidence (Appendix F) clearly illustrates the quantity of clay underlying the site and the innate inability of the geology to safely remove current surface water without the addition of additional surface run-off.

Location in relation to the current built form will create unacceptable peril for existing and incoming residents.

ADDENDUM

On the 12th of September 2017 I contacted the Environment Agency to thank the planning case officer for 3565 for her assistance in preparing my objection. During the course of our conversation she informed me that a fresh flood map for the site had been prepared in the light of more complete evidence.

A significant portion of my initial objection was that the notified floodplain for the area (estimate below) was far less than the actual. I presented the same evidence as documented in my objection.

[refer to aerial image in attached representation document]

The areas in blue indicate the level two floodplain whilst the areas marked in red are level three.

As a consequence of changes in the new flood map the total area of floodplain has increased dramatically and the problematic surface water in the central part of the site has now been recognised. The size and positioning of the new notified area further supports evidence provided in the main body of my submission and specifically relates to:

Access to the site – any direct access from the A360 must surely now be impossible due to the size and spread of the level 3 notification.

The exacerbation of existing flooding and unacceptable peril – a part of Sandringham Road is now notified as level 2 floodplain and ANY development impacting on that is precluded.

Unsuitability of the site – Excess surface water and absence of options for acceptable drainage in the central part of the site should render it unfit for development.

Environment Agency current flood map

[refer to flood map extract in attached representation document]

Additionally this confirms that much of the test work completed by geoconsulting.eng took place either within the margins of the level three floodplain or entirely beyond the affected area of surface water. This would serve to further invalidate the accumulated data that they have collected in submission of any application.

Attached files (Please see Objective)

4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	785	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Paragraph 5.3 makes reference to the relevance of Core Policies 52 in the WCS (Green Infrastructure). However this policy is essentially incomplete because it refers in both the supporting text and the policy itself to an important key document, namely the "Wiltshire Green Infrastructure Strategy" which has not yet been produced. A development cannot be deemed to be in compliance with this policy in the absence of such an important underlying strategy. A Green Infrastructure Strategy is needed as a high priority. This needs to build on the useful work which has been undertaken locally in and around Salisbury by the Salisbury Area Greenspace Partnership.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	786	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Historical</p> <p>As mentioned above, site 3565 is home to post-medieval earthworks. These have had only superficial exploration and cataloguing and are therefore covered in section 169 of the National Planning and Policy Framework (full text in appendix G).</p> <p>In an email dated 21/6/17 the County Planning archaeologist confirms that only superficial and preliminary work has taken place on either the known features or in search of any other potential archaeological features. A possible consequence of this further study would be to have a PPG16 order enacted as outlined in the NPPF 2016.</p> <p>These earthworks are materially connected with the Grade II* listed Southwick Court farm and can be argued to be integral to its place in the natural and developed landscape. This additionally impacts on the listing of the property itself and the context in which it sits. In addition to their relevance to the site as included in the proposal their importance is compounded by their relative rarity and by the permanent loss that would result from their destruction.</p> <p>As the County Planning Archaeologist said in an email dated 21st June 2017:</p> <p>“I have previously provided screening opinion advice for this site to the planning team. I highlighted that The Wiltshire and Swindon Historic Environment Record shows that a number of features have been plotted within the proposed development site which relate to a post-medieval water meadow system. Southwick Court Farm lies immediately south of the proposed development site and contains a number of important heritage assets including a medieval moated site with a medieval farmstead of which the farmhouse is a Grade II* Listed Building (national ref. 1194818) dating from 1567 to 1599. I therefore raised the need to have a full assessment of the impacts on the heritage assets in particular on the water meadows and Grade II* Listed Building.</p> <p>Without further assessment I cannot advise on the appropriateness of the development but I would say that putting 180 houses will have an impact on a number of heritage assets.”</p> <p>To the best of my knowledge such an assessment has not yet been carried out and at the time of writing the deadline for submissions to the consultation period expires in three weeks.</p>				

	<p>Summary</p> <p>Extremely rare post-medieval earthworks will be destroyed (earthworks which have already suffered damage from ill-informed exploratory work). The field system and managed landscape associated with a grade two listed building will be destroyed.</p>
Attached files (Please see Objective)	4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	787	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Access</p> <p>Access to the site appears to be unclear. The initial Proposal document included, in appendix G, the suggestion that access should be through the current built form. Conversations with the teams both surveying and conducting groundworks on behalf of the potential developer and the omission of that phrase from the documents shown publicly during the exhibition on 26th July 2017 in County Hall would suggest that this element has been dropped. However, should this have been an oversight I would like to present the following evidence:</p> <ol style="list-style-type: none"> To 'break through the current built form' would require building across a 'ransom strip' put in place to prevent such a move when the current housing was built. This would require compulsory purchase from the owner and in the words of Councillor Berry: "There is no compulsion to develop" To access the site from Silver Street Lane would require cutting through the existing hedgerow. The 1997 Hedgerow act make this illegal. The act confers the status of 'important' for a number of criteria See appendix D. This hedgerow meets those criteria in the following ways: It appears on the Ordinance Survey revision map of 1890 (below) as an historic Parish Boundary, and in the Andrews and Dury's map of 1793 (also below; detail only) dividing as it did and still does Trowbridge and Southwick. The original can be found in Wiltshire and Swindon History Centre and is reproduced in Appendix C. [refer to map extracts within attached representation document] It therefore marks a pre-1850 parish or township boundary (criterion a) It incorporates an archaeological feature (post medieval earthworks) as noted in the Proposal and confirmed by the Planning Archaeologist (email in appendix C) (criterion 2/3). The hedgerow is associated with a pre-1600 estate or manor (criterion 4) Any vehicular access via Silver Street Lane would significantly increase traffic around the sensitive area of The Grove School (c.f. Unacceptable Peril). <p>If, as has been suggested by surveyors and ground workers employed by Barratt Homes, this option no longer features I understand that the alternative solution is to access the site from the A361. According to both the survey team and ground workers (photo in appendix F) this would involve building a road and culvert directly across the notified flood plain which would serve not only the proposed housing, but the satellite educational facility. In objection to this I would like to present the following evidence:</p> <ol style="list-style-type: none"> The size and severity of the existing floodplain has been significantly underestimated as can be seen in this photograph: [refer to photograph within attached representation document] <p>Further evidence of this is to be found in appendix A.</p>				

	<p>This would render the required size and scale of the road and culvert to be disproportionate. In order to meet planning and environmental requirements relating to lifetime security from flooding this access point would perforce be over engineered to a staggering extent. This further underlines the unsuitability of the site.</p> <p>As seen in the satellite photo below the proposed cut-through and associated grubbing out of the hedgerow would take place as illustrated : [refer to aerial image within attached representation document]</p> <p>Not only does this potential access drive across the floodplain and major waterway (The Lambrok) but through the same Important Hedgerow. As can clearly be seen, not only is the hedgerow one and the same as the previously identified protected and Important hedgerow, it has further protection by its direct association with the Listed building. By extension this association further protects the entire run of hedgerow as laid down in the 1997 Hedgerow Act (see appendix D).</p> <p>In addition to the inelegance of the access, the following direction is included in Guidance for developing on notified flood plains: Wherever possible, safe access routes should be provided that are located above design flood levels and avoiding flow paths. Where this is not possible, limited depths of flooding may be acceptable, provided that the proposed access is designed with appropriate signage etc to make it safe. The acceptable flood depth for safe access will vary depending on flood velocities and the risk of debris within the flood water. Even low levels of flooding can pose a risk to people in situ (because of, for example, the presence of unseen hazards and contaminants in floodwater, or the risk that people remaining may require medical attention).</p> <p>Paragraph: 039 Reference ID: 7-039-20140306 Revision date: 06 03 2014</p> <p>Access to the site is therefore limited to either locating a suitable existing break in the hedgerow further to the South, possibly mirroring the trackway leading to Southwick Court or cutting through private property belonging to Bramble Farm. These restrictions further illustrate the unsuitability of the site for development.</p> <p>Summary Access to the potential site cannot be through the Important and protected hedgerow. Access can only be from the A361 directly past the grade two star listed building.</p>
<p>Attached files (Please see Objective)</p>	<p>4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	788	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Ecological Site 3565 currently acts as a habitat for a number of species which are notified. They include confirmed populations of Bechsteins bat, water voles and Red Kites. Furthermore the associated ecosystem serves to support and maintain those species. The removal of any significant component of this integrated ecosystem would inevitably lead to the unsustainability of many others. In addition, the existence of this 'green corridor' acts as a vital element of the connectivity of the surrounding countryside. Regular sightings are made of animal species using this throughway from foxes to Red Deer. Taken into account with the habitats of the more endangered species such as the bats this natural corridor both supports and sustains many species in both a local and transitional context. In the Natural England reply to the initial planning enquiry by Wiltshire Council it is stated that: "Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this proposal is likely to affect such populations to an extent sufficient to require an EIA. It remains the case, however, that the developer must provide information supporting this application sufficient for your authority to assess whether protected species are likely to be affected and, if they are, whether sufficient mitigation, avoidance or compensation measures be put into place." Any information provided by the developer is not yet in the public domain, however, I believe that information provided in this letter and those of many other individuals should be included in the process of commissioning an EIA.</p> <p>Contains certain categories of species of bird, animals or plants listed in the Wildlife and Countryside Act or Joint Nature Conservation Committee (JNCC) publications. Runs alongside a bridleway, footpath, road used as a public path, or a byway open to all traffic and includes at least 4 woody species, on average, in a 30m length and has at least 2 of the associated features listed at (i) or (v) below. The associated features are: A bank or wall supporting the hedgerow. Less than 10% gaps. On average, at least one tree per 50m. At least 3 species from a list of 57 woodland plants. A ditch. A number of connections with other hedgerows, ponds or woodland. A parallel hedge within 15m. The act states that the hedgerow cannot be removed and can only be temporarily broken through if the work is for defence of the realm or for public safety reasons and only if there is no other access. If a breakthrough has to occur it must be no wider than 20 metres and replaced as soon as the work is complete. Furthermore it is clearly stated that:</p>				

	<p>“The presumption is in favour of protecting and retaining important hedgerows” (The hedgerow regulations 1997 1.7) The explanation of the document can be found in its entirety in appendix D.</p> <p>Summary Bird and animal species will be denied an ecological niche which has been in existence for a documented 100+ years.</p>
Attached files (Please see Objective)	4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	789	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Any development on site 3565 will bring families with children. As developed in detail in the sections relating to environment, access and infrastructure, schooling is an issue which will require significant forward planning. Currently Southwick School and North Bradley School are full. Leachfields in their letter regarding the development of land off Blind Lane in Southwick (as above) recognise this tacitly by their offer to give money to Walwayne Court School. I am certain that to make this offer they have completed all of their due diligence on the availability of school places in the area and that the only available option is to work with a school four miles away (creating a round trip total of sixteen miles by car for every family).</p> <p>The only other option for schooling will be The Grove School. This school currently has some spaces, but would necessitate either a significant car journey, or a walk on existing footpaths. The area around the school has significant parking restrictions which are being toughened. Already parents line Silver Street Lane and Balmoral Road with their vehicles as evidenced below: [refer to photograph within attached representation document]</p> <p>And this situation will be exacerbated when the restrictions change. A major road safety issue is building without the influx of a greater number of children and vehicles either passing through Silver Street Lane or ‘ferrying’ students to and fro.</p> <p>Building on site 3565 will create traffic, parking and most importantly child safety issues. In terms of the criteria of sustainability this is surely a significant negative which must be considered.</p> <p>Infrastructure</p> <p>The topic of infrastructure is a challenge for all involved. During the Cabinet meeting of 20/6/17 the question was specifically raised and the answer was simple, if developers are asked to commit to infrastructure development before the building of houses they will not build the houses. Whilst this appears to contradict the publicly stated policy that building should not be developer-led, crucially the outcome is inevitably poorer service for all. Without going into great detail on a case-by-case basis, the example of the Health Centre on Paxcroft Mead is exemplary. Developers had permission to build granted on the premise that a Health Centre be provided, this then became a supermarket and local health resources were stretched that little bit further. With the stipulation that Local Government cannot control Health Services many infrastructure elements render this site less than optimal.</p> <p>As mentioned in unacceptable peril, a significant infrastructure requirement is education. Trowbridge is currently running with a slight surplus of primary school places and less so with secondary. After a career in education I understand the management of school funding. Schools will not receive funding for pupils until they walk through the door. Local Authorities are reticent about building more schools or extensions thereto due to the inexorable rise of Academies and the prospect that the significant financial commitment involved in building a new school is at risk of being taken out of public ownership.</p> <p>I understand from the surveyors from Waddington Homes who have already been at work on the proposed site that their outline plan involves the building of a satellite school, to be managed by The Grove School on the adjacent field. This presupposes both vehicular access and significant service access to the proposed site and the funding of the build and on costs of staff and resources. This is notoriously uneconomic as a process</p>				

	<p>and the likelihood here is that such an enterprise is more readily managed by The Mead cluster who can bring economies of scale to the process. The drawback here being that The Mead cluster is not under LA control and any public investment would be irrevocably lost in double-quick time.</p> <p>Accessible education for anyone living on the proposed development would therefore be a major issue.</p> <p>Access to transport links is another feature which renders this site unsuitable for development. According to sustainability criteria an optimal walking distance of 1.0 kilometres to the nearest railway station is to be desired. This site is significantly beyond that distance and will as a consequence add to traffic congestion both inside the town and on its main transport arteries, not to mention the additional demands on parking near the station.</p> <p>Summary Public services and access to significant public transport hubs are out of specified range of this development. Traffic and education will be specifically impacted.</p>
<p>Attached files (Please see Objective)</p>	<p>4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	790	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Unwarranted destruction of green space Despite the proposal splitting site 3260 from site 3565 to create two entities of 17.6 hectares and just over 4 hectares the total developed land within the proposal is significantly above the 20 hectares stipulation for certain requirements in planning law. I have had assurances that the Governmental and NGO's will be viewing the sites in the proposal as a single entity. With restrictions imposed upon the proposed site(s) in terms referenced in Environment, Historical and Ecology sections. The site will be a mish-mash of access, building and ancillary systems. In terms of the loss of a single, continuous buffer at the junction of village and town the loss is catastrophic. A significant piece of land with social, historical and economic value is potentially being carved up. Summary Public access to land which has been used as a public resource with the support of the landowner and on which residents have had their ashes scattered for a minimum of 40 years will be removed.</p>				
Attached files (Please see Objective)	4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	791	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Procedural anomalies</p> <p>As documented in appendix B I have sent a number of emails requesting information and confirmation of contacts. Many of these mails have been a significant length of time in the system before any response. Some have been left unanswered and some have not addressed the questions raised. In recognition of this, which I presume to be a mixture of time and work pressure during a time of significant annual leave, I wrote to Councillor Sturgis and requested an extension of time to gather information and fact from Council sources. I have re-sent this request and am still to receive a reply (mails attached in appendix B). Sadly I feel that I have no alternative but to air this one-way conversation publicly and raise the following procedural queries:</p> <p>If, as committed during the Cabinet meeting of 20/6/17 by Baroness Scott, Council resources are to be committed to independently verify data presented by developers what is this and when is it to be gathered? Surely in order to fully consider all information in a proposal such as this the information must be gathered in advance of any decision? At the time of writing, the consultation process is more than half way complete and, to the best of my knowledge not a single Council officer has visited the site, let alone performed any physical works.</p> <p>In a series of emails (Appendix B) I have proved that geoconsulting.eng, acting as agents for potential developers, and themselves based in Devon have placed soil sample trenches on top of historical earthworks. I have submitted to planning a series of OS coordinates and altitude readings for all of the test pits. With the underlying geology comprising thick clay, the placing of these sampling trenches on top of man-made features will inevitably create erroneous data, Drainage rules clearly state that any soak-away must be into a minimum of one metre of unsaturated soil. To take these samples from what is effectively piled-up topsoil, which would itself be levelled for any development, is meaningless. I have attempted to have this recognised with little success. I have attached approximations of the wells, drainage pits and soil sample pits along with indicative public footpaths and byways in Appendix E along with the closest OS coordinates and altitudes along with dated photographs of the drainage progress in these pits.</p> <p>Given the commitment made publicly in the Cabinet meeting of 20/6/17 that the process would be transparent and not developer-led not a single Council groundwork has been attempted. In contrast sub-contractors for Barratt Homes (geoconsulting.eng and Waddington Homes) have made at least five in-depth works on site 3565 and adjacent fields (see photos in appendix F). Whilst the landowner has the perfect right to commission any fieldworks that she wishes any uncontested data could only be developer-led and totally reliant on a developer vested interest. If this process is not to be developer-led it would be reassuring for this data to be ruled inadmissible in anything relating to decision-making in this process.</p> <p>In their letter to Wiltshire Council in January 2017 in response to an enquiry Natural England concluded that this site is marginal. This response was, in part, informed by a lack of information provided to them. They have been interested to learn of the nature of the Important hedgerow, the extent and rarity of the post-medieval earthworks and the far greater extent of the notified floodplain. Is there no requirement for Council officers to pass on this information rather than leaving this to members of the public?</p>				

	<p>Procedural anomalies relating to the process itself are rife. The indications being that this parcel of land has been added in a rushed manner to the Proposal without due diligence on its suitability having been performed. Furthermore all attempts to activate the commitments made by Councillors by County Officers have been met with negativity and inaction.</p> <p>There is no active support for this site from either, Local Council, Environment Agency, Natural England, Historic England or the County Planning Archaeologist despite such active support being voiced for other sites within the Proposal. In fact in a response from Natural England the case officer said :</p> <p>“I have briefly looked at the conclusions/recommendations in the Trowbridge Community Area Topic Paper and have noted that Site 3565 (Land east of the A361 at Southwick Court), is considered to be a less sustainable options for development, and that five moderate adverse effects have been identified in relation to this site.”</p> <p>As NPPF demands: “If a planning application fails to score positively against the aims and objectives of the Local Plan Sustainability Appraisal or Local Plan policies..... planning permission should be refused.”</p>
Attached files (Please see Objective)	4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	792	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The National planning frameworks clearly states that: 157. Crucially, Local Plans should: plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation identify land where development would be inappropriate, for instance because of its environmental or historic significance contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified Point seven above is applicable in this instance due to both the environmental and historical issues related to this site, specifically relating to the larger than notified flood plain and issues relating to rare historical earthworks and the Important and protected hedgerow.				
Attached files (Please see Objective)	4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	793	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In relation to the standpoint of the Council being adamant that any building work relating to housing not be developer-led is there any justification for advertisements such as this:</p> <p>“Land Requirements Top of Form Ashford Homes are currently developing. If you have land in either a greenfield or brownfield location, with or without planning permission, which you are thinking of selling, please do not hesitate to contact us. Our Management team will be pleased to offer advice on any planning related and technical matters.” This would appear to indicate that much activity cannot be anything but developer-led. In the Officer’s report relating to the development of the nearby solar farm (15/04570/FUL) the final paragraph reads: “A question was asked by a member of the public as to why the applicant put a notice in the paper advising landowners to come forward and not the public which is a procedural matter for submitting applications.” This remains a question hanging in the air some two years later. National Planning Policy Framework provides the following instructions:</p> <p>155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <ul style="list-style-type: none"> · Infrastructure <p>162. Local planning authorities should work with other authorities and providers to: assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands take account of the need for strategic infrastructure including nationally significant infrastructure within their area</p> <p>166. Local Plans may require a variety of other environmental assessments, including under the Habitats Regulations where there is a likely significant effect on a European wildlife site (which may not necessarily be within the same local authority area), Strategic Flood Risk Assessment and assessments of the physical constraints on land use⁴. Wherever possible, assessments should share the same evidence base and be conducted over similar timescales, but local authorities should take care to ensure that the purposes and statutory requirements of different assessment processes are respected.</p> <ul style="list-style-type: none"> · Historic Environment 				

	<p>169. Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future. Local planning authorities should either maintain or have access to a historic environment record.</p> <p>170. Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.</p> <p>A functional floodplain is a very important planning tool in making space for flood waters when flooding occurs. Generally, development should be directed away from these areas using the Environment Agency's catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities.</p> <p>The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. Areas which would naturally flood, but which are prevented from doing so by existing defences and infrastructure or solid buildings, will not normally be identified as functional floodplain. If an area is intended to flood, eg an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often.</p> <p>Paragraph: 015 Reference ID: 7-015-20140306</p> <p>Highlighted references serve to further prove that the site nominated as 3565 is unsuitable for development of any nature. A complete set of requirements relevant to this objection can be found in Appendix G.</p> <p>Poorly informed exploratory work will inevitably lead to erroneous data in support of the application.</p> <p>Bottom of Form</p>
<p>Attached files (Please see Objective)</p>	<p>4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	794	Consultee Graham Hill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126137	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Despite public commitments to hold a Public Presentation outside of the School Holiday time; a commitment made some three mionths ago; it now appears that this will be “impossible”. This was either known at the time of the publishing of the minutes, and has been kept from the public, or else the commitment was neve made with any degree of conviction.				
Attached files (Please see Objective)	4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	795	Consultee Graham Hill Person ID: 1126137	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Economic Hardship</p> <p>I am very clear that the devaluation of property is not an issue which the Council can concern itself about. However, Mr Marshall, the tenant farmer based at Bramble farm, has made no secret of the fact that the loss of this field designated 3565 would put him out of business. The field is used for the grazing of his cattle for a part of the year and is harvested for hay during the summer months. Without this hay his business would not be viable.</p> <p>Whilst this may appear to be acceptable collateral damage as a price for the housing it must be taken into the wider context of the proposal. The proposal suggests that all other fields between Southwick and Trowbridge be retained as a 'green buffer'. There is no mention of the ongoing costs of the County Council funding the upkeep of this buffer by which I can only draw the conclusion that they expect the current regime to continue. However, no farming means no maintenance of the land without a significant open-ended financial commitment from the Council.</p> <p>The loss of this managed landscape in its entirety does mitigate against the sustainability of any development on this site.</p> <p>Summary Short and medium term economic impacts will render the entire managed field system derelict.</p>			
Attached files (Please see Objective)		4710670 / 4710667 / 4710669 / 4710671 / 4710673 / 4710666 / 4710672 / 4710668 / 4710674			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	796	Consultee Ms Margaret Willmot Person ID: 378123	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.128		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would take issue with the statement that “The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS” for the following reasons:</p> <p>a) The ‘Salisbury Transport Strategy’ has never been completed, some points regarding the deficiencies in the consultation process, completion and adoption process are covered in an email which I sent to Cllr John Thomson, then WC Cabinet member for Highways in January 2014 (see attached). There has been no response to this email.</p> <p>b) There can be limited credibility in respect of ‘Salisbury Transport Strategy Summary’ [STSS] dated Nov 2012. Measures proposed have never been the subject of a consultation (see (a) above), there is no indication of what exactly this summarises, and there is no author or authorisation given.</p> <p>c) There are a number of instances where the STSS is at variance with what has actually happened, for example:</p> <ul style="list-style-type: none"> - The STSS (para 1.3) indicates there will be 1300 new homes at Churchfields and Central Car Park. The June 2017 Pre-submission Draft Wiltshire Housing Sites Allocation Plan indicates (para 4.66) that much less housing than this will be delivered on these sites before 2026. - The STSS (Figure 1.1) stated there would be 450 dwellings at Longhedge, but this has now been increased to 673 (Option A, planning application 13/00673/OUT) <p>d) STSS makes the statement (para 5.3) that “Implementing the transport strategy could ensure that 45% of these new trips to the city centre are made by sustainable modes in 2026. If the Salisbury Transport Strategy was not adopted (the business as usual approach), the forecasts show that only 20% would be by sustainable modes.” However there would appear to have been no monitoring of the STSS or the percentage of new trips to the city centre being made by sustainable modes. It is relevant in this context to note the following:</p> <ul style="list-style-type: none"> - When the Planning Inspector reported on the Wiltshire Core Strategy (WCS) he placed particular emphasis on monitoring criteria, which it was noted have been removed from the WCS and placed in the Monitoring Framework. (see Inspector’s report on the WCS, 1.12.2014, para 421). The Monitoring Framework does not incorporate targets relevant to the goals of the STSS (see separate representation re paragraph 7.6) - Annual Monitoring Reports have not been published other than in respect of Housing Land Supply (see separate representation re paragraph 7.7). <p>Considerable work will be necessary using current traffic data and reworking the traffic models in the light of current and proposed developments in order to produce a current and complete Salisbury Transport Strategy. There also needs to be a review, and widespread understanding, of the radical nature of the transport interventions which may be needed to enable Salisbury to cope with increased development. A Salisbury Transport Strategy is a key underlying document which is fundamental to delivering sustainable development (as is a Green Infrastructure Strategy) and these are urgently needed to underpin and inform any development proposals</p>				
Attached files (Please see Objective)	4706486				

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

It is to be hoped that there will be progress towards a Salisbury Transport Strategy prior to the public examination of this Housing Allocations document. However past experience has shown that transport issues may be inadequately addressed and I feel discussion of these matters at the oral examination is therefore necessary.

Comment ID:	797	Consultee Ms Helen Down	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure 5.19 H3.1 South of Netherhampton Road, Salisbury, Figure 5.21 H3.3 North of Netherhampton Road, Salisbury, and Figure 5.22 H3.4 Land at Rowbarrow, Salisbury		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The principle reason I consider the draft plan unsound is because of the additional traffic that a development of this size would have on the existing road infrastructure, particularly that on Netherhampton Road. Most of the traffic would be forced towards the Harnham gyratory and Newbridge Road to get around the city and beyond.</p> <p>It only takes a jack knifed lorry to bring the existing road network to a complete standstill for several hours, as happened almost two year ago. More recently a pedestrian was killed after being knocked down by a cattle truck on the Netherhampton Road.</p> <p>There is also a risk that ambulance response times will be affected, as this is a major route for vehicles between the ambulance station near Salisbury District Hospital and Wilton and other parts of south Wiltshire.</p> <p>Overall the impact is likely to have a significant detrimental affect both in economic terms and the safety of all road users particularly during peak times.</p> <p>The plan does not provide sufficient detail on what transport measures would need to be adopted to make a development of this size viable. While there is mention of the Salisbury Transport Strategy being the solution to all of the developments proposed, the specific problems and solutions on how they will be overcome are not outline at all.</p> <p>An extensive road traffic review and subsequent plan needs to be put in place, along with full costings and implications. Without a proven road traffic plan the proposed draft housing allocation is cannot be considered viable.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	798	Consultee Ms Susan Mawer Person ID: 1126176	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site Nos. H3.1 and H3.3			Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	NOT FAIR OR PROPORTIONATE There is no “nimbyism” behind our objection. The constructive manner in which all residents of Netherhampton have engaged in the discussion with the Wilton Estate regarding the planning application for development at Netherhampton Farm demonstrates that there is acceptance of the need for new housing provided that its scale is in keeping with the existing settlement and can be sustained by the local infrastructure. Netherhampton has approximately 60 dwellings and this new development at Netherhampton Farm will increase that number by over 30%. This feels like a fair share of the overall commitment facing South Wilshire and Wiltshire generally. The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on this small village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury. The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary? The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	799	Consultee Mr David Palmer	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126111	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	The Plan overestimates the requirements for housing sites. They have been over allocated for Trowbridge. The allocation of sites is far too heavily weighted against Trowbridge as opposed to other towns in the County.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	800	Consultee Dr Gill Anlezark Hon Membership Secretary	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Cycling Opportunities Group for Salisbury (COGS)	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		South Wiltshire housing Market Area-Salisbury		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The NPPF emphasises the principles of sustainable development and within this, section 4 (p9) describes the need to promote sustainable transport. Para 35 states “Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to</p> <ul style="list-style-type: none"> ● give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; ● create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones; ● consider the needs of people with disabilities by all modes of transport.” <p>Regard for these principles seems to be lacking in the Pre-submission draft Wiltshire Housing Site Allocations Plan for Salisbury, where little consideration is given to mitigating a potential increase in traffic movements through Harnham and ring road junctions. Strategic transport and planning decision-making in Salisbury is hampered by the need for local decisions to be made using the Area Board system that splits the populated area into three separate Boards, plus Amesbury to the north, and a Salisbury City Council area that excludes many of the major housing developments and other traffic generators (hospital, schools), but has to deal with the consequences, such as deterioration of air quality and conditions for walking and cycling, and demand for parking. The NPPF stresses that planning strategically across local boundaries is essential and a local system that fragments decision making where borders are crossed mitigates against implementing a city wide network of Green Infrastructure and walking and cycling routes. The final Housing Site Allocation Plan needs to deal effectively with these issues. Our main concerns centre generally around the lack of implementation of the Salisbury Transport Strategy (adopted 2012 without public consultation) and are specifically related to the current housing allocation sites in Harnham. Whilst the housing allocation numbers are largely unchanged from when the Strategy was formulated, the shift from Churchfields to Harnham significantly alters the impact of traffic generated towards the Harnham Gyratory, Exeter Street and College roundabouts, and potentially Park Wall, all junctions modelled as operating at 70-90% of capacity by 2026 on a “business as usual” basis (Salisbury Transport Strategy Summary, 2012, Fig 3.2). We are already 9 years away from the base measurements (2008) and only 9 years from the 21% increase in traffic by 2026 predicted on the “business as usual “ basis. None of the “do something” plan has yet been implemented or even planned so the “business as usual” option remains in force. We are not aware of the results of any survey work that has been undertaken since 2008 or what it might reveal about the actual growth in traffic in the intervening years. A refresh of the Transport Strategy is long overdue, but has been constantly delayed over the last 12-18 months, and the recently released housing allocations make the refresh and implementation of the Strategy even more urgent. The Plan states (para 5.128) that "The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS. Plan allocations crystallise the pattern growth takes up to 2026 and refreshing the Salisbury Transport Strategy will allow the effectiveness of existing measures to be reviewed and propose new ones to accommodate growth." No implementation prior to development seems to be envisaged</p>				

The Salisbury Cycling Strategy is quoted by developers in support of planning applications, but the network as described in maps (<http://www.wiltshire.gov.uk/transport-town-cycle-networks>) is largely at best incomplete and at worst merely aspirational. The feasibility of retrofitting modern cycling infrastructure where major roads are narrow is a significant problem. Much of the major road network delivers direct and reasonably graded access to the city centre, but heavy traffic acts as a deterrent to a shift to cycling and walking. Alternative routes on quiet roads and making use of Green Infrastructure have been identified, but require considerable investment to form a comprehensive, coherent, convenient and signed network. Green Infrastructure has been mapped and routes identified that would make attractive walking and cycling routes for commuting and leisure, but as yet any Green Infrastructure Strategy has not been consulted on or adopted. Traffic and lack of comprehensive cycling and walking facilities act as deterrents to a shift to sustainable modes. In the case of Harnham, further increases in traffic between Netherhampton and the ring road where cycling facilities have yet to be completed will deter more people from accessing Salisbury City centre, education and employment by bike.

Public transport can assist in modal shift towards sustainable transport, but bus services in Salisbury do not currently reflect where people need to go from housing developments to schools, colleges, employment, shops and other transport hubs like the railway station. In relation to the housing allocations under consultation, there is no bus service to Netherhampton, neither is there a Park and Ride site serving Harnham. Potential housing developments on Netherhampton Road and Rowbarrow (H3.1, 3.3 and 3.4) are on roads that lead into Harnham Gyratory and Exeter St roundabout and subsequently College roundabout and St Marks roundabout on the ring road. All these junctions, as noted above are predicted by modelling to be at or near capacity by 2026 without modification or improved facilities for pedestrians and cyclists (Fig 3.2, Salisbury Transport Strategy Summary 2012). Additionally Netherhampton Road (and Harnham Road) are narrow, passing through residential areas to reach the ring road. The alternative for traffic joining Netherhampton Road is to use Park Wall, also identified as approaching capacity by 2026. Netherhampton Road has no bus or Park and Ride service and cycling and walking routes are incomplete towards the ring road. Rowbarrow is somewhat better served at present with a cycle and pedestrian crossing over Downton Road allowing access to the local cycle network and City centre, as well as shared use facilities to Salisbury Hospital. We propose the following facilities are essential to provide comprehensive, coherent, high quality cycle and walking networks from Harnham to education, employment, shopping and leisure. The Plan needs amendment to include these alongside implementation of a refreshed Salisbury Transport Strategy before the commencement of any developments

- Complete cycle and walking routes along Netherhampton and Harnham Roads to the gyratory (Schools, employment)
- Complete redesign of Harnham Gyratory to include facilities for pedestrians and cyclists to cross safely, directly and conveniently (Schools, employment at the hospital and Wiltshire College, shopping on Southampton Road, City centre)
- Shared use path on the west side of New Bridge Road as on the east side to avoid cyclists having to cross to the other side to access the Grammar School and Cathedral Close
- Links from new housing to Middle Street (crossing needed) to access Town Path (to City centre, railway station) and Broken Bridges (employment at Churchfields, railway station)
- Improvements to both Town Path (increased use will require widening to accommodate more cyclists and pedestrians) and Broken Bridges (surface and bridge improvements to accommodate cycling safely)
- Complete cycle and walking route westwards along Netherhampton Road past the Garden Centre to access Netherhampton village (crossing needed), and improve the agricultural underpass and its accesses to provide cycling and walking links to the Wiltshire Cycleway
- New bus services for the development

The proposed development at Hilltop Way (H3.2) is stated to be outside cycling distance of the City centre (p77, Salisbury Community Area Topic Paper, Accessibility) “The site is situated to the north of Salisbury. The city centre is approximately 2km away. The site is not considered to be within a reasonable walking/cycling distance to the city centre, although there is access to local bus routes.”

This statement needs modification. Two km is a short distance to cycle and is quite walkable for a reasonably healthy person. In planning terms cycle commuting or utility trip distances of 5-8km are typical (DfT Local Transport Note, 2/08 Cycle Infrastructure Design) and considered to be quite reasonable (Wiltshire LTP3 Cycling Strategy, section 2.7). In the case of this site, the Golden Way cycle and walking route passes to the north and gives traffic-free access to Castle Road for the City centre and Bishopdown for schools there and in Laverstock, and also shopping on London Road.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	801	Consultee Mr Mark Sparrow Person ID: 1126183	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The development site is outside the settlement boundary. The development would have an adverse effect on the conservation area of the parish, impacting the views from higher ground and the White Horse. The development would have an adverse impact on local amenity and represented over-development. The development will have a detrimental impact on already over burdened infrastructure. There were other potential sites within the existing settlement boundary which needed to be considered which could provide the potential for development to meet local need within the settlement boundary. The increase in residents would represent an unmanageable increase in traffic and create significant highway issues I do not believe this is a sound proposal and can see no way to improve it. In the same manner that Westbury has been over burdened with housing without adequate provision to the town's supporting infrastructure, this development will have a detrimental impact to Bratton rather than a positive one.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	802	Consultee Mr Robert Quarm	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126187		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 at Netherhampton on the A3094			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan to site 640 houses on the Netherhampton Road seems to me to be unfeasible. The implication that businesses from Churchfields would compound the issue.</p> <p>Strategically the site is poorly placed. There is minimal local employment so residents would have to travel through Salisbury to access local jobs or commute elsewhere, access secondary schools or other of the City's amenities. The proposed site is not within walking distance of the City Centre which would also increase traffic.</p> <p>Most of the recent developments have been placed to access the Park and Rides – this development does not and would significantly increase traffic along the Harnham Road and Gyrotory which is already at capacity and is not conducive to sufficient alteration to ameliorate the problem. This would result in an increase in noise pollution, air pollution and a decrease in safety.</p> <p>I doubt development could be successful without a proper relief road for the whole of Harnham.</p> <p>5.130 Note: The site was previously rejected.</p> <p>5.132 indicates that 'The site has a strategic role as a possible destination for the relocation of businesses to allow the redevelopment of the Churchfields strategic allocation of the WCS'</p> <p>It is unclear how much of Churchfields Industrial Estate might be incorporated in or near the new development. What assurances could be given that this would not eventually constitute the whole of Churchfields? Heavy traffic would further disrupt the Netherhampton and Harnham Road and gyrotory and lead to an increase in HGV's, traffic fumes and noise for the residents on top of that from the extra residential quota. There must be figures for the traffic requirement of the current Churchfields site – it would be interesting to know what this is in terms of volume, type of vehicle and peak timings as well as the original source locations of the service traffic.</p> <p>I agree with a previous correspondent that there is potential for some housing near to the Britford Park and Ride and the Hospital which should be considered in preference; this area would also benefit from a new School.</p> <p>Alternatively it might be sensible to move the Churchfields development and some housing nearer the A303 as it now looks as though plans to widen the A303 (including Stonehenge tunnel) will come to fruition. Locating Churchfields on the North side of Salisbury would likely decrease traffic coming into Salisbury residential areas, improve access for the site and allow for future expansion, which would be to Salisbury's benefit.</p> <p>5.136. It would be useful to know what improvements could be made that could ameliorate the cumulative impacts of the proposal.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	803	Consultee Mrs Jean Broome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126182		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Hilperton Gap			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The Plan is not justified because the council have not explained what infrastructure will be put in place to support this expansion. How will schools, local jobs, doctors surgeries, dentists or hospitals for example cope with the extra pressure?</p> <p>There is no way to make this draft plan sound. Therefore I would recommend abandoning this unsound plan and start a new plan to utilize brown field sites that are practical, suitable for purpose and provide the required housing (not more housing than is necessary as is being proposed) without destroying valuable open countryside. ddTTT</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	804	Consultee Mr Paul Langham Owner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		a'Beckett's Vineyard Person ID: 481043		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.4 East of Lavington School			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Land east of Lavington School has no sensible access, the school drive, park road or grove farm estate cannot handle additional vehicles within the current infrastructure			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	805	Consultee Mr Paul Langham Owner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		a'Beckett's Vineyard Person ID: 481043		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.3 Southcliffe			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The road infrastructure is unsuitable to support an additional 125 to 150 cars making at least 350 vehicle movements a day. Market Lavington High Street is already difficult to negotiate. If a relief road was considered from the Spring playing field round to the other side of the eastern end of the former army estate it would be possible to incorporate this. Joined up thinking is needed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	806	Consultee mr chris kelly Person ID: 1126214	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
					Do you consider the draft WHSAP is sound?
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sutton Benger			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I have lived in Sutton Benger since 1992 and have seen many changes to the village and the surrounding area over that time. Many improvements have been made and I understand that inevitably expansion and increased housing are required. I feel the village has expanded if anything too quickly in recent years and is now such a size that we need a period of consolidation to enable the support services to catch up. I feel Sutton Benger has done its fair share of expansion up until now.</p> <p>Roads, traffic management, broadband internet, parking and the primary school are all working at full capacity.</p> <p>The main point I wish to emphasise is regarding the Primary School. It is in a central position within the village such that any further expansion would have a detrimental effect. The only further space available would be for the school to re-build two storey buildings and expand somewhat onto our recreation ground. That would have a massive detrimental effect on the life and vibe of the village, as well as going against the wishes of the benefactor who gifted the Rec to the village.</p> <p>Already local residents are losing the battle against school parking traffic, and it is a matter of time before a child is injured due to the amount of traffic and the speed of driving in the 20mph zone around the school and in Chestnut Road. The school itself is in an awkward position; as a business it wants to expand but at the same time has to be seen to be doing something in case there is an accident during pick up and drop off of the kids. The publication of cardboard signs warning about parking has limited effect. The reason for the current problem is that the school was allowed to expand and build on (or use for other purposes) the staff parking area within the fenced boundary. Now we are in a situation where we have on average 14 or more visitors / staff cars parked on the residential street all day (8am-5pm). This prevents the parents finding a safe drop off area when taking the children to school. This in turn leads to parents parking inappropriately or taking risks or parking further away in local streets. If you add in the school bus having to navigate down Chestnut Road it is all very hazardous at times. The congestion is considerable at peak times; actually the problem is that the school being the size it is, is actually in the wrong place.</p> <p>If and when new housing is forced upon us here in Sutton Benger, the school should be relocated as part of the plan. It should be something the developers are required to include in the plan. It would make sense to integrate this essential asset into any further expansion plans. These plans should include a dedicated staff car park and an area designed for the safe pickup and drop off of the children. This joined-up thinking would actually provide an asset to the village and many residents would then maybe support the expansion and building of some extra housing.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	807	Consultee Mr Paul Langham Owner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		a'Beckett's Vineyard Person ID: 481043		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.3 Southcliffe			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site would only make sense if a relief road was incorporated into the village as the infrastructure cannot support additional vehicles.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	808	Consultee Mr Paul Langham Owner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		a'Beckett's Vineyard Person ID: 481043		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.4 East of Lavington School			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Makes no sense to develop here as access to and from the site is limited and would burden the infrastructure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	809	Consultee Mr Paul Langham Owner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		a'Beckett's Vineyard Person ID: 481043		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5 West Lavington & Littleton Panell settlement boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The 2003 Conservation Statement shows the extent of the conservation area covering a'Beckett's House, 25 and 27 high Street but the settlement boundary is much smaller than that and excludes them. How can you have a conservation area in a village which is not inside the village boundary? I'd suggest the village settlement boundary needs to extend to cover the new build house at the back of number 25 and 27 and the field leading down to Semmington Brook.			
Attached files (Please see Objective)		4710773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	810	Consultee Mrs Caren Clarke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1120822		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Context. Table 2.2 Settlement Hierarchy Levels of Development			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY & NOT CONSISTENT WITH NATIONAL POLICY</p> <p>Salisbury H3.1 (Netherhampton Road - 640 houses) and Salisbury H3.3 (North of Netherhampton Road - 100 houses) both appear to fall within the small village and civil parish of Netherhampton, (population 493 in 2011) not within the boundary of Salisbury.</p> <p>The Wiltshire Core Strategy states: Small Village - Some modest development may be appropriate to respond to local needs and contribute to the vitality of rural communities, but limited to infill. 740 houses is very far removed from modest development, limited to infill. One of the core principles of the National Planning Policy Framework is, "empowering local people to shape their surroundings". The opportunity to do this has been spectacularly overlooked with just one local public consultation meeting during the summer holiday period being totally inadequate. A site the size of that proposed in Salisbury H3.1 needs to be within the boundary of a principle settlement not a small village. As stated above, the size of the proposed site is totally unsuited to the small village of Netherhampton. Perhaps if the Officers of Wiltshire Council, left their offices in Trowbridge, Devizes and Chippenham and actually spent some time visiting the the south of the county, they would be in a better position to make sensible decisions with regard to future Housing Allocation for the county. A site the size of that proposed in Salisbury H3.1 needs to be within the boundary of a principle settlement not a small village like Netherhampton. In January 2009, 40 years after the Churchfields Industrial Estate began in Salisbury, there were talks to relocate many of the businesses to the Netherhampton Road. The plan was to build housing at Churchfields; a perfect solution to the local shortage and easy access to both amenities in the city and all transportation for the new residents. The business owners had been promised the opportunity to relocate over many years and yet, once the offer became a reality, they chose not to go. Whether this was due to the failure of the Harnham Brunel Link Road or perhaps an increase in rates/rent to Wiltshire Council I do not know but Bookers still stands alone on the new industrial/business park, while the surrounding land stands empty. Wiltshire Council has failed miserably in delivering what was proposed for both Churchfields and the Netherhampton Road; the Salisbury Vision disappeared in a cloud and now, the local residents are being asked to pay the price for these failures. There will be little to attract new residents to Salisbury with the traffic congestion, resultant pollution and lack of beautiful views on approach to the city which will surely be the result of these proposals. Very few of the large businesses based here in Salisbury remain now, with both HPI and Friends Life having shut their offices. What Salisbury does best is Tourism - our beautiful Cathedral, Stonehenge, our Markets all attract visitors but unless new residents want to work within the NHS, the caring profession, retail or hospitality industries, there is little employment available. This means that many more car journeys will be required by new residents to get to their place of work, with many already commuting to London daily; the knock -on effect for the Harnham Gyratory will be nothing short of a nightmare.</p>				

	<p>There is no mention about whether proper consideration has been given to bringing back long term empty dwellings into the housing market or what proportion will be Starter Homes and Social Housing which are surely the most necessary for the hard-working but underpaid local residents. Neither is there an explanation covering when adequate transport provision will be made, where new jobs will come from, what secondary education and medical provision, retail and infrastructure may be included in the plans.</p> <p>What I find most risible is the suggestion that a country park (H3.1 Netherhampton Road) might somehow make the proposals more attractive, when the proposed location is already in an area of existing beautiful and natural countryside!</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>I believe that initial agreement for building in Salisbury, particularly H3.1 Netherhampton Road has already been made and that Wiltshire Council is merely paying lip service to allowing local people to have a say in future housing strategy.</p>

Comment ID:	811	Consultee Mr Andrew Martin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126224		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I do not have the detailed legal knowledge to be able to say that this plan is legal. I have therefore declined to check the legal box. However likewise I am not able to say that is not legal. There should be the option to check a 'don't know' box.</p> <p>p5.115 there is no evidence presented how the proposal will " improve employment opportunities, services and facilities" . There are very few local employment opportunities and the new residents are likely to become commuters to larger towns, including by train from Westbury to places as far away as Bristol and London. This will add an unsustainable traffic burden on local roads given the very limited public transport to Bratton.</p> <p>The only way this plan could potentially be made sound is by halving the number of dwellings, making provision for green space, a childrens' play area, significant woodland screening, and by having road access from both the southern and northern ends of the field..</p> <ol style="list-style-type: none"> 1. The inclusion of this many dwellings and at such a density in this location will have a really damaging impact on the special landscape value of the area and the conservation of Bratton's heritage and history. 2. The proposed development is completely out of place in the location proposed and more appropriate to a town centre setting. 3. The local planning authority has already twice rejected development plans for the site in question and considered that "the edge of the existing village is well defined and that the housing development proposed, together with the access road thereto across the field in front, would be a substantial intrusion into the rural landscape, and would therefore be detrimental to the character and scenic quality of the area." Nothing else has changed in the area so these decisions should still stand. 4) If the plan should be adopted (in any form) then measures must be put in place to restrict HGV and construction traffic from using Court Lane, and attempting the dangerous junction onto the B3098 at Tollgate House. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	812	Consultee Mr David Wraight	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126228		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.128			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The document refers to a transport strategy, but there is no evidence of an effective strategy to increase the transport infrastructure to meet the inevitable congestion caused by the increase in vehicles from the proposed 840 houses and new primary school on the Netherhampton Road site. It is not feasible to widen the existing road or increase capacity on the crossing points of the River Avon at Aylewade Road or Newbridge road. Provision of a southern Salisbury by-pass allowing traffic from the A36 and A338 to by-pass Harnham would make the Wiltshire Housing Site Allocations plan for Netherhampton Road area sound by relieving the congestion from increased local traffic.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	813	Consultee Mr David Wraight	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126228		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.136		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Vague platitudes about a revision of the strategic road network without specific proposals to increase capacity do nothing to cope with the inevitable increase in traffic from the 640 households and new primary school. Existing roads suffer from regular congestion at peak times, particularly at the beginning and end of the school day for the existing schools. The construction of a southern Salisbury by-pass to take through traffic away from the A36 and A338 past Harnham would allow the current roads to cope with local traffic.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	814	Consultee Mr David Wraight	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126228		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.143			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The land allocated for this development regularly floods, and is outside the current flood protection scheme. Run-off from these houses, and from the proposed development to the south of Netherhampton Road would cause much greater risk of flooding in the future and put pressure on the flood prevention scheme further into Harnham, increasing the risk of flooding there.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	815	Consultee Mr Toby King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 893828		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The Whole Plan especially in relation to Trowbridge and surrounding villages		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by one quarter during the Plan period (and more after that) which exceeds the requirement for a five year supply.</p> <p>The Plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion.</p> <p>The Plan is not effective because WC's examination of 'windfall', which is expected to provide 60% of new housing, is grossly inadequate – comprising one page out of 4,500 pages of the Plan documents.</p> <p>The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes</p> <p>The changes that are necessary to the plan are set out precisely in the submissions made by the Trowbridge Town Council (Mr Lance Allan - 06/09/2017) and the Hilperton Gap Action Group (Mr George Bundy - 19/09/2017)</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	816	Consultee C Darby St Modwen Properties	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126246	Person ID:	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.77			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We wish to support the proposed inclusion of the station works site within the settlement boundary of Tisbury - as defined in the Tisbury Community Area Topic Paper.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	817	Consultee Mrs Georgina Lawson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126248		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>1. Not fair or proportional. Netherhampton village has 60 dwellings about to expand to 80, so to have another 740 houses is totally out of proportion.</p> <p>2. Transport. The A3094 plus the Harnham gyratory and the Wilton Wall lights are already working at full capacity. A development of this size would cause traffic chaos.</p> <p>3. Flooding and sewerage. The massive runoff from a development of this size, already on a hill, would cause serious flooding in this area, even more than already occurs.</p> <p>4. Jobs. There are no jobs to the south of the city, so who will live in the houses.</p> <p>5. Noise pollution. In 2014 a smaller proposal of 70 houses/pub/hotel was withdrawn after it was proved that vehicle noise from the A3094 would exceed government guidelines.</p> <p>Unless the above issues (in particular the infrastructure, roads etc) are fully addressed there is no way this proposal should happen.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	818	Consultee Mr Tom Welch	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126254	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my deep concerns regarding the Draft Wiltshire Housing Sites Allocation Plan in Trowbridge. I live on Frome road near the country park next to the Church Lane and Southwick Court sites. I understand these two sites have been put forward as preferred sites within the housing allocation plan. I would like to raise the following concerns:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that the local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environment and historic interest and look to enhance the natural, built and historic environment. I do not believe the current strategy delivers on either the development or infrastructure required by Trowbridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	819	Consultee Mr Tom Welch	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126254	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The council appears to have completely ignored the many brownfield sites available in the town centre. If the mission is to attract more people to live in the town surely the rejuvenation of the available brownfield sites would be the priority? Areas on the town centre are an absolute eyesore, but could so easily be knocked down or converted into wonderful living accommodation. Building on the proposed sites strikes me as just being a short-sighted fix to a long term problem and is not sustainable. I am of the understanding a private individual has applied at least twice in the past to build on the site boarding Frome Road, Southwick country park and Church Lane but has been refused the permission. It strikes me as outrageous this greenfield site which has had planning permission previously denied is now a site proposed by the council!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	820	Consultee Mr Tom Welch	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126254		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from the sites 3565, 3620 and 1021</p> <p>The A361 is an accident blackspot and already at capacity during 'rush hours'. The proposed access point will only make the matter worse. The road will not be able to support the extra traffic and will be extremely dangerous! The sites at Church lane, Southwick court and Old Brickfields are being considered as it is believed they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles). Surely the most logical way to reduce traffic is to develop the previously mentioned brownfield sites already in the town centre! No evidence has been provided to support the theory (as it is just a theory) that people will walk into town rather than driving. In fact, I can tell you many people who live in the area drive into town as they generally go in for food shopping etc and would rather drive than carry all the bags home.</p> <p>The distance from the property I live in is over 1.5 miles to the town centre, that is a 3-mile round trip, this is too far for many members of the aging population to consider a walkable distance. With the number of new houses you are proposing in the area, if you work off the estimate that each house has two cars there could easily be an addition 400 cars travelling on the already congested Frome Road. The Council's view that this is justified as it provides sustainable development is clearly in question. There is not the infrastructure in place for a development of this size.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	821	Consultee Mr Tom Welch Person ID: 1126254	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Accessibility from the sites 3565, 3620 and 1021 The A361 is an accident blackspot and already at capacity during 'rush hours'. The proposed access point will only make the matter worse. The road will not be able to support the extra traffic and will be extremely dangerous! The sites at Church lane, Southwick court and Old Brickfields are being considered as it is believed they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles). Surely the most logical way to reduce traffic is to develop the previously mentioned brownfield sites already in the town centre! No evidence has been provided to support the theory (as it is just a theory) that people will walk into town rather than driving. In fact, I can tell you many people who live in the area drive into town as they generally go in for food shopping etc and would rather drive than carry all the bags home. The distance from the property I live in is over 1.5 miles to the town centre, that is a 3-mile round trip, this is too far for many members of the aging population to consider a walkable distance. With the number of new houses you are proposing in the area, if you work off the estimate that each house has two cars there could easily be an addition 400 cars travelling on the already congested Frome Road. The Council's view that this is justified as it provides sustainable development is clearly in question. There is not the infrastructure in place for a development of this size.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	822	Consultee Mr Tom Welch Person ID: 1126254	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Accessibility from the sites 3565, 3620 and 1021 The A361 is an accident blackspot and already at capacity during 'rush hours'. The proposed access point will only make the matter worse. The road will not be able to support the extra traffic and will be extremely dangerous! The sites at Church lane, Southwick court and Old Brickfields are being considered as it is believed they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles). Surely the most logical way to reduce traffic is to develop the previously mentioned brownfield sites already in the town centre! No evidence has been provided to support the theory (as it is just a theory) that people will walk into town rather than driving. In fact, I can tell you many people who live in the area drive into town as they generally go in for food shopping etc and would rather drive than carry all the bags home. The distance from the property I live in is over 1.5 miles to the town centre, that is a 3-mile round trip, this is too far for many members of the aging population to consider a walkable distance. With the number of new houses you are proposing in the area, if you work off the estimate that each house has two cars there could easily be an addition 400 cars travelling on the already congested Frome Road. The Council's view that this is justified as it provides sustainable development is clearly in question. There is not the infrastructure in place for a development of this size.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	823	Consultee Mr Tom Welch	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126254	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620</p> <p>The Fields behind Church Lane, Frome Road and Oldbrick Fields are well known as habitats for many deer, foraging rare (and protected) bats, rabbits, voles and a host of birds. The ancient hedgerows and fields provide the setting for many listed building as well as an archaeological site of an ancient water meadow. These require protection as stated in the National Planning Framework and the Core Strategy itself! It seems such a shame that the council are content to build on these greenfield sites which provide such a necessary home to wildlife as it is easier than regenerating areas in the town which are in desperate need.</p> <p>Thank you for reading this letter, I hope the points I have raised (that are echoed by many in the area) are taken into consideration</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	824	Consultee Mr Tom Welch	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126254		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620</p> <p>The Fields behind Church Lane, Frome Road and Oldbrick Fields are well known as habitats for many deer, foraging rare (and protected) bats, rabbits, voles and a host of birds. The ancient hedgerows and fields provide the setting for many listed building as well as an archaeological site of an ancient water meadow. These require protection as stated in the National Planning Framework and the Core Strategy itself! It seems such a shame that the council are content to build on these greenfield sites which provide such a necessary home to wildlife as it is easier than regenerating areas in the town which are in desperate need.</p> <p>Thank you for reading this letter, I hope the points I have raised (that are echoed by many in the area) are taken into consideration</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	825	Consultee Mrs Mary Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125482	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>H3.3 is on the flood plain of the river Nadder and has a boundary on a housing area already liable to flooding despite 2008 flood protection reinforcements.</p> <p>The size of the development of H3.1 on the hilly higher ground across the road will impact on the valley water table of H3.3. I do not believe that the Environment Agency could have been properly consulted and agree to such developments. I would like to see the report of the Environment Agency and their views on mitigating the flood risks at H3.1 and H3.3. I understand that housing development on a floodplain or in areas liable to flooding can only be considered if there are no other sites suitable for development.</p> <p>I see no reference to exploring further development on the north side of the city at Old Sarum where there is no flood risk. We need more housing in Wiltshire but I note that H3.1 and H3.3 developments total far more houses than is being considered for any housing development elsewhere in Wiltshire so this is not justified.</p> <p>I see no considerations of other sites for housing development in Salisbury eg at Old Sarum, or brownfield sites at Churchfields, at the Maltings. The Environment Agency has already assessed the flood risk at the latter 2.</p> <p>I do not agree that there is employment or that this can be created in Salisbury on the south side of the city. Thus the residents of the developments will need to commute to the north of Salisbury or to Southampton adding to the traffic saturation already present on the Nethampton Rd. The Salisbury transport plan has not delivered improvements to date on this.</p> <p>The plans for H3.3 and H3.1 cannot be justified until there is clear reporting from the Environment Agency on these being the preferable sites in Salisbury for housing development.</p> <p>Highways for England needs to report on the traffic implications so that Salisbury Transport Plan can be re examined</p> <p>I have lived on the floodplain of the river Nadder for 23 yrs. I would like a full assessment from the Environment Agency about the flood risks. Surface water flows and flooding has been improved with the Environment agency flood defence work in 2008, but we continue to have drainage problems when water levels in the River Nadder and ground water levels are high. This has been exacerbated by the small housing development of Buttercup Close, Middle Street, which occurred without improvement to the drains so that these have to be pumped out by a tanker on a regular basis.</p> <p>The H3.3 site suffers regularly from surface water logging with heavy rainfall, and I cannot believe that the Environment Agency have been properly consulted and agreed to the proposal for 100 houses there against the principles stated in Wiltshire Core strategy to prevent development on our flood plains.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you	I would like the planning inspectors to understand my views properly.				

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	826	Consultee mr Nicholas Weeks	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126249		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge area			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan is unsound as Trowbridge does not have the infrastructure for the increased traffic. The traffic into Trowbridge as it is now is more than the system can cope with.</p> <p>The local villages will become part of a greater Trowbridge and lose their identity. Local schools in these villages are already over subscribed.</p> <p>The fields surrounding North Bradley has numerous colonies of bats which will be disturbed and move on.</p> <p>The fields between Trowbridge and North Bradley flood regularly.</p> <p>There are many commercial property sites within the town that could be changed to housing. Eg The ex Bowyers site is derelict and has had several plans for sports and social building either rejected or not taken up. Shops in the town are closing at an alarming rate, the shires has quite a few premises empty. There is out of town shopping so perhaps the time has come to build housing within the town and replace these un-used commercial properties. Rather than building on green field sites.</p> <p>Use brown field sites for housing within and surrounding areas of Trowbridge.</p> <p>White horse business park empty buildings. The old Virgin building, the Bowyers site.</p> <p>Why building has stopped at Leap Gate. This was in the main Structure Plan and has been stopped!!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	827	Consultee L A G Young	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126264	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a lifelong resident in Netherhampton Rd for 80 years I have seen many changes in my lifetime around me BUT never a greedy amount of housing proposed. Please do not build more houses along the country fields taking farmland away AND wildlife needed for human life to produce food etc NO NO NO plus more traffic, I can see many accidents happening we already have enormous amounts of traffic, transporters, emergency services including ambulances which regularly use this road and police. To keep safety, happiness, wellbeing for good health to residents young and old of which there are many - NO NO NO. ps Field DO flood.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	828	Consultee Mrs Gill Rattue	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126265	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Netherhampton Village has 60 dwellings so the proposal for a further 740 houses is totally out of proportion. The road (3094) plus the Harnham gyratory and the Wilton Wall lights are already operating at full capacity. A development of this size would cause traffic chaos in this and surrounding areas. The massive run off from a development of this size would cause serious flooding in this area. None of these issues have been addressed in this proposal. Unless the above issues (in particular the matter of local roads) are fully addressed this proposal should not go ahead.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	829	Consultee Mrs Gill Rattue	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126265	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Netherhampton Village has 60 dwellings so the proposal for a further 740 houses is totally out of proportion. The road (3094) plus the Harnham gyratory and the Wilton Wall lights are already operating at full capacity. A development of this size would cause traffic chaos in this and surrounding areas. The massive run off from a development of this size would cause serious flooding in this area. None of these issues have been addressed in this proposal. Unless the above issues (in particular the matter of local roads) are fully addressed this proposal should not go ahead.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	830	Consultee Mrs Gill Rattue	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126265	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Netherhampton Village has 60 dwellings so the proposal for a further 740 houses is totally out of proportion. The road (3094) plus the Harnham gyratory and the Wilton Wall lights are already operating at full capacity. A development of this size would cause traffic chaos in this and surrounding areas. The massive run off from a development of this size would cause serious flooding in this area. None of these issues have been addressed in this proposal. Unless the above issues (in particular the matter of local roads) are fully addressed this proposal should not go ahead.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	831	Consultee Dr Gary Henry Person ID: 1125248	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site 3260 – Land at Upper Studley			Effective	
		This is in relation to Site 3260 – Land at Upper Studley only. Points raised are quoted directly from: WHSA PSCONS09K Wiltshire Housing Site Allocations Plan SA Rpt Annex 1 - A.9. _ Trowbridge CAR June 2017 supplemented by my comments in italics: Archaeological Records indicate that the land has medium/high archaeological potential, with possible medieval remains within the vicinity of the site. The landscape type is characterised by former post-medieval water meadows which are partially legible in modernity. Water meadows are rare and can be locally significant contributors to landscape character. The landscape type is described as meadows/water meadows which are rare. In combination with other constraints, the developable area of the site would need to be reduced. The proposed number of dwellings at site 3260 will have to be reduced, as noted by the report. So there is very little to gain and much to lose in the construction of property on this site. Inclusion of this site plan is neither justified (too small, not cost effective) or effective (more detrimental to natural surroundings, expensive to mitigate against risk of flooding) and puts pressure on local services and transport system.			
Attached files (Please see Objective)	4706480				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	832	Consultee Dr Gary Henry Person ID: 1125248	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
					Do you consider the draft WHSAP is sound?
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 3260 – Land at Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>This is in relation to Site 3260 – Land at Upper Studley only.</p> <p>Points raised are quoted directly from:</p> <p>WHSA PSCONS09K Wiltshire Housing Site Allocations Plan SA Rpt Annex 1 - A.9. _ Trowbridge CAR June 2017</p> <p>supplemented by my comments in italics:</p> <p>Flooding risk</p> <p>Existing foul water infrastructure crosses the site and there would be limited space to divert sewers.</p> <p>The sloping nature of the site could make surface water attenuation challenging</p> <p>(NOTE : the soil is predominantly clay and so drains very slowly. Significant flooding occurred where the Lambrok Stream meets 44-45 Spring Meadows after a storm hit during the final phases of construction of Spring Meadows. The water persisted for several days. There is also evidence of ground water having affected properties along Boundary Walk)</p> <p>Due to the presence of the Lambrok Stream and its floodplain, consideration should be given to the inclusion of a sustainable drainage system within any subsequent planning application process to control the risk of surface water flooding from impermeable surfaces.</p> <p>The site is situated in Flood Zones 1, 2 and 3. Surface water drainage patterns are such that the development of the site would need to consider potential impacts on the areal extent of flood zones associated with Lambrok Stream.</p> <p>In addition, as the site slopes down to the Lambrok Stream, achieving suitable surface water attenuation measures, particularly at greenfield infiltration rates may be challenging.</p> <p>Whilst challenging to achieve, the site would nonetheless need to positively manage surface water. To achieve such works it is likely that the net developable area would need to be reduced.</p>			

	The proposed number of dwellings at site 3260 will have to be reduced, as noted by the report. So there is very little to gain and much to lose in the construction of property on this site. Inclusion of this site plan is neither justified (too small, not cost effective) or effective (more detrimental to natural surroundings, expensive to mitigate against risk of flooding) and puts pressure on local services and transport system.
Attached files (Please see Objective)	4706480
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	833	Consultee Dr Gary Henry Person ID: 1125248	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site 3260 – Land at Upper Studley			Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is in relation to Site 3260 – Land at Upper Studley only.</p> <p>Points raised are quoted directly from: WHSA PSCONS09K Wiltshire Housing Site Allocations Plan SA Rpt Annex 1 - A.9. _ Trowbridge CAR June 2017 supplemented by my comments in <i>italics</i>:</p> <p>Impact on infrastructure Access to a range of local/town centre services and facilities would be achievable via walking, cycling and buses. <u><i>There is no supermarket within walking distance that can serve the needs of a family shopping spree. A car would be needed to drive into town (e.g. to Tesco). The nearby A361 Frome Road currently gets congested in the rush hours and adding side access to this busy road will make matters much worse.</i></u></p> <p>.. access to a limited range of convenience shops and facilities within the local area Developers of the site could also assist in providing opportunities to improve local air quality through making purchaser/future occupiers aware of Car Share Wiltshire <u><i>(I very much doubt car sharing will occur on new estates. What evidence is there for this?)</i></u></p> <p>... marginally boost the local supply of affordable homes <u><i>(note the use of 'marginal')</i></u></p> <p>The proposed number of dwellings at site 3260 will have to be reduced, as noted by the report. So there is very little to gain and much to lose in the construction of property on this site. Inclusion of this site plan is neither justified (too small, not cost effective) or effective (more detrimental to natural surroundings, expensive to mitigate against risk of flooding) and puts pressure on local services and transport system.</p>				
Attached files (Please see Objective)	4706480				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	834	Consultee Dr Gary Henry Person ID: 1125248	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site 3260 – Land at Upper Studley			Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is in relation to Site 3260 – Land at Upper Studley only.</p> <p>Points raised are quoted directly from: WHSA PSCONS09K Wiltshire Housing Site Allocations Plan SA Rpt Annex 1 - A.9. _ Trowbridge CAR June 2017 supplemented by my comments in <i>italics</i>: there is a GP surgery capacity deficit locally. Development on this site (and others at the town) would result in additional demand on the local health service and according to the evidence available to date there is a capacity gap at the local surgeries. <u>Access to nearest surgery will not be a convenient walking distance.</u></p> <p>The proposed number of dwellings at site 3260 will have to be reduced, as noted by the report. So there is very little to gain and much to lose in the construction of property on this site. Inclusion of this site plan is neither justified (too small, not cost effective) or effective (more detrimental to natural surroundings, expensive to mitigate against risk of flooding) and puts pressure on local services and transport system.</p>				
Attached files (Please see Objective)	4706480				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	835	Consultee Christine and Patrick Johnson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126276	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We wish to object very strongly to the proposal to build on the land to the South and West of Elizabeth Way on what is known as the Hilperton Gap. Building on this site will make Hilperton just a suburb of Trowbridge rather than a village in it's own right and will set a precedent for completely closing off the green space that surrounds the town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	836	Consultee Christine and Patrick Johnson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126276	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Trowbridge itself has a good many derelict brownfield sites which should be redeveloped in their entirety before using greenfield land. The town is in dire need of regeneration and this could be the catalyst that is needed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	837	Consultee Christine and Patrick Johnson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126276	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Quite apart from these considerations, The large areas of new housing that are being built do not seem to make any provision for new health and medical facilities for the vast influx of new residents in the area, resulting in existing facilities struggling to cope. We trust you will take our views into account and reject this plan outright.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	838	Consultee Dr Gary Henry Person ID: 1125248	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Site 3260 – Land at Upper Studley				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is in relation to Site 3260 – Land at Upper Studley only.</p> <p>Points raised are quoted directly from:</p> <p>WHSA PSCONS09K Wiltshire Housing Site Allocations Plan SA Rpt Annex 1 - A.9. _ Trowbridge CAR June 2017</p> <p>supplemented by my comments in <i>italics</i>:</p> <p>Due to the issues with secondary school capacity in the short to medium term, the site would have a moderate adverse effect</p> <p>The proposed number of dwellings at site 3260 will have to be reduced, as noted by the report. So there is very little to gain and much to lose in the construction of property on this site. Inclusion of this site plan is neither justified (too small, not cost effective) or effective (more detrimental to natural surroundings, expensive to mitigate against risk of flooding) and puts pressure on local services and transport system.</p>				
Attached files (Please see Objective)	4706480				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	839	Consultee Dr Philippa Ridley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126280	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ol style="list-style-type: none"> 1. The number of houses is ridiculous for our tiny village. 2. The main problem is infrastructure - the A3094 is already busy. The Harnham gyratory only allows 4 cars to pass from the Harnham side during one green light during rush hour and is already overloaded with traffic. 3. Netherhampton play park is less than 1 metre from the side of the A3094 - with NO BARRIER AT ALL - so increased traffic would be dangerous. 4. Noise pollution would be increased. 5. Why build 700 houses to the south of the city where there are no new businesses - it makes no sense. 6. No infrastructure - already poor drainage and sewerage in this area. 7. No new GP surgeries/school placements. <p>Completely unsound and unsafe as per my points in part 6.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	840	Consultee Mrs Judith Howles Person ID: 1120809	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
					Do you consider the draft WHSAP is sound?
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.3 site north of Netherhampton Road			Justified	
			Effective		
			Consistent with national policy		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan has not sought to identify sites which best utilise existing infrastructure. It has not justified the selection of this site given the lack of capacity of the A3094 to accommodate additional traffic and the sustainability appraisal is flawed in its assessment of the magnitude of positive and adverse effects of developing this site. The site is not sustainable owing to the lack of adequate infrastructure and the potential to increase flood risk. It will encourage car use as it is not well served by public transport.</p> <p>The plan seeks to concentrate development in the principal settlements but in the Salisbury area, employment patterns are more dispersed. (these range from large employers such as Porton Down to the numerous conversions of farm buildings to business purposes) Also modern lifestyles with an increase in remote working and internet shopping reduces the need for development to be concentrated in large sites on the edge of towns. A more dispersed pattern allowing more development in villages would have less landscape impact and make better use of existing resources. The configuration of Salisbury as a convergence of routes at the confluence of several rivers and enclosed by hills makes any expansion of the settlement difficult without significant impacts in terms of landscape setting and heritage, traffic congestion and reduction in air quality, flood risk and drainage. A more thorough appraisal of existing infrastructure should be undertaken and a detailed updated transport strategy should be published before greenfield sites with no existing infrastructure are allocated. The existence of a ring of park and ride sites lends itself to satellite development leaving green space around the city.</p> <p>Together with the proposed allocation at H3.1 it will have a significant impact upon the A3094 in terms of traffic volumes, congestion and air quality during both the construction phase and when development is completed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Possibly - to challenge the assumptions that have been made unless further detail of drainage and highway improvements are provided prior to the Examination.				

Comment ID:	841	Consultee Mrs Harriet McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125265		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Site nos H3.1 and H3.3	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <ul style="list-style-type: none"> The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”. Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.” 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”				

Comment ID:	842	Consultee Mrs Harriet McGuire Person ID: 1125265	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos H3.1 and H3.3		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>INSUFFICIENT TRANSPORT & GREENINFRASTRUCTURE</p> <ul style="list-style-type: none"> • Para 5.128 of the Draft Allocation Plan says: “The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS”. This is simply not true. • The “Salisbury Transport Strategy” (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed. • Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: • “Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy.” • It should also be noted that such “Salisbury Transport Strategy” as exists is not detailed and has never been subject to public consultation or formal adoption. • Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end. • We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague “solutions” should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through. • There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess. 				

	<ul style="list-style-type: none"> • We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all. • Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>"The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan."</p>

Comment ID:	843	Consultee Mrs Harriet McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125265		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos H3.1 and H3.3		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>FLOOD & SEWAGE IMPACT</p> <ul style="list-style-type: none"> • Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites. • Site S1027 is well known locally for having standing water regularly during the winter. • There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		<p>“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”</p>			

Comment ID:	844	Consultee Mrs Harriet McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125265		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	NOISE <ul style="list-style-type: none"> • A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”				

Comment ID:	845	Consultee Mrs Harriet McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125265		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos H3.1 and H3.3		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLAWED PROCESS</p> <ul style="list-style-type: none"> • We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process. • The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed. • The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan. • The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”				

Comment ID:	846	Consultee Mrs Harriet McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125265		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>VISUAL AMENITY / HERITAGE LANDSCAPE</p> <ul style="list-style-type: none"> The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>"The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan."</p>				

Comment ID:	847	Consultee Mrs Harriet McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125265		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos H3.1 and H3.3		Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GENERALLY ILLOGICAL</p> <ul style="list-style-type: none"> • No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school. • The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”</p>				

Comment ID:	848	Consultee Lady Carola Thorpe Person ID: 1126286	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am a member of the Neighbourhood Plan Steering Group and a Resident of Seend. We have recently been asked to respond to your proposed changes to our settlement boundary. The Parish Council and the NP Steering Group have written a response with which I do not agree on some points, so am sending you this as my personal response. As you will see from the document below, I would appreciate answers to the queries I raise about the rationale behind the changes.(in blue).</p> <p>Changes to Settlement Boundaries in Seend Village from Carola Thorpe, July 2017.</p> <p>To the south east: here the new boundary moves to the north of the A361, leaving all of Seend Park outside the settlement boundary. What is the rationale for this and for excluding the other houses going east along the A361? K6</p> <p>Beech House and all the houses and buildings to the west have been newly included in the settlement boundary. Half the gardens of three houses are excluded from the settlement area. This is presumably to prevent the popular practice of selling garden areas for house building. If this is so I look on this as a favorable protective change. Is this correct? J7</p> <p>As the new boundary progresses west it remains close to the buildings excluding the land that belongs to them, again I imagine with a similar aim.</p> <p>As the new boundary reaches the end of the Manor walled gardens and reaches Church Lane, it deviates to exclude the walled area owned by the Clarkes of Saltwood. (Not the present owners of the Manor, also called Clark!) Is this to prevent infill? I8</p> <p>It then progresses west, surrounding the churchyard and Seend House and the garden to the south, but then excludes the wooded area and lodge to the north of the house. This also seems a protective measure to an area of possible development if left within the settlement boundary. Is this so? H8</p> <p>The last significant change at the west end of the A361, is to include the car park at the Bell Inn within the settlement boundary. This will presumably make it easier to obtain planning permission, which I am not against in principle in this location, as the corner is already built on. G&F8</p> <p>The new boundary then follows the line of the existing one north across the A361 towards Bollands Hill.</p> <p>It turns east at the top of School Lane, with a very small deviation before heading east along the footpath at the back of Somerset Close, but soon leaves the footpath.</p> <p>It continues east to the north of Dial Close, with the length of those gardens cut in half as at present. Again I assume the rationale is as on the south side, to prevent folk selling a portion for house building. Is this so?</p> <p>Then a change occurs which means the WI allotments are excluded from the settlement, thereby preventing it being used for housing and protecting the allotments. Is this assumption correct? H6</p> <p>The final significant change is the exclusion of the Lye Field, including the tennis courts. Why has this change been made? I6&7</p>				

	In conclusion: If the rationale behind all these changes is to protect the rural character of this part of the Parish, they would seem broadly helpful. The other 2 settlements do not have settlement boundaries.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	849	Consultee Lisa Dent Crudwell Parish Council	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126295	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is important to differentiate between the village of Crudwell and the designated area for the Neighbourhood plan which is the Parish. The Parish Council believes the village has been described as Large because it has two Hotels, two Pubs, a large lorry haulage yard, a car sales and servicing facility and a School. Many farms surround the Village farms. The village has about 250 dwellings</p> <p>Crudwell Parish Council has in the past supported the introduction of new build housing projects as a means of sustaining the viability of the village and will continue to do so in the future. With the introduction of small estates every few years the character of the village has not been spoilt and the Conservation area has not been threatened. The centre of the village has been developed from the A429 and the rural feel of the village has been maintained. Ridgeway Farm had been submitted to Wiltshire Council back in 2014. That application drew much local opposition from local people, principally on the grounds of the scale of the development, it being outside the designated red line settlement boundary, and its likely impact on the local infrastructure, specifically: the likely increased traffic on Tetbury Lane; impacts on already overburdened drainage and sewerage systems and oversubscription of Crudwell Primary School.</p> <p>It is clear there is a lot of local opposition to having a site allocation plan forced on the village. Over a hundred parishioners turned up at the last Area Board meeting to voice their opinion and over £5000 was raised in a fortnight to engage a consultant to put the villages case to an Inspector. 2</p> <p>Whilst it is understood that Wiltshire Council needs to ensure an adequate five year housing land supply across each housing market area, the Site Allocations Plan would result in an oversupply of 4,284 dwellings to 2026 when past completions are combined with deliverable commitments, and windfall sites are included. Even when windfalls are excluded, the oversupply is still 2,198 dwellings across the Housing Market Area.</p> <p>The Site Allocations Plan also results in an oversupply of homes in the Malmesbury Community Area, even without windfalls. Wiltshire Council has a history of oversupply of homes in the former North Wilts area excluding Chippenham. In eight of the last ten years more homes have been built than planned, in the other two years targets were virtually met. In fact over the last ten years the average oversupply has been 143% higher than planned.</p> <p>On this basis, there is no strategic need to identify any new homes at Crudwell, so the Wiltshire Site Allocations Plan should not do so. This Parish Council believes that this plan if adopted will set a planning precedent that will be impossible to manage, it being outside the designated red line settlement boundary.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	850	Consultee Lisa Dent Crudwell Parish Council	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126295	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	A major concern to Parishioners is the risk of flooding which happens to properties around the Swillbrook which runs through the centre of the village. Significant damage has occurred to many houses in the village in recent years both through surface water and raw sewerage. Surface water from the proposed site would make this situation far worse. We must not overlook the fact that many properties around the school and(former) post office green as far up the A429 as The Butts estate already need non-return valves to stay safe from sewerage flooding until the excess over capacity subsides. In addition, sewerage frequently exudes from all the manhole covers around the PO Green in Tuners Lane due to the lack of Pumping Station capacity , even during only moderate rainfall. The Council have been contacted by Hankerton Parish Council expressing their concern over the increase in Sewerage this plan would bring to their own pumping station as it barely copes at present. In Conclusion Crudwell Parish Council is surprised a Development as large as this is proposed in a small village with a significant conservation area which already has a School which is full, an identified Sewerage and Drainage problem, has no shop and a bus service which at best is poor and is planned to be reduced. We believe the village has the opportunity through its emerging Neighbourhood Plan to define its own future.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	851	Consultee Mr Benjamin McGuire Person ID: 1125268	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE</p> <p>Para 5.128 of the Draft Allocation Plan says: "The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS". This is simply not true.</p> <p>The "Salisbury Transport Strategy" (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed.</p> <p>Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: "Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy."</p> <p>It should also be noted that such "Salisbury Transport Strategy" as exists is not detailed and has never been subject to public consultation or formal adoption.</p> <p>Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end.</p> <p>We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague "solutions" should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through.</p> <p>There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess.</p> <p>We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all.</p> <p>Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.

Comment ID:	852	Consultee Mr Benjamin McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125268		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLOOD & SEWAGE IMPACT</p> <p>Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites.</p> <p>Site S1027 is well known locally for having standing water regularly during the winter.</p> <p>There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	853	Consultee Mr Benjamin McGuire	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125268	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>NOISE A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	854	Consultee Mr Benjamin McGuire	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125268		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLAWED PROCESS</p> <p>We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process.</p> <p>The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed.</p> <p>The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan.</p> <p>The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	855	Consultee Mr Benjamin McGuire	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125268	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>VISUAL AMENITY / HERITAGE LANDSCAPE</p> <p>The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	856	Consultee Mr Benjamin McGuire	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125268	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GENERALLY ILLOGICAL</p> <p>No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school. The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	857	Consultee Mr Christopher Wickham Partner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Christopher Wickham Associates Person ID: 378124		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.53 Proposed amendments to the settlement boundary for Chapmanslade			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed amendment to the settlement boundary of Chapmanslade should include Green Farm Industrial Estate and an associated plot because this land forms a functional, physical, visual and contiguous part of the village, and is located on the High Street at the geographical centre of the village. The omission of this site, based on the methodology in Topic Paper 1, is unjustified. The methodology, which omits employment sites on the edge of larger villages, is considered to be flawed and at odds with the NPPF. In any event, the site is not located at the edge of the village. Please see attached detailed representations. Green Farm Industrial Estate and an associated plot should be included within the amended settlement boundary of Chapmanslade because this previously developed land forms a functional, physical, visual and contiguous part of the village. As a result of this amendment, the settlement boundary would properly reflect the established developed extent of this part of the village. Please see attached detailed representations.				
Attached files (Please see Objective)	4710663				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order that the issues raised in the attached representations can be fully elaborated.				

Comment ID:	858	Consultee Mr Colin Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125356	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1) The Plans are Disproportionate: The proposed number of dwellings (740) in Netherhampton alone are far in excess of the shortfall in housing projected for the whole of South Wiltshire (594) This is completely disproportionate for a small community with limited transport and infrastructure. Full consultation necessary with Environment Agency, Highways Agency, Wessex Water, Natural England, Heritage England.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure the above points are taken into consideration.				

Comment ID:	859	Consultee Mrs Christine Bennett	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126268		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1,H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>H3.1 & H 3.3 Netherhampton Road - both sites It does not fully consider the implications of additional traffic in the Harnham area: pollution and congestion. It acknowledges that further investigations would be needed but Netherhampton Road could not be widened effectively in the urban sections because of the number of houses that would be affected. The long-term impact of more vehicles and more loss of rural land would be harmful to the approaches to the area and the distinctive cathedral views. Flooding in the area, especially North of Netherhampton Road, would be a problem. H.3.1 Reduce the number of houses planned and the area designated to under 200 houses. H 3.3 -North of Netherhampton Road Remove this option completely. Overall, I can see that the authority is attempting to comply with government dictats, but I am unsure about the need for so many houses in the Salisbury area. Many new residents would have to commute elsewhere for work and this too would contribute to congested roads. Aesthetics also need to be considered. The removal of so much rural land and open spaces would be detrimental - in particular, altering the approach to Salisbury along Netherhampton Road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	860	Consultee Mrs Marjorie Kilpatrick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 703974	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My concerns and objections to the proposed development of 40 houses in Bratton..</p> <ol style="list-style-type: none"> 1. Access onto the Westbury Main road. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	861	Consultee Mrs Marjorie Kilpatrick	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 703974		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My concerns and objections to the proposed development of 40 houses in Bratton.. 2 The village school would probably have to be expanded.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	862	Consultee Mrs Marjorie Kilpatrick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 703974	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My concerns and objections to the proposed development of 40 houses in Bratton.. 3 The medical facilities are already over subscribed with all the building taking place in Westbury				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	863	Consultee Mrs Marjorie Kilpatrick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 703974	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My concerns and objections to the proposed development of 40 houses in Bratton..</p> <p>4 The traffic on Court Lane would be vastly increased. It is already being used as "A RAT RUN" The access from my drive onto the Lane is at times hazardous with motorists who ignore the 30mph,.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	864	Consultee Mrs Marjorie Kilpatrick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 703974	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My concerns and objections to the proposed development of 40 houses in Bratton.. I feel that Bratton will lose the Village status and will become almost a suburb of Westbury.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	865	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.19			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The housing proposed is in Netherhampton Parish and in the South Western Wiltshire Community Area. There is no apparent link with Salisbury (other than geographical proximity) which cannot be effective.</p> <p>There is no proposal to extend the settlement boundary for Salisbury to include this proposed housing area and para 4.15 of the WCS indicates that development outside the settlement boundary will be strictly controlled. There has been insufficient thought given to the implications of increasing the scale of housing in Netherhampton Parish, and outside Salisbury's settlement boundary, in the manner proposed.</p> <p>There is reference in WCS para 4.15 to a community-led Neighbourhood planning process which might review the settlement boundary, but no indication how this might work when the community is Netherhampton parish and the settlement is (presumably) Salisbury.</p> <p>There needs to be a major rethink regarding how the development of a settlement (such as Salisbury) which spans multiple parishes and multiple Community Areas can be effectively managed at a community and city level. As they stand the housing proposals suggested in Fig 5.19 and Policy H3.1 are not justified and not effective.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>There needs to be the opportunity for this major proposal to be examined in the public arena to take account of many concerns which will be raised - the relationship to Salisbury and the village of Netherhampton is considered above, but there are others including Transport, Green Infrastructure, Landscape, Education, Drainage, Health & Retail/Leisure infrastructure etc which need to be addressed.</p>				

Comment ID:	866	Consultee Philip and Jane de Ternant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My wife and I have lived in Crudwell for 19 happy years with our daughter being born 2 weeks after we moved into the village. So we do count ourselves now as being local with a real understanding and passion for the village life of Crudwell. During this time we have seen many changes, which include the closure of the village shop, the move of the village Post Office to the local pub with a restricted service being open just 2.5 days per week. The village school is a lovely community school and our daughter enjoyed her education there. With it now being at full capacity with no room we understand for expansion, where would the children from these additional houses go?</p> <p>There are many dog owners within the village and unfortunately the dog fouling issue has become worse with irresponsible owners leaving the dog mess on public paths. Currently there are not enough dog bins around the village (2 in total), with new houses will come new dogs, so at least an extra 3 bins would need to be positioned around the village to encourage owners new and current to discard of their dogs mess.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	867	Consultee Philip and Jane de Ternant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are aware of and have no opposition to the 10 new houses being built at Ridgeway Farm however we have now been informed of the new plans to add an additional 40 houses to this development, which we do strongly oppose. This would equate to an increase of 20% in dwellings to Crudwell and we list below a number of the reasons why we oppose this increase below.</p> <p>We are not opposed to village development, however we do feel strongly that new houses should be positioned at more suitable locations and in smaller numbers. Crudwell has begun, as you may know the process of producing a Neighbourhood Plan, which we fully support to determine what local needs for housing exist and how they should be met.</p> <p>We do hope our opposition to this additional development is read, shared and indeed considered before any further steps are taken in a hope that it will be over turned.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	868	Consultee Philip and Jane de Ternant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Tetbury Lane is already a busy narrow lane with cars often speeding up and down whilst children, horse riders, cyclists and other pedestrians travel up to the village park and fields; with an additional 50 to 100 cars (minimum) on this road, much of it without a pathway, the increased dangers to many would be high, with a serious accident just waiting to happen</p> <p>The main village through road the A429 is again a busy road and is often very difficult to get onto, especially in the mornings. With the additional cars in Tetbury Lane this would cause more problems and congestion.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	869	Consultee Philip and Jane de Ternant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are many dog owners within the village and unfortunately the dog fouling issue has become worse with irresponsible owners leaving the dog mess on public paths. Currently there are not enough dog bins around the village (2 in total), with new houses will come new dogs, so at least an extra 3 bins would need to be positioned around the village to encourage owners new and current to discard of their dogs mess.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	870	Consultee Mr. Stephen Lloyd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126317		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14, Court Orchard/Cassways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The proposal is not in line with the Wiltshire strategic plan for housing. It does not address the needs of Bratton as identified in the Housing Survey of 2014. This development would require substantial modification to the B3098, in order to provide a safe and workable access. Access from the lower, Northern, end of the site would be preferable, but still increase traffic flow considerably on very narrow lanes. There is no public footpath running from the Court Orchard area to this site, alongside the North of the B3098. The B3098 is narrow in this location, and any pedestrian traffic would be hazardous in the extreme. We do not want to encourage the use of cars for short journeys to shop and schools.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	871	Consultee Ms Margaret Willmot Person ID: 378123	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Policy H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is no evidence that transport network improvements can be undertaken which will accommodate the scale of development being proposed. It should be noted that the Salisbury Transport Strategy Summary (STSS) showed no strategic sites to the south of the river (STSS, Figure 1.1), and yet in the 2026 'Business as Usual' scenario the Harnham Gyratory was assessed as being category 'red' – operating over 70% capacity or with two or more arms operating in excess of 90% capacity (STSS Figures 3.2 & 5.1). Exeter Street, College and St Marks roundabouts and Park Wall junction were similarly assessed as 'red' in this forecast, and all would be subject to extra traffic with the scale and location of developments being proposed. With additional housing south of the river there will inevitably be an increase in traffic and congestion at all these locations, compounded if there is a continuing reluctance to implement actions which are recommended in the Salisbury Transport Strategy Options Assessment Report.</p> <p>Without any evidence to the contrary it would seem that this development is unsound and not consistent with national policy, because the NPPF indicates that development should be “prevented or refused on transport grounds where the residual cumulative impacts of development are severe” (NPPF para 32).</p> <p>Salisbury is already an Air Quality Management Area (AQMA) with persistent exceedances of EU limits in respect of NO2 recorded at a number of locations. Any assessment of the combined traffic impact of the proposed sites south of the river will also need to be mindful of the impact on City Centre Air Quality. The latest report available on http://www.wiltshireairquality.org.uk/reports is the 2017 Air Quality Annual Status Report (ASR). This shows that an annual mean bias adjusted reading for NO2 at diffusion tube site P16/49 at 91 Exeter Street was 44 µg/m3, which is above the EU limit of 40 µg/m3. Developments to the south of the river which lead to a decrease in air quality on Exeter Street, and elsewhere in Salisbury, would be in breach of NPPF 124 which states that “Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.”</p> <p>Any updated transport assessment will need to be mindful of the traffic impacts of proposed developments across a wide area, including Salisbury and the A36 corridor, Wilton, Quidhampton and Lower Road (since traffic may attempt to avoid congestion hot spots on the A36) and also through the New Forest National Park. With bottlenecks likely at Harnham gyratory and on the New Bridge Road it is likely that traffic heading south, commuting perhaps to Bournemouth or Southampton, will take minor roads through the New Forest, with adverse consequences felt there.</p> <p>Without an updated and effective Salisbury Transport Strategy this development is not consistent with national policy and will need to be removed.</p> <p>One cannot prejudge what might be in a 'refreshed' Salisbury Transport Strategy, so any judgement as to whether this could make the development 'sound' would need to be made as and when this has been delivered and evaluated.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To review the effectiveness of any revised Salisbury transport strategy, which is not currently available.

Comment ID:	872	Consultee Mrs Margaret Roper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126319		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan to put 840 houses together with additional housing possible on the Harnham Business Park which has been recategorised to mixed development could inflict 900 houses in an area separated from the city of Salisbury by 5 rivers and the water meadows with only one crossing point, NewBridge Road. This will result in a population in the region of 10,000, three major through routes, and the district hospital traffic, all reliant on the Harnham gyratory and one bridge. This route is already at close to capacity and short of building completely new infrastructure it is difficult to see how this can be improved Changes to public transport are unlikely to produce any significant change. Already the 10minute service to the hospital is more an expression of hope over reality with the service regularly running 30 minutes late due to problems in the wider Salisbury area. Remove the plan to develop the sites in Harnham unless major new infrastructure is put in place.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	873	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge Community Area housing allocations			Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>You have failed at any time to consult with the Hilperton Neighbourhood Plan Steering Group. Your methodology is inadequate and you have failed in your 'Duty to Cooperate' as enshrined in the Localism Act 2011. The duty to cooperate requires additional consultation beyond existing statutory consultees. "The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process". (Paragraph: 009 Reference ID: 9-009-20140306. Revision date: 06 03 2014.)</p> <p>Fulfil your duty to cooperate per the 2011 Localism Act. Rectification of the points listed above.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to ensure that the opinion of the parish council can be properly heard by the Inspector.				

Comment ID:	874	Consultee Mr Chris Hutton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 893262		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.28		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My comments are based around the review of the settlement boundaries and consistency of application of policies laid out in the Settlement Boundary Review Methodology Topic Paper 1 June 2017. My specific interest is with the Yatton Keynell boundary review per page 114 of the Wiltshire</p> <p>Housing Proposal July 2017 and my property The Old Forge, The Street, Yatton Keynell. See separate attachment. I don't believe an oral examination is required as all the information is included in part 7. If however, it is required I am happy to take part.</p>				
Attached files (Please see Objective)	4711378				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	875	Consultee Ms S Birdseye Hallam Land Management/Velcourt Limited	Agent Mr David Barnes Star Planning & Development	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126328	Person ID: 326118	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.67		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Positively prepared The strategy of the plan will not meet objectively assessed development requirements of Salisbury in a manner which is consistent with achieving sustainable development;</p> <p>Justified The plan has not been prepared based upon the most appropriate strategy when considered against the reasonable alternatives and the available evidence.</p> <p>Effective The plan will fail to deliver the require housing to meet the needs of Salisbury over the plan period.</p> <p>Consistent with national policy Some aspects of the plan will not deliver sustainable development in accordance with the policies in the Framework. Paragraph 4.67 et seq Hallam Land Management (HLM) and Velcourt Limited object to any assumption that there will be a material contribution to the housing supply delivered at the Churchfields, Salisbury which is a strategic allocation for the city identified in the Wiltshire Core Strategy (Core Policy 20) (WCS). It is not HLM's or Velcourt's position that Churchfields should be deleted as an allocation because of its status in the WCS. However, reliance was placed on Churchfields as a strategic allocation to deliver a significant proportion of the housing and employment requirements of Salisbury during the period up-to 2026. If this strategic allocation fails to deliver then there is a need for the Wiltshire Housing Site Allocations Plan to satisfy the shortfall.</p> <p>The Allocations Plan recognises that it is unlikely that all the strategic sites allocated in the WCS for Salisbury would deliver sufficiently within the plan period to meet housing requirements and ensure supply. In part to address this matter a further strategic allocation at Netherhampton Road (Policy H3.1) is proposed and this is the subject of a separate objection from HLM and Velcourt.</p> <p>However, there is a complete lack of transparency in the submitted Allocations Plan and associated documents about what, as at July 2017, might be the likely number of dwellings which could be delivered by 2026 at Churchfields. This is important because the Allocations Plan acknowledges that the South Wiltshire Housing Market Area (HMA) has a slightly less generous housing land supply than elsewhere in Wiltshire. The WCS was adopted in January 2015. Within the WCS the expectation was that to expedite the delivery of development at Churchfields, the Council would work closely with the developers and landowners to facilitate delivery. It was envisaged that significant, tangible progress would be made towards a planning application being submitted within 18 months of the date of adoption of WCS. This has not happened.</p> <p>The WCS also identified a list of constraints which needed to be addressed to enable the development of Churchfields including:</p> <ul style="list-style-type: none"> Poor access through narrow rail bridges and via residential areas. Potential land contamination (including former land fill site, abattoir and steam engine shed). Protection and proximity of the River Avon Special Area of Conservation. 			

	<p>Salisbury city centre Air Quality Management Area. Protection of views of Salisbury Cathedral. Interdependencies with the Waste Site Specific Allocations DPD to find a suitable decant site for the Household Recycling Centre currently on site. Flooding (some fluvial and surface water flooding). Little obvious public progress has been made addressing these constraints. 6. Omitted from the list is land assembly which is complicated by the need to relocate the numerous businesses which currently operate at Churchfields. The Allocations Plan recognises that for Churchfields to be developed requires substantial employment uses to decant but this is now expected to commence later than envisaged in the WCS and much less land for new housing will be available before 2026. 7. A visit to Churchfields confirms that the area remains a busy industrial estate occupied with largely Class B2 and B8 uses and some B1 uses. There is a Household Recycling Centre in the south east corner of the estate and a Council depot. Decanting all these existing occupiers to new employment sites and premises does not appear to have started in earnest since the adoption of the WCS and even the Allocation Plan's comment about much less housing (albeit this is not defined) than envisaged being delivered by 2026 is open to considerable doubt. 8. The lack of progress in delivering housing at Churchfields is reinforced by the most recent Housing Land Supply Statement (April 2016) which suggested that 750 dwellings might be capable of being delivered between 2021 and 2026 (150 dwellings per annum). However, the same document confirms that there are legal constraints because the site is occupied; the site is assessed to be unavailable and there is no developer interest. The overall conclusion is that the site is not deliverable and this raises the question whether any reliance can be place don even 750 dwellings being delivered by 2026? HLM and Velcourt consider that no substantial delivery of new homes will be achieved at Churchfields by 2026. 9. Accordingly, it is correct for the Allocations Plan to seek to ensure that the housing requirement attributable to Salisbury and the wider Southern HMA is met through further residential allocations. It is, therefore, incumbent on this Allocations Plan to ensure that the housing need is met on suitable and appropriate sites at Salisbury as the principal settlement within the HMA whether within the confines of the city of on its periphery. Little, if any, regard should be had to the artificially defined Community Areas to allocate deliverable housing sites in sustainable locations.</p>
Attached files (Please see Objective)	4711333
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There is a need for the issues associated with the ability to deliver sites to be properly debated at the examination. Hallam Land Management is well placed with its extensive experience of delivering sites of all sizes to participate in such a debate.

Comment ID:	876	Consultee Ms S Birdseye Hallam Land Management/Velcourt Limited Person ID: 1126328	Agent Mr David Barnes Star Planning & Development Person ID: 326118	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Positively prepared The strategy of the plan will not meet objectively assessed development requirements of Salisbury in a manner which is consistent with achieving sustainable development; Justified The plan has not been prepared based upon the most appropriate strategy when considered against the reasonable alternatives and the available evidence. Effective The plan will fail to deliver the require housing to meet the needs of Salisbury over the plan period. Consistent with national policy Some aspects of the plan will not deliver sustainable development in accordance with the policies in the Framework. PolicyH3.1NetherhamptonRoad, Salisbury Hallam Land Management (HLM) and Velcourt Limited object to the inclusion of land at Netherhampton Road, Salisbury (640 dwellings) as a housing allocation because it is not the most appropriate strategy when considered against the reasonable alternatives and the available evidence base. HLM and Velcourt welcome the acknowledgement that it is unlikely all the strategic sites allocated in the Wiltshire Core Strategy (WCS) for Salisbury would deliver sufficiently by 2026 to meet housing requirements and ensure supply. This comment particularly applies to Churchfields (Core Policy 20) which will be unable to deliver 1,100 dwellings (if any) by 2026. It is a complex regeneration project that will take time to deliver, if at all, and will require other sites to become available to enable existing businesses to relocate. HLM and Velcourt have submitted a separate representation concerning the implications of the lack of housing delivery at Churchfields. It is incumbent on the Wiltshire Housing Site Allocations Plan to ensure that the housing need is met on suitable and appropriate sites at Salisbury as the principal settlement, within the Southern Housing Market Area whether within the confines of the city of on its periphery. Little, if any, regard should be had to the artificially defined Community Areas to allocate deliverable housing sites in sustainable locations. HLM and Velcourt recognise that the WCS does refer to the circumstances where further housing land might be required then sites at Netherhampton and additional growth at Longhedge should be considered as part of the ongoing monitoring process. However, HLM and Velcourt question the appropriateness of this Allocations Plan including a 'strategic' scale allocation of circa 640 dwellings at Netherhampton Road rather than, as might reasonably be expected, this scale of growth coming forward via a review of the WCS Core. The scale of housing development proposed has profound strategic impacts which have not been properly tested, including the need to revisit the Salisbury Transport Strategy. There is no other allocation in this Allocations Plan is of the same scale at Netherhampton Road and which would have the same degree of environmental and technical impacts.				

Instead of a strategy of hoping a single strategic site will meet the majority of the outstanding housing need, this Allocations Plan should limit the size of any site being no more than 200-250 dwellings. Accordingly, the Allocations Plan should be seeking to identify at least 4 other sites at Salisbury in preference to a strategic scale allocation Netherhampton Road with its significant and widespread implications for Salisbury. Given the experience at Churchfields, there must be doubts about the delivery of the strategic site at Netherhampton Road. This site does not feature in the most recent Housing Land Supply Statement (April 2016). The Allocations Plan does, at least, recognise that the scale of the site requires a generous lead in time for the delivery and it is not expected to contribute to housing delivery for several years. However, and there is a lack of transparency in the Allocations Plan about how many new homes are expected to be delivered on this site by 2026.

A recent study undertaken by Nathaniel Lichfield and Partners Start to Finish How Quickly do Large-Scale Housing Sites Deliver (2016) identifies that large sites of 500 dwellings takes 5-years to deliver new homes. Utilising July 2017 as a base date the Netherhampton Road site would not start delivering new homes until July 2022 at the earliest assuming the technical and environmental constraints can be overcome.

Development of this site is of such a large scale that, according to the Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A.6 Salisbury Principal Settlement (including Wilton Town) (2017) (SA), it is likely to increase traffic on local roads which may impact on local air quality, particularly at the Exeter Street and College roundabouts. The edge of city location will mean that there will inevitably be a dependency on use of the private car for trips which will increase emissions within the City Centre Air Quality Management Area (AQMA), especially at the identified junctions. No assessment has been undertaken to determine what the change in the air quality would be in the AQMA from the traffic generated by vehicles from circa 640 dwellings (plus the cumulative effect of a further 100 dwellings to the south of Netherhampton Road).

The Allocations Plan is also very clear that comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. This implies to HLM and Velcourt that the scale of traffic growth associated with this site would lead to severe impacts and, accordingly, the site should not be allocated for development unless or until there is a clear means of addressing this unacceptable harm, including on the A36 the management for which resides with Highways England. Such work would also need to consider the cumulative impact of about 100 dwellings proposed to the north of Netherhampton Road.

The suggested refresh of the Salisbury Transport Strategy should already have been undertaken to identify, in principle, any mitigation or improvement measures rather than rely upon a transport assessment which would be submitted with a planning application.

A further technical issue which ought to have been considered before the allocation was suggested is identified in the SA. The Habitat Regulations Assessment screening has identified that development at Salisbury could contribute towards impacts upon the River Avon Special Area of Conservation (SAC) through increased phosphate loading, and habitat loss/damage. In the case of the land at Netherhampton Road, the SA identifies that significant in-combination effects may make mitigation for phosphate impacts on the SAC challenging at this location. Again, where is the evidence that, in principle, this challenge can be met?

The theme about an inadequate evidence base is equally raised in the Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community Area (2017) (LA). The LA records that the Salisbury District Settlement Setting Assessment (2008) (SSA) describes the approach along Netherhampton Road as distinctive and memorable and that it should be conserved and enhanced. In understanding this comment, it needs to be kept in mind that about 100 dwellings are also proposed to be developed to the north of the road which would have an individual and cumulative effect on the setting and approach to Salisbury.

The LA goes on to say that there are views from the Public Rights of Way (PRoW) network which crosses this site with the Cathedral spire appearing above the undulating landform. The site is highly visible from Netherhampton Road and from the nearby PRoW network. There are middle distance views from a PRoW that crosses the Avon Valley. Views from the south eastern edge of Salisbury towards the site are, however, more limited by the landform at Harnham Hill and the warehouses at Harnham Business Park.

The site is large, open and exposed and visible from several publicly accessible routes, it forms the backdrop to a number of important views towards Salisbury Cathedral's spire and it is an integral part of an important western approach to the city. Development will interrupt these views and it would be difficult to mitigate against this impact and, therefore, as recorded in the LA the overall mitigation potential of development on this site would be low. Further, the LA confirms that development of the site would adversely affect the settlement setting and western approach into Salisbury and would have localised adverse effects on the adjacent River Avon landscape character area. There would be a major alteration to characteristics of the existing landscape and a high adverse magnitude of effect.

	<p>Due to the various concerns raised, the LA highlights that further detailed study should be undertaken to establish mitigation measures and the capacity of the site to accommodate change. This includes the preparation of a high-level conceptual masterplan with indicative areas of housing, open space and community infrastructure to help to establish development parameters and to enable a more accurate landscape and visual impact assessment. Although the policy requires built development to be kept below the 75-metre contour and for a country park to be located on the higher land to the south, a master plan has not been prepared as part of the evidence base to determine whether the identified adverse landscape and visual impacts raised can be effectively mitigated albeit the LA already acknowledges such prospects are low.</p> <p>The Allocations Plan recognises that the site includes prehistoric barrows, field systems and enclosures and has very high archaeological potential. The high risk of unknown archaeology on the site is recorded in the Salisbury Historic Assessment Report (2009) which also comments on the setting of the city by keeping built development off the higher slopes. Against this context, the SA is clear that further assessment of the high archaeological potential is required but this has not been undertaken to support the allocation, let alone the master planning suggested in the LA and Allocations Plan for this site. Despite the unknown location of any archaeological interests, the 'hope' in the Allocations Plan is that the scale of the site means any such interests could be retained in situ and an archaeological assessment supporting a planning application would address these matters.</p> <p>Leaving aside any master planning considerations, in the absence of further archaeological investigation of the type identified in the SA it cannot be said with any certainty that the site is deliverable and if so what its ultimate capacity might be.</p> <p>The site is located adjacent to the West Harnham Chalk Pit Site of Special Scientific Interest (SSSI) which is of geological interest. The Allocations Plan and the SA both recognise the need to protect the SSSI with a buffer created by the country park. However, the SA also highlights that informal recreational use of the chalk pit can be expected to significantly increase because of the development as the site is open and accessible. Apart from any possible risk to geological interests, there would be a significant health and safety risk for children using the site because of the sheer vertical drop which is accessible from the footpath. There must at least be question about the integrity of this geologically important SSSI from such an increase in use.</p> <p>The SA also notes that this site contains some best and most versatile agricultural land. Sequentially, either land of a lower quality should be developed in the first instance or land of a lower overall impact in relation to wider sustainability considerations.</p> <p>In addition to HLM and Velcourt questioning the appropriateness of this Allocations Plan identifying a strategic site of a scale more suited to the WCS, there is an obvious lack of transparency about assumed delivery rates and there is not a robust and cogent evidence base to support the development of around 640 dwellings at Netherhampton Road. There is no master plan to demonstrate that the site could be developed in a manner which would respect the known traffic, air quality, landscape, archaeological, heritage, setting and ecological constraints, including whether assessed individually or cumulatively with the 100 dwellings proposed north of Netherhampton Road.</p> <p>HLM and Velcourt note that the benefits relied upon to outweigh any identified harm, such as meeting the housing need or providing affordable housing, are applicable to every potential residential site at Salisbury and are not, therefore, unique to the proposed allocation.</p> <p>See attached representation</p>
<p>Attached files (Please see Objective)</p>	<p>4711340</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>There is a need for the issues associated with the ability to deliver sites to be properly debated at the examination. Hallam Land Management is well placed with its extensive experience of delivering sites of all sizes to participate in such a debate.</p>

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				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Positively prepared The strategy of the plan will not meet objectively assessed development requirements of Salisbury in a manner which is consistent with achieving sustainable development;</p> <p>Justified The plan has not been prepared based upon the most appropriate strategy when considered against the reasonable alternatives and the available evidence.</p> <p>Effective The plan will fail to deliver the require housing to meet the needs of Salisbury over the plan period.</p> <p>Consistent with national policy Some aspects of the plan will not deliver sustainable development in accordance with the policies in the Framework. PolicyH3.3 Land North of Netherhampton Road Hallam Land Management (HLM) and Velcourt Limited object to the inclusion of land to the north of Netherhampton Road, Salsibury (100 dwellings) as a housing allocation because it is not the most appropriate strategy when considered against the reasonable alternatives and the available evidence base. HLM and Velcourt welcome the acknowledgement that it is unlikely all the strategic sites allocated in the Wiltshire Core Strategy (WCS) for Salisbury would deliver sufficiently by 2026 to meet housing requirements and ensure supply. This comment particularly applies to Churchfields (Core Policy 20) which will be unable to deliver 1,100 dwellings (if any) by 2026. It is a complex regeneration project that will take time to deliver, if at all, and will require other sites to become available to enable existing businesses to relocate. HLM and Velcourt have submitted a separate representation concerning the implications of the lack of housing delivery at Churchfields. It is incumbent on the Wiltshire Housing Site Allocations Plan to ensure that the housing need is met on suitable and appropriate sites at Salisbury as the principal settlement, within the Southern Housing Market Area whether within the confines of the city of on its periphery. Little, if any, regard should be had to the artificially defined Community Areas to allocate deliverable housing sites in sustainable locations. The landscape merits of the land north of Netherhampton Road were originally assessed in 1998 by the Derek Lovejoy Partnership (DLP) on behalf of the former Salisbury District Council. The assessment concluded that this site would have an unacceptable landscape impact, principally by reason of its open character, views towards Salisbury Cathedral and views of the site from the rising land south of the River Nadder. The Allocations Plan recognises the land North of Netherhampton Road and the surrounding area is sensitive in terms of the setting to Salisbury Cathedral and views towards it. Further, the Salisbury District Settlement Setting Assessment (2008) (SSA) describes the approach along Netherhampton Road as distinctive and memorable and that views should be conserved and enhanced. Indeed, the importance of this approach to Salisbury was reiterated in the Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury</p>				

Community Area (2017) (LA). This LA does not mention the previous DLP assessment of the site and surprisingly suggests that the potential harm to the landscape interests and the approach to Salisbury could be mitigated by setting development back from the road. The Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A.6 Salisbury Principal Settlement (including Wilton Town) (2017) (SA) also raises concerns about landscape impact but, and in conflict with itself, then seeks to downplay the potential harm. The SA suggests development density would be fairly low because of the size of the site and also due to the fact that there would need to be a certain degree of landscape mitigation due to the site's fairly prominent location and views in/out of site (emphasis added). Such an assessment is consistent with the views of DLP and the SSA concerning the land north of Netherhampton Road. However, the SA also claims that any effects on the landscape are likely to be fairly well contained and linked to the existing site and surroundings (emphasis added). Overall, some minor adverse effects on the landscape are considered likely by the SA but there is potential for mitigation measures to reduce the extent of effects. Although there may well be scope for mitigation as suggested in the LA and SA, this does not get passed the site's fairly prominent location, views into/out of site, the unacceptable impacts DLP considered would arise from development and the importance of this approach to Salisbury as identified in the SSA. In reality, the evidence available does not support the proposition that the landscape and visual impacts of housing development on this site would be fairly well contained and nor would they be minor as suggested in the Community Area Topic Paper – Salisbury (2017) (CATP). Further, the assessment undertaken as part of the evidence base is thin in terms of the cumulative impacts of development both north and south of Netherhampton Road (Policy H3.1).

Three other matters arise from the evidence base. Firstly, the SA also notes that this site contains some best and most versatile agricultural land. Sequentially, either land of a lower quality should be developed in the first instance or land of a lower overall impact in relation to wider sustainability considerations.

Secondly, the future residents of the land north of Netherhampton Road would be heavily dependent on the proposed strategic scale allocation south of Netherhampton Road (Policy H3.1) to deliver social and community facilities (e.g. a primary school). If this strategic allocation were not found sound and progressed then the locational merits of the site would be adversely affected because it would have a higher degree of isolation from the other facilities within Salisbury. Indeed, the without additional primary school capacity the CATP acknowledges that the overall sustainability of the site is marginal.

Thirdly, in respect of the land south of Netherhampton Road the Allocations Plan is also very clear that comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. This implies to HLM and Velcourt that the scale of traffic growth associated with the strategic site would lead to severe impacts and, accordingly, the site should not be allocated for development unless or until there is a clear means of addressing this unacceptable harm, including on the A36 the management for which resides with Highways England. Such work would also need to take into account the cumulative impact of the circa 100 dwellings proposed to the north of Netherhampton Road.

The available evidence does not support the allocation of the land north of Netherhampton Road for housing purposes because the development of around 100 dwellings would have an adverse impact principally on the landscape and the setting of Salisbury. Further, the site's location is marginal in terms of sustainability.

Accordingly, and for the reasons given, this site should not be taken forward as an allocation for landscape and sustainable location reasons. Other sites of lower landscape impact exist on the edge of Salisbury and such sites would have the same benefits relied upon to outweigh the identified harm for this proposed allocation (e.g. such as meeting the housing need or providing affordable housing).

Attached files (Please see Objective)

4711348

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

There is a need for the issues associated with the ability to deliver sites to be properly debated at the examination. Hallam Land Management is well placed with its extensive experience of delivering sites of all sizes to participate in such a debate.

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The reason for keeping built development off the higher ground can usefully be found in the Downtown Road, Salisbury Development Brief (2005). One of the defining characteristics of Salisbury is its landscape setting with the city largely contained by landforms on all sides, namely by Salisbury Plain and the West Wiltshire Downs to the north and by the South Wessex Downs to the south. The vegetated and open skylines and ridgelines surrounding Salisbury are a distinctive part of the city's character and this setting of Salisbury is an important influencing factor on any development on the edge of the city.

The H2F allocation was located on rising ground with the highest ground to the south (i.e. what is now being proposed for housing at Rowbarrow) forming the skyline when viewed from several places within the city. These views include those out from the city towards surrounding countryside as well as views into and across the city, especially the view towards the Cathedral, focusing on the spire and Old Sarum. The more elevated areas to the south of the H2F allocation were also considered to form part of the landscape backdrop. Accordingly, the extent of built development for the H2F allocation was determined in the SDP to avoid siting buildings on the most prominent southern parts of the site thereby avoiding encroachment into the skyline in longer distance views.

The Brief is clear that built development being confined to the lower slopes rather than the elevated southern would avoid any significant impacts on the setting of Salisbury thus maintaining the landscape backdrop to the city and preserving the skyline. The same conclusion about the landscape and setting matters for the area within which the site sits was reached in the South Wiltshire Setting Assessment (2008) (SSA) where new development that disrupts key views to important landmarks and features within Salisbury and its setting should be resisted.

The Stage 4a Site Landscape Assessment Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community Area (2017) (LA) appears to ignore all the previous assessments (i.e. SDP, DLP, SSA and the Brief) about the determination of the extent of built development in this location and on the Rowbarrow site. This is despite the acknowledgement in the Allocations Plan that this is a sloping and quite prominent site.

What is now being proposed in the Allocations Plan is wholly contrary to the previous DLP assessment and the Brief and the SSA because housing would be erected on the higher ground above the 75 metre contour, it would mean the loss of an open area which is considered to be an important part of the backdrop of the city and is an area from which there are views towards the Cathedral, especially from the public right of way where the views would be lost because of around 100 dwellings in the foreground.

The Community Area Topic Paper – Salisbury (2017) (CATP) recognises the possible adverse impacts on the visual qualities of the wider countryside are a central concern but so are effects on heritage assets, especially the nationally designated heritage asset of the Woodbury Ancient Villages Scheduled Monument (SAM). The Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A.6 Salisbury Principal Settlement (including Wilton Town) (2017) (SA) specifically comments that there may be significant adverse impacts on the designated SAM from new housing development on this site (emphasis added). These adverse impacts are to the Iron Age settlement and the Palaeolithic site of international significance (emphasis added). Further, the site generally identified as having high archaeological potential.

The importance of the designated heritage asset is somewhat down played in the CATP which refers to the site being located adjacent to the SAM and that there may only be some moderate adverse impacts on its setting. The Allocations Plan is slightly more balanced requiring development to preserve the contribution made by the Rowbarrow site to the setting of the SAM and, if necessary, land would need to be set aside from development. The Allocations Plan goes on to say detailed design and layout will be guided by Heritage Impact Assessment and Scheduled Monument consent will be required.

However, this is a clear case where the Allocations Plan is 'hoping' that the impact on the designated heritage assets of international and national significance will be acceptable and that Schedule Monument consent will be granted. This hope is not supported or substantiated by the evidence. No proper heritage assessment has been undertaken as part of the Allocations Plan to confirm the degree of harm to the designated heritage assets and whether, at best, it would be less than substantial. The more important a heritage asset the greater the weight is given to its conservation and, reflecting the National Planning Policy Framework, causing substantial harm to a SAM should be wholly exceptional. Even if less than substantial harm is caused, there are other potential housing sites available at Salisbury where lesser or no harm would be caused to internationally and nationally significant heritage assets.

A further uncertainty around the suitability and deliverability of the site is the observation in the SA that if the site is comprised of calcareous grassland, this would be a constraint to development potentially requiring a significant offset. According to the SA a further ecological assessment of this site is required and this does not appear to have been undertaken. Alongside the lack of any proper heritage impact assessment, this yet another whole in the evidence base to support the allocation of Rowbarrow for housing development.

	<p>Accordingly, and for the reasons given, the Rowbarrow site should not be taken forward as an allocation for landscape, heritage and, potentially, ecological reasons. Other sites of lower landscape, ecological and heritage value exist on the edge of Salisbury.</p> <p>HLM and Velcourt note that the benefits relied upon to outweigh any identified harm, such as meeting the housing need or providing affordable housing, are applicable to every potential residential site at Salisbury and are not, therefore, unique to this proposed allocation.</p> <p>See representation</p>
Attached files (Please see Objective)	4711353
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>There is a need for the issues associated with the ability to deliver sites to be properly debated at the examination. Hallam Land Management is well placed with its extensive experience of delivering sites of all sizes to participate in such a debate.</p>

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5. Against this context it is also important to note that the Wiltshire Core Strategy (WCS) recognises:

'The administrative boundaries around the city have led to a large proportion of the development allocations in this Core Strategy being located outside of the boundary of the city. Some are, for example, located on new greenfield sites in the adjoining parishes which are within the Southern Wiltshire and Wilton Community Areas. These allocations are however considered to contribute towards the requirement for housing and employment for Salisbury and are included within this Salisbury Area Strategy.' (Core Strategy paragraph 5.109 – emphasis added)

Further,

'Due to the highly constrained nature of Salisbury, it is inevitable that a significant proportion of the growth required to meet its long-term needs will be located on greenfield sites on the edge of the city. Because the administrative boundaries are drawn tightly around the city, this will result in growth in several neighbouring parishes.' (Core Strategy paragraph 5.124 - emphasis added)

6. Accordingly, there is clear acknowledgement in the WCS that there is significant reliance on large strategic housing sites and that growth to meet the housing needs of Salisbury may well occur within neighbouring parishes, including Laverstock. Excluding sites on the edge of the built-up area of Salisbury from any assessment because they fall within the adjoining administrative parish should not have been applied to artificially preclude potentially more appropriate and suitable housing allocations when compared to those which are proposed in the Allocation Plan.

7. Ignoring the artificial application of the boundary, the HLM and Velcourt site at Church Road has been assessed against the Stage 2A criteria:

Table 1: Stage 2A Assessment for land at Church Road

Area SHLAA Site Ref	S204	
of		
Site Name	Land at Church Road, Laverstock	
Capacity	130	
Strategic	1	N
and Exclusionary	2	N
Criteria	3	N
	4	N
	5	N
	6	N
Remaining Developable Capacity	128	
Land Available (Y/N)?	Y	

Land Developable (Y/N)? Y

Consideration Site on the edge of the built-up area and is well related to existing facilities

Recommendation (take forward/remove) Take Forward

8. Based upon these criteria there are no reasons why the site should not have progressed to the Stage 3 assessment. The outcome of the Stage 2A assessment reflects the one undertaken for the site as part of the Strategic Housing Land Availability Assessment.

Table 2: Stage 3 Assessment for Land at Church Road

Area SHLAA Site Ref	S204
of Sear Site Name	Land at Church Road, Laverstock
ch: Site Capacity	130
Salis Site Capacity	130
bury SA Objectives	1 --
and	2 -
Witto	3 -
n	4 -
	5a -
	5b -
	6 0
	7 -
	8 +++
	9 ++
	10 +
	11 +

Is site proposed for Yes
Stage 4

9. A summary of the sustainability assessment for the site is:

Table 3: Stage 3 Sustainability Summary

Sustainability Appraisal- Summary of Assessment Site S204 - Land at Church Road, Laverstock

Site Overview

This site option is on the edge of the built-up area. The site has an area of 5.69 hectares. Allowing for some landscaping on the edge, the capacity would be around 130 dwellings

Assessment

No major adverse effects have been identified for this site.

One moderate adverse effect has been identified. The HRA screening assessment has identified that development at the settlement could contribute towards impacts upon the River Avon SAC through increased water abstraction, increased phosphate loading, and habitat loss/damage. Further assessment is required if for any sites at Salisbury if they are taken forward into any subsequent stage of the selection process (SA Obj. 1).

A range of minor adverse effects have been identified for this site. Development of the site will result in the inevitable loss of greenfield land (SA Obj. 2). Development would lead to a small increase in demand for water and there is a requirement for separate

foul and storm drainage disposal systems. Consideration should be given to the delivery of SuDS on site to control the risk of surface water flooding from impermeable surfaces. The site falls within the catchment of the Hampshire Avon and in a high risk catchment for phosphate loading and therefore further assessment would be required (SA Obj. 3). The site is not within a designated AQMA, but consideration would need to be given to the potential air quality impacts of construction and operation of the scheme. Such issues could relate inter alia to noise, dust and lighting. Whilst greenhouse gas emissions will inevitably be increased through development, this can be mitigated through incorporating into the design measures to reduce energy demand and increase energy efficiency, as well as promoting low carbon energy

sources and encouraging sustainable building practices (SA Obj. 5a). Whilst the site is located in Flood Zone 1 and development of the site is unlikely to lead to an increased risk of fluvial flooding from main river and/or ordinary watercourses, the development should incorporate SuDS to minimise vulnerability to climate change. A Flood Risk Assessment would be required (SA Obj. 5b).

A detailed Heritage Impact Assessment would need to be undertaken to support any future development at this site. The site has medium archaeological potential and archaeological assessment would be required albeit a desk-top assessment has determined any finds would be of local interest only (SA Obj. 6). The site has low intervisibility and effects on the landscape character would be well contained through the implementation of green buffers to any mature trees and hedgerows within and adjacent to the site (SA Obj. 7).

The development of this site for housing will generate minor additional vehicle movements on the local road network, especially through private car use (SA Obj. 10). However, the site is well paced for local services, including shops and schools, and is situated on an existing bus and cycle route.

Beneficial effects are identified for this site. Development on the site would help to meet local housing needs in accordance with the policies of the Core Strategy (SA Obj. 8). Due to the size of the site there is considered to be a positive effect against SA Obj. 9 as it is considered that local junior schools would have capacity to accommodate the number of pupil expected from this site; options for secondary education in Salisbury are being reviewed, though it is considered that all existing secondary schools (including academies) are capable of being expanded to cater for additional pupil numbers (SA Obj. 9). Development of the site will increase the local population and could have a minor contribution to the local economy through use of local shops and services (SA Obj. 11). Minor positive effects are also anticipated through the site generating direct and indirect construction employment, and helping to stimulate the local economy once built (SA Obj. 12).

Notwithstanding the moderate adverse effect shared by other sites at Salisbury and some minor adverse effects that would need to be addressed, this site is assessed as being more sustainable within this area of search.

10. Based upon these criteria there are no reasons why the site should not progress to the Stage 4 assessment. Indeed, the Stage 3 assessment is better than the land at Rowbarrow which is included in the Allocation Plan (Policy H3.4) despite 4 moderate adverse effects.

Table 4: Stage 4 Assessment

SHLAA	SiteName
--------------	-----------------

S204 Land at Church Road, Laverstock

[se4e map attached]

SHLAA SiteName

S204 Land at Church Road, Laverstock

Step1

SA effects and mitigation measures BIODIVERSITY

- The topography separates the site from Cockey Down which is a SSSI designated for its chalk down land characteristics, mainly plants, birds and butterflies. Based upon the ecological surveys which have been undertaken, the only known site specific issue is bats commuting along the hedgerows around the edge of the site which can be retained.

AIRQUALITYAND ENVIRONMENTAL POLLUTION

- There are commercial and residential premises in the vicinity but these are not particularly noisy uses. The site is not within or adjacent to the city's AQMAs. Construction impacts can be addressed by conditions.

HISTORIC ENVIRONMENT

- As with other sites it forms part of the setting of Salisbury and Wilton. It is not, however, within a key view on the approach to Salisbury, especially views towards the Cathedral spire. No obvious issues associated with cultural heritage of Salisbury. Sufficiently distant from key heritage locations including Salisbury Cathedral and Old Sarum so as not to substantially harm their settings.

LANDSCAPE

- Not a distinctive landscape. Land rises to the east towards Cockey Down. Built development would extend to about the 65 metres contour which reflects the housing development which has occurred in depth to the south of the site. Proposed housing would respect and reflect the residential and other developments which have occurred in depth along Church Road.

Accessibility Access from Church Road can be provided. Development is not of a scale which necessitates significant off-site highway works.

Adjacent to small scale employment site but ready access to Salisbury Town Centre and the employment areas at Churchfields and Southampton Road by cycle and bus.

Nearest shop within walking distance some 400 metres away. Access by bus within 15 minutes to the town centre.

Less than 5 minutes to walk Wyvern College, St Edmonds Girls School and St Joseph's Catholic School. St Andrews CofE School and Green Trees Primary School are also accessible on foot and cycle.

Overall Suitability Mitigation measures to reduce the likely minor adverse effects of developing this site are considered to be reasonable and achievable.

Considering the effects noted above and taking account of required mitigation measures, the site capacity would be capable of delivering approximately 130 dwellings.

Step2

Fit with area strategy This site would provide a proportion of the residual indicative requirement of 173 homes remaining to be met by 2026.

Development of this site would fit within the vision for the city. Salisbury is designated a Principal Settlement in the WCS. As such, it is a strategically important centre and primary focus for development in the South Wiltshire HMA.

Step3

Large villagesitefi N/A
twithCorePolicy1

	<p>Step4</p> <p>Summary</p> <p>The site is in an accessible and sustainable location capable of being served by existing highways infrastructure. The site is not of a size that will significantly add to pressures on local infrastructure, services and facilities. Access can be provided to this site from Church Road.</p> <p>All of the potential minor adverse effects associated with developing the site are considered to be capable of being addressed by straightforward mitigation measures. Given the relatively minor nature of effects, allied to the benefits in terms of the scale of residential development and scope for affordable housing, the site is assessed to be more sustainability benefits within the area of search.</p> <p>Conclusion</p> <p>11. Laverstock is physically and functionally part of the Salisbury/Wilton Principal Settlement notwithstanding its inclusion in the Southern Wiltshire Community Area. The WCS recognises that some of Salisbury's growth needs have to be accommodated within neighbouring parishes such as Laverstock.</p> <p>12. It is irrational to discount sustainable locations for growth on the edge of the built-up area of Salisbury because of the current inequitable application of a somewhat arbitrary boundary. The approach being adopted is leading to sites which have both greater impacts on the environment and less sustainability merits than the land at Church Road, Laverstock being brought forward for housing development. These sites are the subject of separate objections by HLM and Velcourt and should be deleted.</p> <p>13. HLM's and Velcourt's land interest at Church Road, Laverstock is situated adjacent to the built-up area of the Salisbury/Wilton Principal Settlement and should be taken forward as one of the replacements for the sites which have been identified in the Allocations Plan.</p> <p>See attached representation</p>
<p>Attached files (Please see Objective)</p>	<p>4711356</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>There is a need for the issues associated with the ability to deliver sites to be properly debated at the examination. Hallam Land Management is well placed with its extensive experience of delivering sites of all sizes to participate in such a debate</p>

Comment ID:	880	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.137		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is a conflict between the statement in paragraph 5.137 which indicates that there is scope for walking and cycling and the statement in the Sustainability Appraisal for this site which indicates at SA objective 2 point 1 that “as the site is on the edge of the settlement it is not considered to be within a reasonable walking/cycling distance to the city centre” (also in the summary of SA objective 2).</p> <p>One could certainly take issue with the views of the Sustainability Appraisal, the Wiltshire Council LTP3 Cycling Strategy considers that journeys up to 5 miles can be done by bicycle (see Cycle Strategy para 2.7 “There is great potential to increase cycling in Wiltshire, particularly through replacing short car journeys. This is most feasible for trips under 5 miles (30 minutes), although it can also form a part of longer journeys”. The uptake of electric bicycles of course extends this range, and means that hills form even less of a challenge.</p> <p>Any review of transport options for this site needs to be mindful of the fact that optimum cycling and walking routes to the City may well be via the traffic-free Town Path, an option which is not available to motorists and one which makes the distance considerably shorter for non-car user compared to the car. The Broken Bridges path also provides a pleasant traffic free route which might particularly suit those travelling from south of the river to employment sites in Churchfields.</p> <p>The Sustainability Appraisal needs to be reviewed and brought into line with WHSAP where necessary</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	881	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Policy H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Detailed comments in respect of the Netherhampton Road site also apply here, i.e. No Salisbury Transport Strategy or Green Infrastructure Strategy in place The site is outside the current/proposed settlement boundary It is unclear how governance works for a development which is in Netherhampton Parish and the South Western Area Board, how does this relate to Salisbury? Who is responsible for Neighbourhood Planning? In addition, the Flood Risk issues here need to be comprehensively addressed. Requires development of necessary documents (Salisbury Transport Strategy & Green Infrastructure Strategy) and also some indication as to how Wiltshire Council propose to link developments such as this to the settlement of Salisbury (if that is the intention).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To consider documents such as the Salisbury Transport Strategy which are not currently available				

Comment ID:	882	Consultee Ms Margaret Willmot	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 378123		Do you consider the draft WHSAP is sound?	No
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Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Some of the detailed comments in respect of Netherhampton Road also apply here, in particularly the lack of an effective Salisbury Transport Strategy or a Green Infrastructure Strategy.</p> <p>Requires development of necessary documents (e.g. Salisbury Transport Strategy & Green Infrastructure Strategy in order to demonstrate the acceptability of this development).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To consider documents such as the Salisbury Transport Strategy which are not currently available.				

Comment ID:	883	Consultee Mr David Penny	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126342		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The consultation has been drawn up without regard for the comprehensive and essential improvements which would be necessary to both local roads and the national road network. Salisbury is already a barrier to traffic flow - with this development it would be even worse.</p> <p>Instead of the Stonehenge tunnel, divert the A303 to the south and build a by-pass to the north of the city to connect the A36 to the diverted A303</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	884	Consultee Mr Philip Clark Person ID: 424159	Agent Mark Reynolds Person ID: 1124938	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.57		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. THE RELEVANT POLICY TO WHICH THIS REPRESENTATION RELATES</p> <p>1.1 This objection centres on the following parts of the document; 6. Settlement boundary review (and its supporting text) Table 6.2; Appendix A – Warminster Community Area, A.70 Sutton Veny proposals for revised settlement boundaries.</p> <p>Particular regard is focussed on Sutton Veny but the representation also questions the validity of the policy approach to the settlement boundary review as a whole, in terms of its wording and construct.</p> <p>1.2 This representation is structured to firstly consider the rationale underpinning the requirement for the settlement review before considering the housing supply position within the North West Housing Market Area (NW HMA) and the Warminster Community Area (WMCA). It goes on then to consider my Client's land in Sutton Veny and the case for its inclusion within the revised settlement boundary. An assessment of other development options within Sutton Veny is undertaken and thereafter the requested change to the WHSAP is outlined before concluding remarks are drawn.</p> <p>2 EVOLUTION OF THE REQUIREMENT FOR SETTLEMENT BOUNDARY REVIEW</p> <p>2.1 The Wiltshire Core Strategy, Inspector's Report December 2014 noted (at paragraph 36) that 'the Council has not reviewed the extent of the boundaries to inform the CS; instead relying upon the pre-existing development plan documents. Some of these were adopted several years ago, for example the Kennet Local Plan (2004), and it cannot be argued with great strength that the settlement boundaries contained therein are up to date for the purposes of the CS plan period'.</p> <p>2.2 The Inspector went on 'to review boundaries, the CS identifies community led planning as the vehicle to deliver the necessary updates. However, there remains a considerable risk that, for example, Neighbourhood Plans will not be delivered across the county in a comprehensive or timely fashion. Such an outcome would, in the context of the CS settlement and delivery strategy, potentially preclude development initiatives on the basis of an unjustified evidence base and therefore not represent a positive form of planning'.</p> <p>2.3 The Inspector suggested main modification 5 to the Core Strategy noting that 'there is scope to advance a timely review through a separate Development Plan Document'. At paragraph 41 the Inspector concluded that 'CP2 therefore relies heavily on the existence of settlement boundaries to manage growth. Whilst the principle of such an approach may be justified in terms of providing plan led clarity to what development may go where, the efficacy of the plan is partially undermined by the absence of particularly robust evidence in support of the</p>				

identified limits for each settlement...the effectiveness of CP2 in combination with CP1 is dependent upon a timely review of settlement limits as described in paragraph 37 above'.

2.4 Topic Paper 3: Settlement Strategy (one of the topic papers which form the evidence base for the Core Strategy) advises (on page 45) 'existing boundaries offer protection to the countryside and guard against urban sprawl ribbon development. However given that existing boundaries are out of date and do not reflect the current urban form there are development pressures along the boundaries'.

2.5 Paragraph 3.40 goes on to note that in settlements where 'existing boundaries are to be retained they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or Neighbourhood Plan it is expected that the review would then provide for development beyond the current settlement and the new boundary would again form the limit of development'.

2.6 The current position then is that the settlement boundaries are out of date. In the case of the settlement boundaries in the former West Wiltshire area these were drafted in the early 2000s prior to the west Wiltshire District Plan 1st Alteration being adopted in 2004. The settlement boundary of the large village of Sutton Veny has not been reviewed in at least 15 years and as the CS Inspector highlights the settlement boundaries should be considered to be out of date. This fact was also accepted by the Council in CS Topic Paper 3: Settlement Strategy (pg. 45).

2.7 Within Wiltshire progress on Neighbourhood Plans has also been limited. So far only 14 have been made and none have been made in 'large villages' which was one of the intended vehicles for further development to be brought forward. Sutton Veny Parish is not designated as a 'Neighbourhood Planning Area' so there is no prospect at present for the further development needs of the village to be met through Neighbourhood Planning.

In the event that the Council is unwilling to make the amendment sought through this representation it will be necessary to address the Inspector at the examination in public because the representation raises issues which question the soundness of the plan.

7 THE ABILITY OF OTHER SITES TO DELIVER THE NECESSARY DEVELOPMENT WITHIN SUTTON VENY

7.1 The revised settlement boundary is reproduced in full at the below (Fig 10). The revised settlement boundary has been assessed to understand whether it will provide any opportunities to support the settlement's housing need. The existing settlement boundary has also been considered because sites may come forward within the settlement. In terms of existing opportunities for residential intensification these are very limited which explains the poor level of delivery within the village over the first 11 years of the CS period.

7.2 The largest site within the settlement boundary is a garden and Paddock area at land adjacent Mulberry House. This land has not come forward since it was included within the village policy limit under the West Wiltshire District Plan 1st Alteration 2004 and there are several obvious difficulties which restrict the site from coming forward. The access point to the garden would have nil visibility to the east because of the outbuilding which is situated in the north of the plot abutting the road. The site is also located on a bend meaning that creation of an access for residential development would present a severe threat to highway safety. Any access would likewise directly abut the residential flank walls of Mulberry House and with windows facing the plot there would be significant harm to the amenities of the existing occupiers. I have been unable to identify any other additional sites within the housing boundary that have not yet been identified as coming forward for development.

7.3 Turning then to the revised boundary, it has been acknowledged by WC that the amendments have been made to regularise existing developments which sit outside of the settlement boundary rather than to identify new sites where windfall development may occur. An examination of the revised boundary very much confirms this as the approach. The only potential plot for development which I have been able to identify is a small parcel of land adjacent to No.5 Bests Lane which might accommodate one dwelling.

	<p>7.4 Other pieces of land of sufficient size to accommodate further residential development only include the grounds of the church of St John (on the High Street) or the grounds of The Manor House, Duck Street. However both of these are listed buildings and development within their grounds would result in substantial harm to the setting of these heritage assets and so would not be countenanced for development.</p> <p>7.5 The conclusion of this exercise is that only one new dwelling could potentially be brought forward within Sutton Veny as a result of the settlement boundary review in its current form.</p>
Attached files (Please see Objective)	4711448 / 4711447 / 4711446 / 4711445
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>3 HOUSING SUPPLY IN THE NORTH AND WEST HOUSING MARKET AREA</p> <p>3.1 The Council on the 17th August 2017 received the Inspector's decision in respect of an appeal against a refusal of residential development of up to 60 dwellings near Lyneham by Gleeson Developments Limited (Appendix 1). The Inspector in reaching his decision considered the latest position in terms of the Council's ability to demonstrate a 5 year land supply in the North and West Housing Market Area (NW HMA). The Inspector concluded in the period 2016-2021 the minimum target is 6,817 dwellings (which includes a 5% buffer) and that the Council's supply would be 6,891 as opposed to the 7,033 which was alleged by the Council. The agreed supply figure for housing only marginally therefore exceeds the required level of housing by a projected 74 dwellings over the next 5 years.</p> <p>3.2 This calculation presumes also that the Council will continue to be required to demonstrate only a 5% buffer above the 5 year housing target. The Inspector in this appeal concluded that a 5% buffer was appropriate despite an earlier Inspector ruling in a Malmesbury appeal that persistent under-delivery had taken place. The Inspector did however sound a cautionary note in concluding 'overall whilst I acknowledge performance is not strong in housing delivery and there are worrying signs that the Council need to address, particularly in the more recent years since adoption of the WCS where delivery has not met requirements, I do not conclude that under delivery at this point has been persistent in the context of the framework'.</p> <p>3.3 The Government White Paper 'fixing the broken housing market' published a consultation response to a proposed Housing Delivery Test. This proposes an assessment of delivery against the housing requirement in the past 3 monitoring years, beginning in November 2017. In cases where delivery over this time period falls behind then a 20% buffer may be required. This measure is likely to increase the risk of Wiltshire Council having to apply a 20% buffer which would immediately in the NW HMA result in a lack of a five year land supply.</p> <p>3.4 The review of the need for site allocations and of the settlement boundaries which underpin the WHSAP was predicated on a very different understanding of the housing trajectory coming forward over the 5 year period 2016-21. Hitherto the Council identified a supply of 7,446 dwellings against a target of 6,817 dwellings. The Inspector in the Lyneham appeal referred to above concluded that the supply was actually 6,891 dwellings against a target of 6,817.</p> <p>3.5 Delivery rates have failed to meet the Council's expectations and in the months since the publication of the Land Supply Statement (March 2017) 555 dwellings have fallen away from the projected deliverable 5 year land supply. The published WHSAP has clearly been superseded by events and the appeal conclusions clearly indicate there is a need to increase supply within the NW HMA to avoid the risk of a lack of 5 year</p>			

housing land supply occurring. The plan is un-sound in this regard because it is not positively prepared and it is not justified because it needs to be reviewed in terms of the material change in circumstances which the Lyneham appeal has yielded.

3.6 The WHSAP recognises the uncertainties inherent in housing delivery. Paragraph 2.3 of Topic Paper 4: Developing Plan Proposals advises that WC's strategy is 'to be sure of maintaining a five year housing land supply over each of the remaining years of the plan period, annual supply should exceed the five years and buffer required by planning policy. Any target level will be arbitrary but the Plan might look to provide at least six years of supply in each of the remaining years of the Plan period (to allow for any possibility of under-delivery in the future)'.

3.7 The 5 year housing land supply trajectory as published in the NW HMA purports to demonstrate that this is achievable in the HMA. This assessment is however based upon the now out of date projected deliverable supply. Whilst a delay in supply might bolster housing delivery at the end of the plan period, this becomes more uncertain when looking towards the end of the plan period.

3.8 Based upon the Inspector's conclusions on housing land supply in the Lyneham appeal it is clear that WC will be unable to demonstrate a 6 year supply over the forthcoming 5 years (2017-22). The WHSAP therefore needs to be fundamentally looked at in respect of the NW HMA in order to boost supply if it is going to achieve its own stated goal of at least a 6 year supply being projected in each of the remaining Core Strategy years to 2026. Given the required step change in delivery rates and the recent under-delivery of housing it is argued that a 6 year supply is an entirely reasonable and necessary target.

4 HOUSING SUPPLY IN WARMINSTER AND ITS ASSOCIATED COMMUNITY AREA

4.1 The position is significantly worsened when looking at the housing position for Warminster and its associated community area. Evidence base Topic Paper 3 to the WHSAP table 2.2 reproduced below evidences the position;
[refer to table in main report]

4.2 The Council's evidence shows a residual requirement of 494 dwellings. This represents nearly 25% of the required supply needing to be found through the WHSAP by a combination of settlement boundary review and site allocations. Against this challenging housing target it is important to also recognise that at present only 693 completions have taken place in the first 11 years of the plan period averaging 63 completions per annum leaving 1,367 completions required over the last 9 years of the plan period at a delivery rate of 151 dwellings per annum. This requires a real step change in housing delivery in the area and any delays in bringing the West of Warminster housing allocation for 900 forward to be delivering housing from 2018 will make the situation much worse. This lack of contingency and reliance on one large site puts the already inadequate levels of housing being projected at risk of slippage.

4.3 The WHSAP attempts to deal with the housing shortfall and proposes allocations within Warminster totalling 200 dwellings and a further allocation in Chapmanslade of 35 dwellings. Even if one presumes that these allocations are deliverable the strategy is not planning for enough housing to meet the objectively assessed need (OAN). The settlement boundary review has followed a process designed to regularise existing areas of development which sit outside the boundary rather than to seek to support additional windfall developments at the large village.

4.4 The WHSAP recognises as did the CS that area based targets for housing need not be overly prescriptive indeed they should not be recognised as maximum levels of appropriate development. There are some instances of settlements and community areas which WC consider will not be capable of delivering their required levels of development. Core Policy 31 of the CS (paragraph 5.158) outlines the specific issues related to the WMCA but at paragraph 2.6 of the WMCA Topic Paper it is noted that 'neither the WCS or the IDP identify insurmountable issues to the extent that they would restrict delivery of the level of housing proposed over the plan period'. There is then no reason articulated by WC to explain development not meeting the target outlined in the WMCA. Whilst there will be an element of windfall development within the WMCA this alone will be insufficient to meet the residual requirement of 259 dwellings.

4.5 As outlined above at 3.6 the stated approach of the Council is to seek to deliver a 6 year supply of housing for each of the remaining years of the plan period. In the case of the WMCA this level of housing has not been planned for. Indeed it seems highly unlikely given the existing shortfalls within the WMCA that the required levels of housing are achievable. The plan is not in this regard sound because it has not been positively prepared and is failing to meet the objectively assessed need without any strong environmental reason for not doing so.

5 THE APPROACH TO LARGE VILLAGES WITHIN THE WMCA WITH A PARTICULAR FOCUS ON SUTTON VENY

5.1 The below table has been extracted from the WMCA Topic Paper. It illustrates that housing completions within the large villages in the WMCA have not been very high at 61 and this is particularly the case in respect of Sutton Veny where only 2 completions have been reported in a 10 year period.

9 OVERALL CONCLUSIONS

9.1 The WHSAP has been drafted on the basis of an estimated supply of 7,446 dwellings over the 5 years 2016-2021 within the NWHMA (Wiltshire Housing Land Supply Statement - March 2017). Subsequent planning appeals including most recently the development of up to 60 dwellings near Lyneham by Gleeson Developments Limited has reduced the agreed deliverable supply over this period to 6,891 dwellings. In this context the plan needs to be reconsidered to provide additional housing.

9.2 The latest position on housing land supply is that there is very limited flexibility within the NWHMA with a currently agreed supply of only 74 dwellings over the minimum housing level required. This fails to meet the WHSAP requirement for a 6 year supply to be deliverable.

9.3 Within the WMCA the housing land supply is particularly constrained. Even taking into account the proposed allocations through the WHSAP this still leaves a residual requirement for 259 dwellings which have not been identified just to meet the minimum requirement for the WMCA. The forecast rates of housing delivery likewise require a step change in supply with only 693 delivered in the first 11 years of the plan period and 1,367 completions required in the remaining 8 years which is a significant risk to delivery.

9.4 Against this backdrop of unmet housing need the settlement boundaries of the large villages have been reviewed to regularise existing areas of the settlements but no expansions have been identified to meet the minimum level of housing need. Sutton Veny has only delivered 2 dwelling in the CS period so far and is failing to meet identified need.

In the event that the Council is unwilling to make the amendment sought through this representation it will be necessary to address the Inspector at the examination in public because the representation raises issues which question the soundness of the plan.

[refer to table in main report]

Table 1 – Housing delivery in the large villages

5.2 The existing settlement boundaries have limited development opportunities within the large villages and this is borne out in the limited level of supply outlined above. It is then all the more critical that the review of the settlement boundaries be used to boost supply. The settlement boundary review has though been undertaken with the rationale being that the review should seek to update and accurately reflect circumstances on the ground since they were first established. In practical terms this has resulted in the large villages settlement boundaries being expanded to include some areas of the villages which should hitherto have been incorporated but also potentially developable areas have been removed as the boundaries have been tightened up in other places.

5.3 The strategy for the WMCA is to make one allocation at Chapmanslade for 35 dwellings and stop growth in the other large villages, despite a shortfall in the WMCA and precarious housing land supply position more generally.

	<p>5.4 This approach to dealing with housing in the large villages fails the test of being consistent with national policy. The NPPG includes a section on rural housing and within this the Government make clear that 'rural housing is essential to ensure viable use of local facilities'. It goes on to note that 'all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence'. Sutton Veny is a larger village than Chapmanslade which is to receive an allocation of 35 dwellings and yet Sutton Veny is projected to deliver less than 10 dwellings.</p> <p>5.5 The evidence on housing need indicates a shortage of available housing and the CS Inspector clearly envisaged further growth outside of settlements. This is in line with the NPPF and NPPG which both seek thriving rural communities.</p> <p>5.6 In order to begin to rectify these problems the settlement boundaries need to be reconsidered to allow for small scale increases through windfall developments allied to the larger site allocations process. At present WC's projected delivery is 143 dwellings in the remainder of WMCA (outside of Warminster) over the plan period this does not cater for the 6 years supply which is the stated objective of the plan, it likewise will not assist with meeting the housing shortfall in Warminster. The community area serving Warminster is the most logical area to search for further housing sites to meet this need and through settlement boundary reviews but the WHSAP fails to achieve this and is not therefore positively prepared.</p> <p>5.7 The most recent evidence regarding housing need within Sutton Veny can be found in the November 2014 Sutton Veny Parish Housing Needs Survey. The survey was focussed on affordable housing need but it did also highlight the need for market housing. There were 111 respondents to the survey (32.5% of the village) and the key findings of the report were that 72% of respondents were in favour of some new housing in Sutton Veny. The most commonly chosen option was for between 4-10 dwellings. In July 2014 there were 12 households on the WC Housing Register seeking affordable accommodation in Sutton Veny. Likewise those who were able to meet their own housing need on the open market also described a lack of suitable accommodation in Sutton Veny.</p>
Attached files (Please see Objective)	4711448 / 4711447 / 4711446 / 4711445
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>6 MY CLIENT'S LAND IN SUTTON VENY AND THE CASE FOR ITS INCLUSION WITHIN THE SETTLEMENT BOUNDARY OF THE VILLAGE</p> <p>6.1 My Client's residential curtilage is shown in the below (Fig 1) and as a scaled drawing in (Appendix 2). The Council's suggested amended settlement boundary is reproduced at (Fig 2).</p> <p>6.2 The revised settlement boundaries underpinning the WHSAP should reflect WC's methodology for reviewing the boundaries which is outlined in WHSAP Topic Paper 1. The boundary review methodology was put out for 'informal consultation' to the Parishes and the consultation feedback has been summarised at paragraph 6.5 of that document. One of the key conclusions was that respondents 'disagreed that the settlement boundary should exclude large gardens and particularly objected to the line being drawn through the middle of the curtilage of properties'. It was also 'argued that there was less opportunity to meet NPPF and Wiltshire Core Strategy housing targets on land within the settlement boundary because the proposed changes removed land with only minor additions. This resulted in tightly constrained settlements, excluding large gardens'. [refer to map extracts in main report] Fig 1 – Residential curtilage of No.44 High Street, Sutton Veny (comprising the land within both the red and blue line) Fig 2 – Extract from indicative revised settlement boundary High Street, Sutton Veny</p> <p>6.3 As a result of the 'informal consultation' exercise WC note at 7.20 of the Topic Paper that 'the revised settlement boundary review methodology will include the curtilage of a property that relates more closely to the built environment, e.g. a garden), or has limited capacity to extend the built form of the settlement in terms of scale and location'. The revised settlement boundary review methodology is thereafter produced at 8.2 of the Topic Paper and reproduced at (Fig 3) here for convenience. [refer to table in main report] Fig 3 – Settlement boundary review methodology</p> <p>6.4 The qualifying criteria are clear that areas of garden should be included because these are uses which relate more closely to the built environment. The policy specifically allows for this and also allows for developments which have limited capacity to extend the built form of the settlement. The policy does not require a site to comply with both of these criteria because the policy wording uses the word or rather than and.</p> <p>6.5 The policy guards against large parcels of land coming forward by deliberately excluding areas which are more closely related to the open countryside (e.g. a field or paddock) from being included within the settlement boundary. It is important to highlight that there was a change between the draft methodology and the revised methodology regarding the definition of sites which should be excluded from the settlement boundaries. At the draft methodology stage the plan sought to exclude 'the curtilage of properties that have the capacity to extend the built form of the development. This includes large gardens'.</p>			

6.6 The revised methodology removed any reference to garden land being excluded which was in response to the 'informal consultation' exercise. It now excludes those uses which relate more closely to the open countryside e.g. fields or paddocks. There can in this context be no question that the revised methodology seeks to exclude areas of garden from the settlement boundary. As has been reported, WC also accept that the splitting of curtilages with the settlement boundary should not occur in any case following strong consultee input to this effect.

6.7 The settlement boundary as presently consulted upon does not though include the full extent of my Client's domestic garden, at present the suggested position of the boundary splits the curtilage. WC acknowledge that the positioning of the boundary is a desk top exercise and this would appear to be in part the reason for the misunderstanding in this case.

6.8 The land we are seeking allocation of was granted a certificate of lawfulness for existing use as residential garden in 2004 (Appendix 3). The application (04/01153/EUD) was described as 'change of use from pasture land to residential garden'. The site to which the certificate of lawfulness applies was granted is the same as the extent of the site shown in (Fig 1). The Council accepted in granting the certificate that the land had been part of the garden of No.44 since 1990. The Case Officer's site inspection notes records that the land is 'obvious garden – lawn, ornamental trees, shed, veg patch'. The certificate was granted after the existing settlement boundary was drafted and so was not reflected as being within the settlement boundary at that point albeit it had already been in residential use for over 10 years at that point.

6.9 Fig 4 shows an aerial photograph of the site which clearly shows outbuildings, along with vegetable patches on the site and the well mown and manicured surface. This contrasts with the agricultural field to the west of the site. There is a hedgerow running down the length of the plot along the southern boundary which is set on a raised embankment which can be seen on the aerial photograph and Figs 5 and 9. Figs 5-9 are recent photos of the plot which confirm that the site is still in use as part of the garden of No.44.

[refer to photographs in main report]

Fig 4 – Extract from BING maps (aerial view)

Fig 5 – Entrance into the garden from the High Street

Fig 6 – View of the front of the garden area and hedged boundary

Fig 7 – Domestic shed and composting spaces on the garden

Fig 8 – View looking west up the garden

Fig 9 – Embankment and hedge above marking the southern boundary of the garden

6.10 The land has been recognised formally as being within the garden of No.44 already by WC. The garden has been used for a variety of purposes includes domestic vegetable growing and as an amenity space for sitting out in, playing games and as a location for a paddling pool. The examples of land that should be excluded from the settlement boundary include uses which do not relate to the built up area of the village such as paddocks and fields. A paddock is defined in the Oxford English Dictionary as 'a small field or enclosure where horses are kept or exercised'. The use as a domestic garden cannot be said to fall within the excluded category of uses outlined in Fig 3.

6.11 The area of garden which we now seek inclusion within the settlement boundary should be included when adopting the 'revised methodology' which underpins the WHSAP because the guidance is explicit that the curtilage of property that relate more closely to the built environment (e.g. a garden) will be included.

6.11 The policy test does not require garden land to have limited potential to extend the built form of the settlement rather this test is applicable for land which relates more to the open countryside and in those cases a proposal would need to have the capacity to substantially extend the built form. In the case of my Client's land it would not extend the built form of the settlement. The land is in residential use already and there is a strong boundary to the south east which would prevent development sprawling outside of the land already in residential use.

6.12 WC have accepted in producing this revised methodology that the settlement of Sutton Veny was not properly enclosed within the existing settlement boundary. This has resulted in the draft suggested settlement boundary being expanded significantly in a south easterly direction. My

Client's land is located in the heart of the village. More centrally than the village school and church which have been included within the settlement boundary. Likewise, the further ribbon development along the High Street to the south east and the cul de sac of Springhead and the residential development along Duck Street have been included which are more peripheral.

6.13 The land put forward here is located on the High Street within the centre of the village with key facilities like the school and church directly adjacent and the Woolpack public house in close proximity. The proposed widened inclusion of land would not extend the form of the village which clearly extends further to the south east which has been recognised in that the settlement boundary has been extended significantly. The site is well screened with the embankment and hedgerow to the south and the wall and hedge at the frontage. The adjoining land to the south east is a field so there is no risk therefore that development might leap frog if the settlement boundary is widened.

6.14 It is important to have regard to the purpose of the settlement boundary review in considering whether my Client's land should be included in full. The CS Inspector noted that where 'existing boundaries are to be retained they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or Neighbourhood Plan it is expected that the review would then provide for development beyond the current settlement and the new boundary would again form the limit of development'. Indeed, the CS was only found sound on the basis that the settlement boundary review would be positively prepared. By including my Client's land this would allow for a small development to come forward to assist in meeting local housing need in Sutton Veny which to date has only delivered 2 dwellings during the CS period from 2006.

9.5 Under the auspices of the revised settlement boundary review methodology my Client's land as outlined in (Fig 1) and (Appendix 2) should be included in its entirety. The land is part of the residential garden of No.44 High Street, as formally determined when the Council granted a certificate of lawfulness in 2004 recognising the land in question as part of the garden. As garden land it must be understood to be land which relates more closely to the built environment of Sutton Veny.

9.6 The revised methodology is clear that gardens should be included within the settlement boundary with the earlier iteration of the methodology, which sought to exclude large gardens, being removed from the revised methodology. Furthermore, the revised methodology for settlement boundary review specifically excludes the prospect of subdividing gardens with the settlement boundary which was strongly opposed during the informal consultation on the emerging methodology.

9.7 Whilst not a policy requirement for garden land in large villages under the revised methodology it is clear that the inclusion of my Client's land will not extend the settlement. The site likewise has a strong boundary comprising an embankment and hedgerow boundary to the south running the length of the site and this is the appropriate 'physical feature on the ground' to mark the edge of this land with the adjacent field.

9.8 The existing methodology for settlement boundary review should therefore have included my Client's land and an amendment is sought to regularise this discrepancy. The housing shortage and lack of available supply to meet demand in Sutton Veny lend further significant weight to the land being included prior to examination of the WHSAP.

8 AMENDMENTS SOUGHT TO THE WHSAP

8.1 The revised settlement boundary for Sutton Veny should be expanded to include my Client's garden in full which is depicted at (Fig 1) and (Appendix 2). This will regularise the discrepancy between my Client's site not being included and the adopted methodology for determining the position of the settlement boundary which specifically advises that gardens will be included within settlement boundaries and domestic curtilages will not be bisected by the boundary. It will be able to contribute a dwelling towards meeting the, as yet unmet, housing need in the WMCA and go towards achieving the 6 year housing land supply which the plan should be designed to deliver.

In the event that the Council is unwilling to make the amendment sought through this representation it will be necessary to address the Inspector at the examination in public because the representation raises issues which question the soundness of the plan.

Attached files (Please see Objective)	4711448 / 4711447 / 4711446 / 4711445
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	887	Consultee Mrs Eileen Day	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126383		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Too many houses in an area that already suffers traffic congestion. This will cause further pollution affecting local residents and children from the Infant & Primary School. Extra traffic congestion will impact on the safety of children attending the school. No local GP Surgeries or large supermarket, making residents having to travel across town for these services. Residents will need to use their cars for travel to work as not many local job opportunities within walking distance. Bus services unpredictable due to traffic congestion. The extra traffic will impact local residents, the lovely views of the Cathedral as you enter Salisbury and just make it another built up area. The fields near Netherhampton Road can flood, with extra housing this will create an extra burden or may move the flooding problem to another area within Harnham.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	888	Consultee Rev. Jacqui Clark	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1054271		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Community Area housing allocations		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>You are proposing allocating greenfield land in the Hilperton Gap for housing (sites 263 and 297). However, the sites have a combined area of circa 20 hectares and yet you are proposing that, after mitigation measures, the site(s) could take 205 dwellings. An housing density of only 10 dwellings per hectare is roughly one third of typical modern housing and is clearly a waste of such a precious area of greenfield land.</p> <p>This area was commented on in the West Wiltshire District Plan First Alteration by the Planning Inspector who stated inter alia that the area should not be developed (paragraphs 2.2.47 to 2.2.49).</p> <p>You have failed to comply with your own Core Strategy which states (section 5.150 bullet point #6) that open countryside should be maintained to protect the character and identity of Hilperton from Trowbridge. Leaving only the eastern side of the Gap undeveloped will not achieve this. Remove sites 263 and 297 from the allocation process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	889	Consultee Mr Bryan White	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126410	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	We the undersigned wish to object to this Planning Application and fully endorse the recent representations as submitted by the Councillors and Committee of Bratton Parish Council. This would be ribbon development outside the periphery and boundaries of Bratton! Furthermore both the local infrastructure; schools; medical facilities and traffic using the A3098 between West Lavington and Westbury is already overloaded!! Vehicular access from Westbury Road to any residential properties built at this location would be extremely dangerous!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	890	Consultee Rev. Jacqui Clark	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1054271	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H 2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>You are proposing allocating greenfield land in the Hilperton Gap for housing (sites 263 and 297). However, the sites have a combined area of circa 20 hectares and yet you are proposing that, after mitigation measures, the site(s) could take 205 dwellings. An housing density of only 10 dwellings per hectare is roughly one third of typical modern housing and is clearly a waste of such a precious area of greenfield land.</p> <p>This area was commented on in the West Wiltshire District Plan First Alteration by the Planning Inspector who stated inter alia that the area should not be developed (paragraphs 2.2.47 to 2.2.49).</p> <p>You have failed to comply with your own Core Strategy which states (section 5.150 bullet point #6) that open countryside should be maintained to protect the character and identity of Hilperton from Trowbridge. Leaving only the eastern side of the Gap undeveloped will not achieve this. Delete the proposed housing allocation for sites 263 and 297.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	891	Consultee Dr Heather Churchill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126419		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The road from the proposed site has no continuous paving down to the A429 and there is no space on Tetbury Lane to put this in place. Tetbury Lane is a busy road used by farming vehicles and heavy lorries to Tetbury and the industrial businesses further up the road, rather than travelling via Malmesbury. The road to Tetbury already needs work to repair large dangerous potholes for vehicles and cyclists and could not cope with the undoubted increase levels of traffic with the new development. As such the new residents in these houses would increase the risk by 20% of a pedestrian accident, particularly with children and vulnerable older residents. There are no village businesses recruiting so new residents in this housing will need to travel outside of the village on a regular basis for work and schools. The public transport from Crudwell is not regular enough to fit with working hours and so will require increased vehicle traffic which as already explained is not suitable at this site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	892	Consultee Dr Heather Churchill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126419		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I live at the bottom of Tetbury Lane and can assure the planners that every time there is any moderate rainfall the bottom of the lane becomes a stream. By building on already stretched drainage capacity land further up the hill this will significantly increase the flood risk for existing residences. Additional drainage facilities on site cannot proportionately account for the loss of drainage land at the Ridgeway Farm site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	893	Consultee Dr Heather Churchill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126419	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed plan for development of the site would represent a 20% increase in the number of houses in Crudwell. This increase is completely out of proportion to the facilities available in the village. The village school for example is already running at stretched capacity and cannot facilitate an incremental increase on this scale without needing a major reconstruction of the existing highly respected school.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	894	Consultee Dr Heather Churchill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126419		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In view of the proposed Ridgeway Farm plan for 40 additional houses in Crudwell I would like to raise serious objections on a number of grounds as a resident of the village.</p> <p>Most importantly there is no strategic need for a supply of housing in this area. There is already anticipated to have an oversupply of 100 houses in the Malmesbury Community Area so the building of additional housing in an outlying village is irresponsible and poorly thought through. The Crudwell Village Plan in progress will allow the villagers of Crudwell with experience of the area, amenities and site to plan the areas of development in a considered, sustainable way. The Plan will encourage development in a proportionate manner and protect the existing village whilst welcoming future villagers in a safe and sensible way.</p> <p>I am a young person looking to purchase affordable housing in the local area and I can say with great conviction that for the reasons above, housing at a site such as this is not suitable for people looking for affordable housing such as that specified as a strategic need in Wiltshire. All of the above points show why this Ridgeway Development Plan is not in keeping with consideration of the needs of the proposed new residents, the existing residents of Crudwell nor the wider needs of Wiltshire in the future. As such I strongly object to this development and would encourage the council to consider further developments in the Crudwell area in line with the Crudwell Village Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	895	Consultee mr chris kelly	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126214		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sutton Benger			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have lived in Sutton Benger since 1992 and have seen many changes to the village and the surrounding area over that time. Many improvements have been made and I understand that inevitably expansion and increased housing are required. I feel the village has expanded if anything too quickly in recent years and is now such a size that we need a period of consolidation to enable the support services to catch up. I feel Sutton Benger has done its fair share of expansion up until now.</p> <p>Roads, traffic management, broadband internet, parking and the primary school are all working at full capacity.</p> <p>The main point I wish to emphasise is regarding the Primary School. It is in a central position within the village such that any further expansion would have a detrimental effect. The only further space available would be for the school to re-build two storey buildings and expand somewhat onto our recreation ground. That would have a massive detrimental effect on the life and vibe of the village, as well as going against the wishes of the benefactor who gifted the Rec to the village.</p> <p>Already local residents are losing the battle against school parking traffic, and it is a matter of time before a child is injured due to the amount of traffic and the speed of driving in the 20mph zone around the school and in Chestnut Road. The school itself is in an awkward position; as a business it wants to expand but at the same time has to be seen to be doing something in case there is an accident during pick up and drop off of the kids. The publication of cardboard signs warning about parking has limited effect. The reason for the current problem is that the school was allowed to expand and build on (or use for other purposes) the staff parking area within the fenced boundary. Now we are in a situation where we have on average 14 or more visitors / staff cars parked on the residential street all day (8am-5pm). This prevents the parents finding a safe drop off area when taking the children to school. This in turn leads to parents parking inappropriately or taking risks or parking further away in local streets. If you add in the school bus having to navigate down Chestnut Road it is all very hazardous at times. The congestion is considerable at peak times; actually the problem is that the school being the size it is, is actually in the wrong place.</p> <p>If and when new housing is forced upon us here in Sutton Benger, the school should be relocated as part of the plan. It should be something the developers are required to include in the plan. It would make sense to integrate this essential asset into any further expansion plans. These plans should include a dedicated staff car park and an area designed for the safe pickup and drop off of the children. This joined-up thinking would actually provide an asset to the village and many residents would then maybe support the expansion and building of some extra housing.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	896	Consultee Mr David Penny	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126342		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The consultation has been drawn up without regard for the comprehensive and essential improvements which would be necessary to both local roads and the national road network. Salisbury is already a barrier to traffic flow - with this development it would be even worse. Instead of the Stonehenge tunnel, divert the A303 to the south and build a by-pass to the north of the city to connect the A36 to the diverted A303				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	897	Consultee Mr David Penny	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126342		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Netherhampton Road fields chosen for the development are subject to flooding, and replacing open fields with unabsorbent buildings and concrete etc. would increase the risk of flooding, also any effect on the water table could affect the foundations of Salisbury Cathedral</p> <p>Instead of the Stonehenge tunnel, divert the A303 to the south and build a by-pass to the north of the city to connect the A36 to the diverted A303</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	898	Consultee Mr David Penny	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126342		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Netherhampton Road fields chosen for the development are subject to flooding, and replacing open fields with unabsorbent buildings and concrete etc. would increase the risk of flooding, also any effect on the water table could affect the foundations of Salisbury Cathedral</p> <p>Instead of the Stonehenge tunnel, divert the A303 to the south and build a by-pass to the north of the city to connect the A36 to the diverted A303</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	899	Consultee Nicola Bridgeman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126445	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Sites Allocation Plan - I am writing to raise my concerns in relation to the above public consultation event. I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village. I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons:</p> <p>Issue: No evidence of housing need for Yatton Keynell Details: Appendix E of the Chippenham Community Area topic paper) confirms that no local housing needs survey was undertaken as part of the plan. The proposed dwellings should be justified with evidence that there is a specific local need. Relevant National Policy in conflict with: paragraph 158 of the NPPF which states: 'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic , social and environmental characteristics and prospects of the area. Strategies for housing and other uses are integrated and they take into account relevant market and economic signals'.</p> <p>Issue: Lack of a Neighbourhood Plan Details: At a Parish Council meeting back in November 2014 there was a call for a Neighbourhood Plan to be made so that residents can engage in how many and where future housing might take place. Relevant National Policy in conflict with: Para 155 of NPPF</p> <p>Issue: Site selection process unsound Details:</p>				

	Sutton Benger has an identified need and no housing has been allocated. Yatton Keynell has no identified need yet 30 houses are proposed Relevant National Policy in conflict with: Para 159 of the NPPF
Attached files (Please see Objective)	4711546
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	900	Consultee Nicola Bridgeman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126445		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issue: Infrastructure issues</p> <p>Details: Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area.</p>				
Attached files (Please see Objective)	4711546				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	901	Consultee Nicola Bridgeman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126445		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issue: Poor consultation</p> <p>Details: None of the Parish Council's from the five villages in the Chippenham Community Area responded to Wiltshire Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement.</p> <p>Relevant National Policy in conflict with: Para 155 of NPPF</p>				
Attached files (Please see Objective)	4711546				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	902	Consultee Nicola Bridgeman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126445	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issue: Proposal will have significant impact on the character of the area</p> <p>Details: A large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area. In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)	4711546				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	903	Consultee Mr Andrew Martin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126224		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I do not have the detailed legal knowledge to be able to say that this plan is legal. I have therefore declined to check the legal box. However likewise I am not able to say that is not legal. There should be the option to check a 'don't know' box.</p> <p>p5.117 The proposal already notes that it is "within a Special Landscape Area. A part of the site also adjoins the Bratton Conservation Area." The proposal will most definitely impact on the landscape as viewed from the historic site of Bratton Camp and adjacent high ground. It will also damage the nature of the conservation area, notably by the increased traffic through it.</p> <p>The only way this plan could potentially be made sound is by halving the number of dwellings and making provision for green space, a childrens' play area, woodland, screening and by having dual access roads.</p> <ol style="list-style-type: none"> 1. The inclusion of this many dwellings and at such a density in this location will have a really damaging impact on the special landscape value of the area and the conservation of Bratton's heritage and history. 2. The proposed development is completely out of place in the location proposed and more appropriate to a town centre setting. 3. The local planning authority has already twice rejected development plans for the site in question and considered that "the edge of the existing village is well defined and that the housing development proposed, together with the access road thereto across the field in front, would be a substantial intrusion into the rural landscape, and would therefore be detrimental to the character and scenic quality of the area." Nothing else has changed in the area so these decisions should still stand. 4) If the plan should be adopted (in any form) then measures MUST be put in place to restrict HGV and construction traffic from using Court Lane, and attempting the dangerous junction onto the B3098 at Tollgate House. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	904	Consultee Mr Andrew Martin Person ID: 1126224	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I do not have the detailed legal knowledge to be able to say that this plan is legal. I have therefore declined to check the legal box. However likewise I am not able to say that is not legal. There should be the option to check a 'don't know' box.</p> <p>p5.119 The space for the proposed woodland planting has not been identified, and clearly cannot be accommodated within the area identified. A single row of trees would not constitute 'woodland' and will take years to provide any significant screening, especially from the B3098 and area of natural landscape towards Bratton camp.</p> <p>The only way this plan could potentially be made sound is by halving the number of dwellings and making provision for green space, a childrens' play area, woodland, screening and by having dual access roads.</p> <ol style="list-style-type: none"> 1. The inclusion of this many dwellings and at such a density in this location will have a really damaging impact on the special landscape value of the area and the conservation of Bratton's heritage and history. 2. The proposed development is completely out of place in the location proposed and more appropriate to a town centre setting. 3. The local planning authority has already twice rejected development plans for the site in question and considered that "the edge of the existing village is well defined and that the housing development proposed, together with the access road thereto across the field in front, would be a substantial intrusion into the rural landscape, and would therefore be detrimental to the character and scenic quality of the area." Nothing else has changed in the area so these decisions should still stand. 4) If the plan should be adopted (in any form) then measures MUST be put in place to restrict HGV and construction traffic from using Court Lane, and attempting the dangerous junction onto the B3098 at Tollgate House. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	905	Consultee Mr Andrew Martin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126224		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I do not have the detailed legal knowledge to be able to say that this plan is legal. I have therefore declined to check the legal box. However likewise I am not able to say that is not legal. There should be the option to check a 'don't know' box.</p> <p>p5.120. Floodwater run off is a particular issue in the area and only last week the whole width of Trowbridge road at the junction of Lower Road and Court Lane was submerged with a torrent of floodwater during a storm. Paving over and building upon such a large area of adjacent higher ground that sits on a spring line will inevitably result in more serious flooding possibly affecting properties in Court Lane, Lower Westbury Road, and Trowbridge road.</p> <p>The only way this plan could potentially be made sound is by halving the number of dwellings and making provision for green space, a childrens' play area, woodland, screening and by having dual access roads.</p> <ol style="list-style-type: none"> 1. The inclusion of this many dwellings and at such a density in this location will have a really damaging impact on the special landscape value of the area and the conservation of Bratton's heritage and history. 2. The proposed development is completely out of place in the location proposed and more appropriate to a town centre setting. 3. The local planning authority has already twice rejected development plans for the site in question and considered that "the edge of the existing village is well defined and that the housing development proposed, together with the access road thereto across the field in front, would be a substantial intrusion into the rural landscape, and would therefore be detrimental to the character and scenic quality of the area." Nothing else has changed in the area so these decisions should still stand. 4) If the plan should be adopted (in any form) then measures MUST be put in place to restrict HGV and construction traffic from using Court Lane, and attempting the dangerous junction onto the B3098 at Tollgate House. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	906	Consultee Mr Andrew Martin	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126224		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure 5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I do not have the detailed legal knowledge to be able to say that this plan is legal. I have therefore declined to check the legal box. However likewise I am not able to say that is not legal. There should be the option to check a 'don't know' box.</p> <p>p5.121 Even if the main access is to the B3098, there is no practical way of managing the impact of the additional traffic on properties in Court Lane and Trowbridge road. Court Lane in particular is winding, steep and narrow and lacks footways. There are already incidents where vehicles are damaged by passing traffic. Horseriders, pedestrians and cyclists are put at significant risk by vehicles travelling at excessive speed. Oversized vehicles get stuck. The resultant construction traffic will further damage the fragile road surfaces. The B3098 itself has serious accident black spots including one near the proposed junction. It carries a dangerous mix of road users, notably with many cyclists. Increasing the volume of traffic on this inadequate route will only make the situation worse.</p> <p>The only way this plan could potentially be made sound is by halving the number of dwellings and making provision for green space, a childrens' play area, woodland, screening and by having dual access roads.</p> <ol style="list-style-type: none"> 1. The inclusion of this many dwellings and at such a density in this location will have a really damaging impact on the special landscape value of the area and the conservation of Bratton's heritage and history. 2. The proposed development is completely out of place in the location proposed and more appropriate to a town centre setting. 3. The local planning authority has already twice rejected development plans for the site in question and considered that "the edge of the existing village is well defined and that the housing development proposed, together with the access road thereto across the field in front, would be a substantial intrusion into the rural landscape, and would therefore be detrimental to the character and scenic quality of the area." Nothing else has changed in the area so these decisions should still stand. 4) If the plan should be adopted (in any form) then measures MUST be put in place to restrict HGV and construction traffic from using Court Lane, and attempting the dangerous junction onto the B3098 at Tollgate House. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	907	Consultee Mr David Wingrove Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Ashton Keynes Parish Council Person ID: 1126124		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		The Whole Plan			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Ashton Keynes Parish Council supports this document in general. In particular, it supports: Section 6 – Amended Settlement Boundaries - A46 - Proposed amendments to the settlement boundary for Ashton Keynes (Page 124)				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	908	Consultee Mr Robert Quarm	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126187		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Development H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan to site 640 houses on the Netherhampton Road seems to me to be unfeasible. Strategically the site is poorly placed. There is minimal local employment so residents would have to travel through Salisbury to access local jobs or commute elsewhere, access secondary schools or other of the City's amenities. The proposed site is not within walking distance of the City Centre which would also increase traffic.</p> <p>Most of the recent developments have been placed to access the Park and Rides – this development does not and would significantly increase traffic along the Harnham Road and Gyratory which is already at capacity and is not conducive to sufficient alteration to ameliorate the problem. This would result in an increase in noise pollution, air pollution and a decrease in safety.</p> <p>I doubt development could be successful without a proper relief road for the whole of Harnham.</p> <p>5.130 Note: The site was previously rejected.</p> <p>5.132 indicates that 'The site has a strategic role as a possible destination for the relocation of businesses to allow the redevelopment of the Churchfields strategic allocation of the WCS'</p> <p>It is unclear how much of Churchfields Industrial Estate might be incorporated in or near the new development. What assurances could be given that this would not eventually constitute the whole of Churchfields? Heavy traffic would further disrupt the Netherhampton and Harnham Road and gyratory and lead to an increase in HGV's, traffic fumes and noise for the residents on top of that from the extra residential quota. There must be figures for the traffic requirement of the current Churchfields site – it would be interesting to know what this is in terms of volume, type of vehicle and peak timings as well as the original source locations of the service traffic.</p> <p>I agree with a previous correspondent that there is potential for some housing near to the Britford Park and Ride and the Hospital which should be considered in preference; this area would also benefit from a new School.</p> <p>It might also be sensible to move the Churchfields development and some housing nearer the A303 as it now looks as though plans to widen the A303 (including Stonehenge tunnel) will come to fruition. Locating Churchfields on the North side of Salisbury would likely decrease traffic coming into Salisbury residential areas, improve access for the site and allow for future expansion, which would be to Salisbury's benefit.</p> <p>5.136. It would be useful to know what improvements could be made that could ameliorate the cumulative impacts of the proposal. Lack of prior planning in this area is not encouraging.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	909	Consultee Mr Ian Plowman Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Yatton Keynell Parish Council Person ID: 1126488		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Having consulted the residents of the Parish and discussed the proposals with Baroness Jane Scott of Bybrook, Yatton Keynell Parish Council (YKPC) has the following comments on the inclusion of this site in the draft Housing Site Allocations Plan.</p> <p>Principle This site has a history of planning applications for commercial usage and currently, a beneficial interest is registered at HM Land Registry in the name of Charles Church Developments Limited.</p> <p>We considered the potential benefits that might accrue to the local economy from this development and we have discussed the proposal with representatives from the school governors and the GP practice. Both have indicated they would benefit from a manageable increase in numbers and It is therefore concluded that the development of this site with up to 30 houses will serve to maintain local commerce and services. YKPC is aware that many residents of Farrells Field object to the inclusion of site 482 in the SLHAA. We understand their concerns and agree that the issues they have raised will need to be fully addressed in the event that Planning Permission for a development is submitted. However, at this stage in the process, YKPC has no compelling objection to the principle of site 482 being included in the SLHAA</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	910	Consultee Mr Ian Plowman Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Yatton Keynell Parish Council Person ID: 1126488		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Having consulted the residents of the Parish and discussed the proposals with Baroness Jane Scott of Bybrook, Yatton Keynell Parish Council (YKPC) has the following comments on the inclusion of this site in the draft Housing Site Allocations Plan. Sustainability Appraisal We consider that the Sustainability Appraisal may have understated the adverse effects associated with this site. Two have been included; the need to reinforce the local water network and the problems associated with surface water drainage. Both are rated as moderate. YKPC believes that the known surface water drainage problems in this area could pose a greater problem than is being suggested. In particular, should a SuDs system be contemplated, its long term management and associated cost would need to be considered. YKPC wishes to record that any detailed plans that are submitted for this site in the future must include a rigorous appraisal of these issues together with robust plans for the installation and management of any necessary amelioration schemes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	911	Consultee Mr Ian Plowman Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Yatton Keynell Parish Council Person ID: 1126488		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Having consulted the residents of the Parish and discussed the proposals with Baroness Jane Scott of Bybrook, Yatton Keynell Parish Council (YKPC) has the following comments on the inclusion of this site in the draft Housing Site Allocations Plan. Sustainability Appraisal It is also our view, in the light of recent experience in the village, that the sewage system would need to be enhanced. Notwithstanding that a pumped system may be required for the development itself, we doubt that there is sufficient capacity in the current system to cope with an additional 30 dwellings. Again we would look to see that a proper appraisal of sewer capacity is conducted and any recommendations for improvement implemented.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	912	Consultee Mr Ian Plowman Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Yatton Keynell Parish Council Person ID: 1126488		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Having consulted the residents of the Parish and discussed the proposals with Baroness Jane Scott of Bybrook, Yatton Keynell Parish Council (YKPC) has the following comments on the inclusion of this site in the draft Housing Site Allocations Plan.</p> <p>Sustainability Appraisal</p> <p>We also note that two options have been set out for vehicular access; one directly from the B4039 and the alternative through Farrells Field. YKPC strongly prefers the creation of a new access directly from the B4039. In this regard, the Chairman spoke to Baroness Scott of Bybrook on 24 August 2017 and she too supported this option and agreed to notify officials accordingly. At the meeting of YKPC on 4 September 2017 she confirmed that this had been done.</p> <p>Wiltshire Council had no objection to such access when a previous application for a commercial development was lodged, (N/10/3160), and an email from the Development Control Engineer, Sustainable Development dated 31 August 2010 records that he simply wished to be consulted over the visibility splay. Both the Baroness Scott and the Chairman acknowledged that pedestrian access through Farrells Field might be beneficial as this would aid the partial separation of vehicular and pedestrian traffic.</p> <p>We therefore request that the draft SLHAA is amended to state that the preferred vehicular access to any new development is to be directly from the B4039. We would also wish to put on record that YKPC will object to any detailed plans that do not include provision for vehicular access directly from the B4039.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	913	Consultee Mr Ian Plowman Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Yatton Keynell Parish Council Person ID: 1126488		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Having consulted the residents of the Parish and discussed the proposals with Baroness Jane Scott of Bybrook, Yatton Keynell Parish Council (YKPC) has the following comments on the inclusion of this site in the draft Housing Site Allocations Plan. Sustainability Appraisal It should also be noted that according to Wiltshire Council's records, the track that runs from the B4039 between Blacksmith Close and the By Brook Valley Primary School does not appear to be a public right of way. YKPC recommends that this is regularised as by long standing custom this track is used as such. In addition the draft SHLAA describes site 157 as partially completed or committed. This site is Blacksmith Close and was completed as long ago as 2007. It might be appropriate to amend the record accordingly.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	914	Consultee Mr Colin Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125356		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2) The Plans run Contrary to Housing Development Strategy: The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”. Full consultation necessary with Environment Agency, Highways Agency, Wessex Water, Natural England, Heritage England.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure the above points are taken into consideration.				

Comment ID:	915	Consultee Mr Colin Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125356		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3) Insufficient Transport Structure: Para 5.128 Draft Allocation Plan quotes: "The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS". There is absolutely no evidence to support this and it is misleading of the Council to suggest otherwise. The Salisbury Transport Strategy of November 2012, acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating near full capacity. Since then traffic has increased considerably (figs) and I see no new plans in place to accommodate the dramatic increase that would occur if the Netherhampton Road allocations were allowed. The Plan already acknowledges in Para 5.136 that the current Transport Strategy does not contain measures to support the proposed allocations:</p> <p>"Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy."</p> <p>As a daily user of the A3094 I see little scope to widen this road in many places as it is constrained by housing on both sides, has several busy junctions and critical traffic pinch points. No solution to the traffic problems that Netherhampton and Harnham residents suffer has been forthcoming in the 23 years I have lived here, and the likely implications of the proposed housing allocations are being woefully ignored. Page 161 of the South Wiltshire Core Strategy (covering S1027 and S1028) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". I can find no evidence that this has been carried out.</p> <p>Full consultation necessary with Environment Agency, Highways Agency, Wessex Water, Natural England, Heritage England.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure the above points are taken into consideration.				

Comment ID:	916	Consultee Mr Colin Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125356		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>4) Flooding and Drainage Impacts have not been addressed: I find it worrying that the Council is considering building on areas that have a well- documented flood risk. The flood warning alert area for the River Nadder at West Farnham is contiguous with S1027. By reducing the area of natural flood plain and increasing run off, this plan can only worsen the situation. Netherhampton and all of the fields to the north of the A3094 are routinely waterlogged and S1037 is often under water in wet periods. There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. I understand the existing sewage pumping infrastructure is already operating at near capacity. Full consultation necessary with Environment Agency, Highways Agency, Wessex Water, Natural England, Heritage England.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure the above points are taken into consideration.				

Comment ID:	917	Consultee Mr Colin Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125356		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5) Increased Noise & Pollution</p> <p>A proposal in 2014 for around 70 houses, plus a public house or hotel, on a site in Netherhampton was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from over 700 dwellings.</p> <p>The recent road works along Harnham New Bridge caused major traffic jams in Harnham, Netherhampton and Wilton because of increased traffic using the A3094 as a diversion. The increased noise and pollution, not to mention the risk to cyclists and pedestrians, was a major issue for Harnham and Netherhampton residents. I estimate at least 600 more vehicle journeys per day will be generated by the 1,600 (700 x 2.3 avg. household) dwellers.</p> <p>Full consultation necessary with Environment Agency, Highways Agency, Wessex Water, Natural England, Heritage England.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure the above points are taken into consideration.				

Comment ID:	918	Consultee Mr Colin Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125356		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	6) Loss of Agricultural Land: The National Planning Policy Framework (NPPF) protects high quality agricultural land such as the proposed sites along Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan. Full consultation necessary with Environment Agency, Highways Agency, Wessex Water, Natural England, Heritage England.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure the above points are taken into consideration.				

Comment ID:	919	Consultee Mr Colin Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125356	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>7) Loss of Visual Amenity and Heritage Landscape The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, I understand partly because of the negative impact on the unique view of the Cathedral spire from the south and west. No adjustments to the siting or screening of hundreds of houses will ameliorate the severe impact that the proposed development would have on this unique landscape and its world famous heritage. Full consultation necessary with Environment Agency, Highways Agency, Wessex Water, Natural England, Heritage England.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure the above points are taken into consideration.				

Comment ID:	920	Consultee Mr Colin Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125356	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	8) Lack of Employment in this Area The Core Strategy acknowledges that the key employment sites in Salisbury are to the North of the city. The Harnham Business Park has lain mostly unused and unwanted for years so it is pointless to build hundreds of new houses in a village to the south of the city, with little local employment, poor transport and lack of infrastructure. Full consultation necessary with Environment Agency, Highways Agency, Wessex Water, Natural England, Heritage England.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure the above points are taken into consideration.				

Comment ID:	921	Consultee Mr Ian Cadzow Person ID: 1126508	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster site allocations and settlement boundary		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advise that Wiltshire proposes to:</p> <ul style="list-style-type: none"> • Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and • Allocate new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026. <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster as I consider your draft plan is not sound for the following reasons:</p> <ul style="list-style-type: none"> • Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development and merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers, a site which is capable of significant expansion with provision of relevant infrastructure and suitable access. • Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after extremely careful and detailed analysis selected the Warminster West Urban Extension as the site for 1 development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and most importantly provide the supporting infrastructure that will make the site sustainable. • Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets. <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>			

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	922	Consultee Mr Ian Cadzow	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126508		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster site allocations			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Council's Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	923	Consultee Partridge Homes (Cotswolds)Ltd Person ID: 1037118	Agent Mr Paul Jenkins SF Planning Limited Person ID: 1126480	Do you consider the draft WHSAP is legally compliant?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	No
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Partridge Homes (Cotswolds) Ltd Response to pre-submission draft Wiltshire Housing Site Allocations Plan September 2017 SF Planning Limited has been instructed by Partridge Homes (Cotswolds) Ltd ('Partridge Homes') to submit a response to Wiltshire Council's pre-submission draft Wiltshire Housing Site Allocations Plan ('HSAP'). This representation has been submitted in the backdrop of our Client's interest in land at Dairy Farm Bungalow, Ashton Keynes, which has a pending planning application (Reference: 17/06974/FUL) for additional housing to meet local needs as identified in the Ashton Keynes Neighbourhood Plan. The site at Dairy Farm Bungalow (SHLAA site 702) is currently not proposed to be allocated for housing within the HSAP, despite it being the only site within Ashton Keynes which made it through to Stage 2b of the assessment of large villages as detailed within the Malmesbury Community Area Topic Paper, Wiltshire Council (June 2017). There is no clear rationale for not allocating this site within the Topic Paper Dairy Farm, Ashton Keynes should be considered alongside or instead of other "Large Village" allocations within the draft HSAP. Dairy Farm Bungalow, Ashton Keynes As the table overleaf demonstrates, Dairy Farm should be considered alongside and/or replace the site allocations within "Large Villages" detailed within Policy H2 and table 5.3 North and West Wiltshire Housing Market Area. All allocations detailed below are either all or part outside current settlement boundaries and are within settlements of comparable sizes. Indeed, all settlements proposed to be allocated housing within the HSAP are actually smaller in population. [REFER TO TABLE IN ORIGINAL REPRESENTATION REPORT] The Dairy Farm Bungalow site is currently agricultural land/fields in very close proximity to the village centre, the school and is adjacent to the existing developed area along Gosditch to the south of the site and the pumping station to the northwest. The site is very close to the services within Ashton Keynes including village hall, village shop, public house and bus routes through the village and beyond. Additional housing at this location is no more or less sustainably located than existing adjacent housing or any of the proposed allocations within the table above. This parcel of land is a logical and well-contained extension to the village. The site would preserve the settlement pattern and not result in development sprawl into open countryside. The site does have constraints including its location within a conservation area and its position adjacent to other heritage assets as well the very northern part of the site being located within a flood zone. These can be overcome through the detailed design and technical solutions within the final scheme (as demonstrated within the current planning application). Recommendation: These matters should not prevent the allocation of the site for housing which would deliver much needed affordable housing (as identified within the neighbourhood plan) in a sustainable location. All above matters have also been robustly addressed within the currently pending planning application for additional housing on the site.				

	See accompanying cover letter.
Attached files (Please see Objective)	4711697
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	924	Consultee Partridge Homes (Cotswolds)Ltd	Agent Mr Paul Jenkins SF Planning Limited	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1037118	Person ID: 1126480	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It should be clearer within the HSAP housing numbers are indicative and are not maximum figures; Housing Need Core Policy 1, 2 and 13 of Wiltshire's Core Strategy relating to "indicative" housing numbers should be regarded as the minimum requirement. This is in accordance with paragraph 47 of the NPPF, which seeks to significantly boost the supply of housing. Our Client welcomes acknowledgement of this at paragraph 4.36 of the draft HSAP, which sets out that levels of housing development in settlements and rural areas are indicative levels of growth and are approximate further confirming these are neither minimum nor maximum figures. However, this fact needs to be made clearer throughout the site allocation policy tables. In addition, the Government are consulting on a number of proposals to reform the planning system to increase the supply of new homes including a standard method for calculating local authorities' housing need, which will need to be reflected within the HSAP as required. Recommendation: Within the site specific policy tables (i.e. H1 – H3) it should explicitly reference the fact that these "site allocations" for housing development in settlements and rural areas are "indicative levels" of growth and are approximate and not maximums, as the current wording is unclear. The updating of the methodology for calculating housing need should be incorporated as required.</p> <p>See accompanying cover letter.</p>				
Attached files (Please see Objective)	4711697				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	925	Consultee Partridge Homes (Cotswolds)Ltd	Agent Mr Paul Jenkins SF Planning Limited	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1037118	Person ID: 1126480	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The general development boundary approach advocated in the HSAP is outdated and not sufficiently flexible to boost housing supply</p> <p>Development Boundary Approach</p> <p>It is clear the Core Strategy indicates housing requirements for settlements should be dealt with on a flexible basis, given the housing targets are a minimum requirement. It is difficult to see how an inflexible development boundary approach proposed within the draft HSAP could be considered to comply with the NPPF and minimum housing requirements within the Core Strategy. The inflexible approach will also result in the potential future housing which may be derived from the updating of housing need calculations, being impossible to meet.</p> <p>Recent appeal decisions have highlighted the failure by the Council to have regard to housing targets set out in the Core Strategy as a minimum requirement.</p> <p>In this regard, a recently allowed appeal decision on land at Boreham Road, Warminster (Appendix 1 - Appeal Ref: APP/Y3940/W/16/3150774) on the 20th July 2017 is relevant. This site was also outside the settlement boundary as defined within the 2006 NWLP and locally adopted NP but close to local services.</p> <p>This decision was called in by the Secretary of State (SoS) who concluded the Council at the time of the decision could demonstrate a 5 year supply of housing land but;</p> <p>“.....that this does not negate the benefits arising from the proposed development, particularly the contribution to custom built housing and affordable housing. In line with paragraph 47 of the Framework, which requires local authorities to boost significantly the supply of housing, he takes the view that the five-year requirement is a minimum and not a cap.” [Our emphasis] (Paragraph 17 – Appendix 1)</p> <p>The Secretary of State went further in the decision at Warminster and confirmed “significant weight” was attributed to affordable housing provision, the location of the development and proximity to services, provision of the new homes bonus and jobs during construction.</p> <p>This recent and highly relevant appeal decision and further highlights the need that housing requirements set out in the Core Strategy are indicative minimum figures and not a “cap” on further sustainable housing development. This decision further demonstrates the settlement boundary approach is outdated and will not help to boost housing supply.</p> <p>In summary, the general approach settlement boundary approach is likely to;</p> <ul style="list-style-type: none"> Result in potentially harmful “infill” development within the settlements as every available area of land competes for development resulting in a potential reduction in the landscape quality and character of that village; Increase land values, which will result in the delivery of less on site affordable housing; Constrain housing supply as the approach is crude and inflexible; Restrict the supply of medium scale sites which provide the opportunity to secure on site affordable housing; Result in garden land development within houses within a settlement boundary. <p>Recommendation: We would request that the need for the settlement boundary is reviewed to ensure development which cater for social needs (including affordable housing, and self-build housing) in sustainable locations are acceptable in principle and can be approved to help boost</p>				

	housing supply and meet and exceed minimum housing targets. See accompanying cover letter.
Attached files (Please see Objective)	4711697
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	926	Consultee Partridge Homes (Cotswolds)Ltd	Agent Mr Paul Jenkins SF Planning Limited	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1037118	Person ID: 1126480	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.34			Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The development boundary more specifically proposed for Ashton Keynes is not sufficiently flexible to boost housing supply including the required affordable homes outlined in the adopted Neighbourhood Plan;</p> <p>Ashton Keynes Settlement Boundary</p> <p>As currently proposed within the draft Wiltshire Housing Site Allocations Plan, the “settlement boundary” around Ashton Keynes is proposed to shrink.</p> <p>This is despite a general national policy shift to seek to boost housing supply. More specifically, at a local level there is a clear need, as set out within the adopted Neighbourhood Plan (‘NP’) for the area, to provide more affordable homes, which are more likely to be delivered with open market housing cross-subsidy.</p> <p>The housing objectives within the NP place a high priority on the provision of affordable housing to meet the needs of the parish along with ensuring housing is available to meet local people’s needs as they change.</p> <p>Given the settlement boundary around Ashton Keynes is proposed to be reduced in size, there is very little prospect of a viable and deliverable site coming forward of a scale that will be able to provide onsite affordable housing.</p> <p>Recommendation: As above, we would request that the need for the settlement boundary is reviewed to ensure development which cater for social needs (including affordable housing, and self-build housing) in sustainable locations are acceptable in principle.</p> <p>See accompanying cover letter.</p>				
Attached files (Please see Objective)	4711697				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	927	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Appendix F Table F4		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With reference to the development altering the character and appearance of the area the 'Site Overview' refers to a potential capacity of approximately 32 dwelling, "although mitigation could reduce this number. This conflicts directly with paragraph 6.26 and associated Table 6.7 increasing the capacity to 40. What is the site's assessed capacity? 32, less than 32 or 40? The Plan is unsound due to contradictions and conflicts.</p> <p>With reference to the development altering the character and appearance of the area the 'Site Overview' refers to a potential capacity of approximately 32 dwelling, "although mitigation could reduce this number. This conflicts directly with paragraph 6.26 and associated Table 6.7 increasing the capacity to 40. What is the site's assessed capacity? 32, less than 32 or 40? The Plan is unsound due to contradictions and conflicts.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	928	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Table G3, Section Historic Environment states, “Any development on this site should nonetheless ensure that the significance and setting of the Conservation Area and Listed Buildings maintain the local distinctiveness reinforced. This would be possible to mitigate through type, size, design and layout.”</p> <p>As section 6.7 seeks to increase the nominal dwelling rate from 32 to 40 this cannot be achieved. The plan is contradictory and not sound.</p> <p>Primarily, the site should not be allocated to maintain the distinctive nature of this village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	929	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		6.7 and F4		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The capacity to accommodate 40 dwellings is unachievable and unsound. The existing 1970s Manor Fields estate, within Bratton, is on a plot of approx. 26057 m2 with 66 dwellings of mixed type (detached and semi-detached). Averaged, including open space and essential infrastructure, that's approx. 395 m2 per property.</p> <p>Site 321 is a plot of approx. 12090 m2. With 40 dwellings proposed, of mixed type, this averages at 302 m2 per property.</p> <p>Parking on the Manor Fields development is a significant problem, as vehicle ownership exceeds that planned for and expected in the 1970s. Effective parking, with a housing density 125% of that of Manor Fields, on Site 321, is unachievable. Parking conflicts at/around the site/B3098 interface will likely occur. Parking maybe forced onto the B3098 as there will be insufficient physical space available.</p> <p>Expressed alternatively, The Site 321 density proposal is equivalent to increasing Manor fields from 66 to 83 dwellings. To quote Table F4, Assessment Results, "The site is in a reasonably accessible distance from the limited services available in Bratton, but overall residents are likely to rely upon use of the private car to reach larger services and facilities (SA Obj. 10). "</p> <p>The Topic Paper acknowledges car use will be high and seeks to develop beyond an achievable density.</p> <p>Site 321 is not suitable for this density of housing. In the surrounding area there are no off-site options. Site 321 should not be developed. Site 321, if developed, cannot support 40 dwellings.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	930	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Appendix G, Assessment Criteria and output from Stage 4a of site selection process. Page 56 states 40 dwellings being modest growth. To a village of 500 dwellings (not 819) that represents a 8% growth. That is major, not modest.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	931	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Appendix G, Assessment Criteria and output from Stage 4a of site selection process. Page 57 states....."That said, there may be further limited windfall development in the form of infill within the settlement boundary, but this would unlikely to generate significant benefits for the village. It's apparent that Bratton PC does have land available within the settlement boundary of suitable size to accommodate the needs of the Parish Housing Needs Survey of 2014. Reword acknowledging that alternatives do exist.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	932	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		F4		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The assessment criteria results from Stage 3 distort the truth. The answer to question 8, receiving a +++ result is inaccurate, as it does not provide everyone an opportunity to live in good quality, affordable housing. Any housing supply is finite. Reassess and depict an accurate result.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	933	Consultee Barratt Homes	Agent Ms Robyn Nicholl Planning Officer	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 392036	Barton Willmore Person ID: 1126545	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	6.1 We support the allocation of 'Policy H2.3' for Land south of Elizabeth Way, but we remain of the view that there are a number of significant issues within the Pre-submission draft of the Housing Site Allocations Plan, identified throughout this Representation, that Wiltshire Council need to address.				
Attached files (Please see Objective)	4711773 / 4711774				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure that our reps can be expanded upon if necessary and to fully explain why we feel the current plan is unsound.				

Comment ID:	934	Consultee Barratt Homes Person ID: 392036	Agent Ms Robyn Nicholl Planning Officer Barton Willmore Person ID: 1126545	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	1.0 INTRODUCTION 1.1 This representation is submitted on behalf of Barratt Homes in respect of their land interests to the south of Elizabeth Way, Trowbridge. It responds to the Pre-submission Consultation evidence base which includes; Topic Papers, Technical Reports and Consultation Statements, and in doing so, outlines how development of the Land at Elizabeth Way would contribute to the achievement of the proposed spatial and sustainability objectives. A location plan for the site has been attached to Appendix 1. 1.2 The initial scoping exercise for the Wiltshire Housing Site Allocations DPD began in April 2014 with both formal, and informal consultations taking place with Town and Parish Councils. The main bulk of evidence gathering and plan preparation took place from January 2015, up until May 2017. On 20th June 2017, the pre-submission draft of the Wiltshire Housing Site Allocations DPD was submitted to Cabinet, and was subsequently approved. 1.3 The Pre-submission Representation form requests feedback on whether it is commonly considered that the Site Allocations Plan is sound. There is much in the plan that we support, but at present, our response is that the draft Site Allocations Plan is unsound as it has not been positively prepared and is not justified. This is primarily due to the fact that the indicative housing requirement which has been set for Trowbridge has not been met through the proposed allocations. We have set out our justification for reaching this view in more detail in the following sections.				
	2.0 SOUNDNESS OF THE PLAN 2.1 This section of the representation seeks to review relevant planning policy relating to the provision for housing, and on this basis, whether the local planning authority has prepared a Local Plan that is sound. Delivering housing need 2.2 The NPPF sets out 12 Core Principles which have been formed to underpin plan making, one of which is particularly relevant to making provision for housing. This states that planning should, “Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other				

development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities” (NPPF, para 17)

2.3 Further guidance on the delivery of housing is set out in Para 47 of the NPPF and states,

“To boost significantly the supply of housing, local planning authorities should: use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements...” (NPPF, para 47)

2.4 In terms of ‘Local Plan making’ it is critical to the success of a plan that the Local Planning Authority positively plan to deliver homes, whilst also allowing for some flexibility. Paragraph 157 of the NPPF states that,

“Crucially, Local Plans should: Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework.” (Paragraph 157)

2.5 The NPPF is clear that Plans will need to ensure the delivery of their strategy for housing and the main way of doing so is the allocation of specific, sustainable and deliverable sites.

Soundness Test

2.6 When assessing whether a plan is considered to be sound, Paragraph 182 of the NPPF identifies the 4 main factors which the LPA need to consider:

“A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:
Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.” (NPPF, para 182)

2.7 The deliverability of a Plan features as one of the key tests of soundness and the PINS Procedural Practice in the Examination of Local Plans (June 2016, para 1.1) stresses this point:

...“the plan should focus relentlessly on the critical issues and the strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the plan is to address the critical issues as far as possible.” (Section 1: Pre-submission, Para. 1.1)

2.8 The Wiltshire Housing Site Allocations Plan is not sound as it is not positively prepared, justified, effective, nor consistent with national policy on housing delivery and plan making. This plan should be prepared based on the Wiltshire Core Strategy objectives which seeks to meet the objectively assessed housing need by the end of the plan period.

2.9 We set out the reasons why the draft plan is unsound in its current form below:

The plan is not positively prepared because less than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, proving that the draft proposals have not been consistently prepared using the evidence gathered.

The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014.

The plan is not justified as it does not propose to make efficient use of land to be allocated through the Site Allocations Plan.

3.0 INDICATIVE HOUSING REQUIREMENT FOR TROWBRIDGE

3.1 The six draft housing allocations identified within Trowbridge will provide land for approximately 800 dwellings. This figure falls significantly short of the indicative minimum requirement of 2,020 dwellings set for Trowbridge over the plan period, by around 1,220 dwellings. Topic Paper 4 'Developing Plan Proposals' of the Housing Site Allocations evidence base has identified two reasons for this under provision of housing within Trowbridge:

The delay of developing Ashton Park Urban Extension, which was allocated through the Wiltshire Core Strategy for 2,600 dwellings to be built on site within the plan period, up to 2026. It has now resulted in only 1,600 dwellings being built within the plan period and the remaining 1,000 dwellings will be built post 2026. This accounts for 1,000 dwellings out of the 1,220 dwellings shortfall;

Inability to identify land free from environmental constraints which could compensate for the consequences of the delay to the Ashton Park development.

3.2 The purpose of the Wiltshire Housing Site Allocations process is to address the shortfall of housing over the remainder of the plan period, up to 2026. Once adopted, the Plan will become an implementation mechanism to the Wiltshire Core Strategy (WCS) which should ensure that the housing requirements set by the WCS are met. It is important to note that Paragraphs 77-79 of the Inspector's Report for the Wiltshire Core Strategy (dated December 2014) refers to Wiltshire's Objectively Assessed Need (OAN) being significantly higher than planned for through the Core Strategy, being in the region of +44,000 dwellings,

"Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly." (Inspectors Report, Paragraph 80)

3.3 With this in mind, it is critical that the Wiltshire Housing Site Allocations Plan is positively prepared to allocate sufficient land as required to address the current undersupply of housing within Trowbridge that has arisen due to strategic site delays. The acknowledgement that 1,000 dwellings previously anticipated to be built at Ashton Park will now be delayed until the next plan period is reason to ensure that sufficient flexibility is included through the Site Allocations Plan,

"Consequently, I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more." (Inspectors Report, Paragraph 81)

3.4 In accordance with Paragraph 47 (bullet point one) of the NPPF, in order for the plan to be sound it must use the baseline evidence gathered to ensure that the full objectively assessed housing needs set out in the Core Strategy are met. This is currently not the case, and is demonstrated by the 1,200 dwelling shortfall in Trowbridge.

4.0 FIVE YEAR HOUSING LAND SUPPLY

4.1 In order to make the plan sound, the Wiltshire Housing Site Allocations Plan should identify sufficient land to meet the overall housing requirement for Trowbridge.

4.2 Wiltshire Council have previously stated that the ‘Liverpool Method’ appropriately reflects the delivery strategy set out within the Wiltshire Core Strategy for calculating housing supply. The ‘Liverpool method’ of calculating 5-year supply aims to spread the delivery of housing over the plan period, and not to front-load any under-provision to date. We are of the view that the ‘Sedgefield approach’ conforms more closely with the requirement to plan positively as it seeks to boost significantly the supply of land for housing in the early part of the plan period. In either method, in order to rectify the current housing shortfall over the remainder of the plan period (up to 2026) the Site Allocations Plan must maximise the identified sustainable development opportunities within Trowbridge, which will in turn help to bolster the housing supply in the area.

4.3 Chapter 5 of ‘Topic Paper 4- Developing Plan Proposals’ of the evidence base focuses on the requirements set for the North and West Wiltshire Housing Market Area (HMA). Table 5.6 (below) has been included, which itemises the Councils projected level of housing supply from 2017–2026 for the North and West HMA. As you can see it is consistently above 7 years up to 2024, when supply drops to 5.3 years in 2025/2026.
[refer to table in attached representation document]

4.4 A housing trajectory has not been included within the evidence base, instead the Housing Land Supply Statement published in March 2017 is referred to, which identifies a 5.73 years supply (Appendix 2). This raises the question, are Wiltshire Councils updated housing supply projections realistic?

4.5 Further to this, we refer to the appeal case at ‘Land to the West of A365 Shurnhold, Melksham’ (APP/Y3940/W/15/3132915), decided in October 2016, where the Inspector concluded a housing supply of 4.25 years within the North and West HMA. As such, it is difficult to understand how this level of delivery, set out in the table above, will be achieved within the North and West HMA.

4.6 We have seen no justification to demonstrate how the stated level of housing provision will achieve the levels set out in the plans 2016 trajectory.

4.7 In order to make the plan sound additional evidence needs to be provided as to how the Councils will maintain a 5-year supply. In order to assist them in doing so:
Wiltshire Council need to maximise housing capacity within the identified proposed allocations;
Ensure that the proposed Allocations are deliverable sites, and able to come forward soon after the adoption of the plan.

Attached files (Please see Objective)

4711773 / 4711774

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To ensure that our reps can be expanded upon if necessary and to fully explain why we feel the current plan is unsound.
6.2 The Housing Site Allocations Document is unsound as it has not been positively prepared and is not justified due to the fact that the indicative housing requirement which has been set for Trowbridge has not been met through the proposed allocations.
The plan is not positively prepared because less than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, proving that the draft proposals have not been consistently prepared using the evidence gathered.

Comment ID:	935	Consultee Barratt Homes Person ID: 392036	Agent Ms Robyn Nicholl Planning Officer Barton Willmore Person ID: 1126545	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.3 Elizabeth Way			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5.0 TECHNICAL ISSUES</p> <p>5.1 The site at Elizabeth Way (SHLAA 263) encompasses approximately 16.33ha of land is proposed to be allocated for a total of 205 dwellings. It is acknowledged that due to the proximity of the site to Hilperton Gap, and the location of the Bradford and Bath Bats SAC to the south of Trowbridge, the site may have constraints which will need to be addressed prior to development. In order to gain a better understanding of these issues Barratt Homes have undertaken various technical assessments on the site, south of Elizabeth Way, which have proven that a higher quantity of housing is possible on the site.</p> <p>5.2 A Vision Document has been produced, submitted alongside this representation, which sets out the proposed design principles for the site and summarises the specialist technical input received to date. A summary of the key issues is set out below.</p> <p>Site Boundary</p> <p>5.3 In respect of the site boundary identified for the proposed allocation at Elizabeth Way set out within 'Policy H2.3' we would like to highlight a critical point, the site boundary identified on the plan does not align with Elizabeth Way Relief Road. We understand from discussions with Planning Policy Officers that this is an error that will be corrected prior to the submission stage, and will ensure that the site boundary for the proposed allocation meets the boundary of Elizabeth Way.</p> <p>5.4 Without this change the Plan is not sound as it does not make efficient use of land and is therefore not the most appropriate strategy when considered against all alternatives.</p> <p>Capacity of Site</p> <p>5.5 The site at Elizabeth Way (SHLAA 263) has been identified for the allocation of 205 dwellings, which is significantly lower than what the site could sustainably deliver. This raises the issue of major under-development of the site which, in combination with the required housing figures, highlights the fact that the current proposed allocation has not been positively prepared or justified.</p> <p>5.6 Using the evidence gathered by the technical assessments we have calculated that the site in question can sustainably accommodate approximately 175 dwellings, which in combination with the current planning application submitted to the west of the site (16/00672/OUT) would equate to 355 dwellings, prior to the eastern section of the site allocation coming forward.</p>				

	<p>5.7 In order to make the plan sound, the allocation for the land at Elizabeth Way should be increased significantly to properly reflect the true capacity of the site.</p> <p>the Plan does not propose to make efficient use of land to be allocated by increasing numbers where possible, which is unsustainable and not consistent with National Policy. The Plan is not justified as it does not propose to make efficient use of land to be allocated.</p>
Attached files (Please see Objective)	4711773 / 4711774
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure that our reps can be expanded upon if necessary and to fully explain why we feel the current plan is unsound.

Comment ID:	936	Consultee Barratt Homes	Agent Ms Robyn Nicholl Planning Officer	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 392036	Barton Willmore Person ID: 1126545	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Ecological Constraints</p> <p>5.8 The ecological investigations, including Badger and Bat surveys, carried out to date have not raised any detrimental issues which would affect the delivery of the site, or preclude the site from development. Walked transect surveys have been completed in May and July, with a final survey planned for September 2017. Automated detectors have been deployed for a period of five nights per month between May and August (inclusive), and these will be deployed again in September and October 2017.</p> <p>5.9 The below table presents the results of the automated detector surveys between April and August (inclusive). The table includes the total number of passes (B) recorded and average passes per night (B/n) for all species. [refer to table in attached representation document]</p> <p>5.10 Overall, activity appears to be fairly low with the exception of Serotine, which is higher than would be expected, but we do not consider that this matter acts as a constraint to the development of the site.</p> <p>5.11 The ecological work undertaken by BSG Ecology Ltd. has been used to inform the Concept Masterplan, and this is reflected through the design of open space on site. The Masterplan of the site is attached at Appendix 2.</p>				
Attached files (Please see Objective)	4711773 / 4711774				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure that our reps can be expanded upon if necessary and to fully explain why we feel the current plan is unsound.				

Comment ID:	937	Consultee Mrs Sally Armitage	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125432		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		site numbers H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The existing roads are totally inadequate to support the large quantity of housing proposed. Wiltshire Council wishes to encourage sustainable transport but as employment opportunities in the town have diminished since the Core Strategy was created, residents would need to use cars, often for considerable distances, for employment opportunities. There are insufficient school places for more children in this area. Netherhampton village is close to flood zones. Any further building towards Harnham would potentially add to the risk of flooding. Netherhampton village is already likely to increase substantially in size if the proposed farm development is approved (a site which is not even mentioned on the site allocation plans.) As a small village, only 'infill' development should be permitted. (core strategy 4.34). Core Strategy 4.34 also states that development should not be imposed in sensitive landscape areas. The approach to Salisbury from Netherhampton is at present a beautiful landscape area which would be spoiled. Increasing quantities of traffic on the A3094 already endanger the health of residents living near the road due to the hazard of toxic emissions from vehicles. (see Public Health Appendix 4 Salisbury 35). Idling traffic in queues at Park Wall and Harnham would be particularly dangerous.</p> <p>In order to be justified or effective the A3094 and the junctions at Park Wall and Harnham would have to be improved before any development took place. HGV traffic on the road should be diverted wherever possible using other routes and a lower speed limit imposed in order to improve air quality. The development should be considerably smaller and only on the southern side of the road. More local school places and employment opportunities would need to be in place. Bus transport and more cycle lanes would need to be available.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan				

Comment ID:	938	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		F4		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The answer to question 12, receiving a + result is wholly untrue. The proposal provides no employment land or employment opportunities. Reassess and depict an accurate result.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	939	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Appendix G Table G3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The eastern boundary of site 321 is a long established habitat of Slow Worms and the area has a significant Bat population. Presence either of these species does not appear to have been identified in either the Community area Topic Paper or supporting documents. Identify the protected species habitat and extent now and consider whether any development would be appropriate at this site.</p> <p>The eastern boundary of site 321 is a long established habitat of Slow Worms and the area has a significant Bat population. Presence either of these species does not appear to have been identified in either the Community area Topic Paper or supporting documents. Identify the protected species habitat and extent now and consider whether any development would be appropriate at this site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	940	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Appendix G Table G3		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The proposed density (of up to 40 dwellings) is not conducive to accommodating PROW BRAT25 in its present position. To maintain this significant and historic PROW will encroach onto the available land and not permit 40 dwellings as per the outline plan. Important note: site 321, is on approx. 2/3rds of Title WT293213. The western boundary of site 321 was created in the 1990's shortly after Planning refusal of earlier applications. It has no significant or historical basis other than subdividing the Title. Further land to the west is theoretically available.</p> <p>Of significance, any approved development could 'shift' westwards a few meters to maintain the PROW BRAT25 in its current form. It should also be noted that any residual land within Title WT293213 is likely to receive a further development request in the future, extending the Bratton boundary further west.</p> <p>Phrasing the 'improvement' of BRAT24 and BRAT25 through the development leads to an opening for diversion to within the development. The wording should maintain that BRAT24 and BRAT25 remain in their present physical alignment.</p> <p>The proposed density (of up to 40 dwellings) is not conducive to accommodating PROW BRAT25 in its present position. To maintain this significant and historic PROW will encroach onto the available land and not permit 40 dwellings as per the outline plan. Important note: site 321, is on approx. 2/3rds of Title WT293213. The western boundary of site 321 was created in the 1990's shortly after Planning refusal of earlier applications. It has no significant or historical basis other than subdividing the Title. Further land to the west is theoretically available.</p> <p>Of significance, any approved development could 'shift' westwards a few meters to maintain the PROW BRAT25 in its current form. It should also be noted that any residual land within Title WT293213 is likely to receive a further development request in the future, extending the Bratton boundary further west.</p> <p>Phrasing the 'improvement' of BRAT24 and BRAT25 through the development leads to an opening for diversion to within the development. The wording should maintain that BRAT24 and BRAT25 remain in their present physical alignment.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	941	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a resident adjacent to Site 321 I am disappointed not to have received formal notification from Wiltshire Council that the Consultation process between 14 July 2017 and 22 September 2017 was underway. I suspect there are many residents living adjacent to this potential site who are unaware of this process. Suspend the consultation deadline and formally notify all adjacent households of the process underway.</p> <p>As a resident adjacent to Site 321 I am disappointed not to have received formal notification from Wiltshire Council that the Consultation process between 14 July 2017 and 22 September 2017 was underway. I suspect there are many residents living adjacent to this potential site who are unaware of this process. Suspend the consultation deadline and formally notify all adjacent households of the process underway.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	942	Consultee Mrs Jane Keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125371		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Bird and animal species will be denied an ecological niche which has been in existence for a documented 100+ years. Access to the potential site cannot be through the Important and protected hedgerow.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	943	Consultee mrs Jane Keltie	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125371	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Extremely rare post-medieval earthworks will be destroyed (earthworks which have already suffered damage from ill-informed exploratory work). The field system and managed landscape associated with a grade two listed building will be destroyed. Access can only be from the A361 directly past the grade two star listed building.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	944	Consultee Mrs Jane Keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125371		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consistent with national policy				
Attached files (Please see Objective)	The field system and managed landscape associated with a grade two listed building will be destroyed. Public access to land which has been used as a public resource with the support of the landowner and on which residents have had their ashes scattered for a minimum of 40 years will be removed. Short and medium term economic impacts will render the entire managed field system derelict.				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	945	Consultee Mrs Jane Keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125371		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Poorly informed exploratory work will inevitably lead to erroneous data in support of the application.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	946	Consultee Mrs Jane Keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125371		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Location in relation to the current built form will create unacceptable peril for existing and incoming residents. Public services and access to significant public transport hubs are out of specified range of this development. Traffic and education will be specifically impacted.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	947	Consultee Mrs Jane Keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125371		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>There is no active support for this site from either, Local Council, Environment Agency, Natural England, Historic England or the County Planning Archaeologist despite such active support being voiced for other sites within the Proposal. In fact in a response from Natural England the case officer said :</p> <p>“I have briefly looked at the conclusions/recommendations in the Trowbridge Community Area Topic Paper and have noted that Site 3565 (Land east of the A361 at Southwick Court), is considered to be a less sustainable options for development, and that five moderate adverse effects have been identified in relation to this site.”</p> <p>As NPPF demands:</p> <p>“If a planning application fails to score positively against the aims and objectives of the Local Plan Sustainability Appraisal or Local Plan policies..... planning permission should be refused.”</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	948	Consultee Mrs Jane Keltie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125371		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Southwick Court Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Procedural anomalies relating to the process itself are rife. The indications being that this parcel of land has been added in a rushed manner to the Proposal without due diligence on its suitability having been performed. Furthermore all attempts to activate the commitments made by Councillors by County Officers have been met with negativity and inaction.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	949	Consultee Mr. Paul Cunningham Person ID: 862429	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Netherhampton Road, Salisbury			Effective	
			Consistent with national policy		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Further to our previous comments. The residents of Harnham and Netherhampton organised a drive-by protest on Tuesday 19th September to raise awareness of the infrastructure impact of the proposed housing allocations in Harnham and Netherhampton. Our contention is stronger than ever that the implications for transport and other infrastructure need careful consideration and a clear plan put in place BEFORE any housing allocations are made in this area. Tuesday's protest saw roughly 20 cars more than double the usual time to drive from Wilton to Harnham. We didn't drive especially slowly and yet those few cars which, according to TRICS data, represent less than 10% of the daily journeys that would be generated by the proposed housing allocations, created huge delays. In other words, the proposed housing allocations would mean delays that are ten times greater every day without some brave and joined up thinking by Wiltshire Council. It is already acknowledged that Wilton Lights and Harnham Gyratory are operating over capacity. We believe that Wiltshire Council should agree to remove the allocations in Harnham and Netherhampton from their draft plan until such time as a coherent and comprehensive transport strategy for Salisbury has been consulted on and formally adopted. We believe that this morning's protest will have caused many people to realise that the impact of these housing allocations without sane infrastructure provisions will be devastating for all who live and work in Salisbury. We sincerely hope that Wiltshire Council will take notice of our concerns.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am Chair of Netherhampton Parish Council				

Comment ID:	950	Consultee Arno Pilz Person ID: 1126612	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.59				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Request for Settlement Boundary amendment at East Marsh Farm, 29 Lower Road, Bratton BA13 4RG BACKGROUND INFORMATION 1.0 Existing Village Boundary for Bratton, Wilts is shown in blue border on Map 1. New proposed village boundary in current consultation is shown in red border on Map 1. Source: http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/planningpolicydocuments.htm?directory=Wiltshire%20Housing%20Site%20Allocations%20DPD/Pre-Submission%20Consultation%20July%202017/Settlement%20Boundary%20Maps 2.0 East Marsh Farm is currently owned by Mr and Mrs Pilz. The property has been split into three sections for the purpose of this application. Map 3 shows in green border all three sections. 2.1 Section 1 comprises of Grade II listed East Marsh Farm, a garage, old barn, small outbuilding and mature garden. 2.2 Section 2 comprises of woodlands 2.3 Section 3 comprises of a paddock. 3.0 Google map coordinates at: https://www.google.co.uk/maps/place/Bratton/@51.2740577,-2.1235706,487m/data=!3m1!1e3!4m5!3m4!1s0x4873d710d3b2c945:0x59775b62d220d7fd!8m2!3d51.270719!4d-2.125232 REQUESTED AMENDMENT 4.0 Changes to the proposed village boundary are shown on Map 2 in yellow border. This shows an enlarged map of the north easterly corner of Bratton. The proposed amendment affects only Section 1, East Marsh Farm, and should be fully inside the proposed village boundary. RATIONALE FOR AMENDMENT 5.0 Section 1 comprises of East Marsh Farm which belongs to a set of old historic houses in Bratton, hence its grade II listing. The village border should follow the historic outline of this old farmhouse and its mature garden and avoid splitting the garden from the house, they are one unit. New and Old ordnance survey maps document the clear and historic border of East Marsh Farm and its buildings and garden. Other properties in Bratton's set of old historic houses have their historic borders inclusive of garden respected. Examples are:				

	<p>5.1 Yew Tree Farm and the Old Courthouse both have their historic garden now included in the proposed boundary. Map 1 marked C.</p> <p>5.2 Map 4 shows an old ordnance survey map of 1887 clearly showing the historic border of East Marsh Farm.</p> <p>6.0 Westward to section 1 is a plot that had planning permission which subsequently elapsed when Lord Twiss, the previous owner, built a Tennis Court on it.</p> <p>6.1 Since Mr Pilz's purchase of the property in 2004 the tennis court has not been used and eroded into an unusable overgrown state with plans for its eventual removal. The tennis court is far beyond repair, use and fully decommissioned (inspection welcome).</p> <p>6.2 The plot is well integrated into the residential area of neighbouring bungalows.</p> <p>6.3 It does not primarily form part of the countryside like section 3 or 4 does.</p> <p>The proposed new village boundary (Map 1, red border) shows other boundary properties that had split plots and now made whole by enlargement. This is shown as hashed lines on Map 1.</p> <p>Examples are:</p> <p>6.4 numerous bungalows marked A on Map 1.</p> <p>6.5 recently build houses with extended gardens, marked B on Map 1,</p> <p>6.6 historic buildings with mature gardens combined, marked C on Map 1</p> <p>These expansions make sense as they constitute the natural growth of a village over time.</p> <p>7.0 Section 3 and Section 4 are rightly outside the boundary and constitute part of the countryside.</p> <p>AMENDED VILLAGE BOUNDARY</p> <p>8.0 Changes to the proposed village boundary (Map 2, yellow border) comply with the same rules and rationale that allows other similar bordering properties to have their plot combined and avoid splitting. Historic properties have been made whole in the proposed boundary changes so East Marsh Farm should be treated the same.</p>
<p>Attached files (Please see Objective)</p>	<p>4711834 / 4711831 / 4711832 / 4711833</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	951	Consultee Mrs Maria Pennington Clerk	Agent	Do you consider the draft WHSAP is legally compliant?	
		Whiteparish Parish Council	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.6 Whiteparish SB			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<i>A.6 The preceding map of Whiteparish illustrates both the existing settlement boundary and the proposed revised settlement boundary. Table A.6 below explains why each of the proposed amendments were made to the existing settlement boundary, in line with the settlement boundary review methodology(19) . The grid reference numbers are those used on the map overleaf.</i>				
	Table A.6 Proposed amendments to Whiteparish Settlement Boundary				
	Map Grid Reference(20)	Proposed Amendments			
	F8 E7, F7	Amend boundary to include built residential development that is physically related to the settlement. Smaller section is agricultural buildings and should be excluded.			
	H7 H7(W)	Amend boundary to include the curtilage of a property that relates more to the built environment. Thin strip at rear of properties on Common Road should be excluded - area of land more closely related to the open countryside.			
	H7 H7(E)	Amend boundary to include the curtilage of a property that relates more to the built environment. You have excluded a property Church Barn – should be included.			
	G9	Amend boundary to include the curtilage of a properties that relate more to the built environment. Both rectangular and square sections are agricultural and should be excluded as pushing out into the open countryside which is the New Forest National Park.			
I4, I5	Amend boundary to exclude recreational or amenity space at the edge of the settlement that relates more to the open countryside. WC comments say to exclude but 2 large (I5 rear of 4 large houses on Dean Lane) sections are proposed to become included when they should be excluded. Curtilages of properties which have the capacity to extend the built form of				

		the settlement. This includes large residential gardens. Recreational or amenity space at the edge of settlements which primarily relate to the countryside (in form or nature).
	H4, H5	Amend boundary to include built residential development that is physically related to the settlement. Ashmore House, Dean Lane is a large country house set in grounds and should be excluded. Curtilages of properties which have the capacity to extend the built form of the settlement. This includes large residential gardens. Further development around the house would be detrimental to the setting.
Attached files (Please see Objective)	4711828	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		

Comment ID:	952	Consultee Mrs E Weatherley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446834		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We find it unbelievable that the Council could consider building seven hundred and forty homes at Harnham & Netherhampton. There is no infrastructure for such a development & no space to put any. It would destroy the area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	953	Consultee Ms C Mayall Southern Water	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126553	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Policy H1.1 Land at Empress Way		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are unable to support this policy as sound on the grounds that:</p> <p>1) it is not effective as it does not support delivery of necessary infrastructure, and</p> <p>2) it is not consistent with national policy.</p> <p>This site falls within Southern Water’s wastewater supply area.</p> <p>Southern Water has no objection in principle to the allocation of the site for development. However, a capacity check carried out in accordance with paragraph 162 of the National Planning Policy Framework (NPPF) has shown that the existing capacity of the local sewerage network is insufficient to meet the anticipated demand. This is not a constraint to development however, provided planning policy for this site ensures that proposed development makes a connection to the sewerage network at the nearest point of adequate capacity.</p> <p>If development is permitted to proceed without such policy provision where there is inadequate capacity in the sewerage network, Southern Water has limited powers to prevent connection and the system could become overloaded, leading to pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.</p> <p>Furthermore, there could be a risk that the necessary local sewerage infrastructure will not be delivered in time to service the proposed development, unless delivery is supported by planning policies and subsequently in planning conditions. This is supported by the core planning principles identified in the NPPF, notably to: ‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs’ and ensure that plans ‘provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency’ . Our approach is also supported by paragraph 21 of the NPPF, which requires that planning policies should recognise and seek to address any lack of infrastructure. The National Planning Practice Guidance specifies that ‘Adequate water and wastewater infrastructure is needed to support sustainable development’.</p> <p>In addition, we note that the site is approximately 300m from Ludgershall Wastewater Treatment Works (WTW), which is owned and operated by Southern Water.</p> <p>Southern Water endeavours to operate its sewage and sludge treatment works efficiently and in accordance with best practice to prevent pollution. However, unpleasant odours inevitably arise as a result of the treatment processes that occur. New development must be adequately separated from WTWs to safeguard the amenity of future occupiers.</p> <p>Southern Water believe that development that is sensitive to odour should only be permitted if the distance to the works is sufficient to allow adequate odour dispersion. We would expect an assessment to be carried out that would demonstrate that there would not be a detrimental impact on amenity by reason of odour. This is supported by paragraph 120 of the NPPF which states ‘To prevent unacceptable risks from pollution [...], planning policies and decisions should ensure that new development is appropriate to its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account’). Annex 2 of the NPPF establishes that pollution includes odour and noise.</p>				

	<p>To ensure consistency with the NPPF and Planning Practice Guidance, we propose the following text (new text underlined) are added to the end of Policy H1.1:</p> <p>Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.</p> <p>Development will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.</p> <p>Development layout should be informed by an odour assessment, to be undertaken in consultation with Southern Water.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	954	Consultee Mrs Jo Wilkins Policy Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		South Somerset District Council Person ID: 976774		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		The Plan			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I confirm that I have no issues to raise regarding the Pre-submission draft Wiltshire Housing Sites Allocations Plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	955	Consultee Mr Paul Doman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126671	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Feeling a bit like David and Goliath situation but perhaps with the strong support of the village residents we can at least try and make Wiltshire Council think again and appreciate what they will be destroying.</p> <p>Wiltshire Council have thrown everything at us- Unacceptable volumes of traffic / road routing (If there was legislation regards traffic noise and traffic pollution I feel sure this area would exceed acceptable levels)</p> <p>Solar farms</p> <p>Encouraging huge industrial and residential developments in close proximity to these villages further exacerbating an already bad situation</p> <p>Wiltshire Council may consider this an area that can be sacrificed to meet their targets but the people do not. I do appreciate that there will no doubt be a few disappointed developers but hopefully there were no guarantees!!</p> <p>Please leave the green space between North Bradley, Southwick and Trowbridge. It is this land that defines what we are. It is criss crossed with centuries old footpaths and bridleways that have always connected these communities and now offers local access to the natural countryside and wonderful walking for the residents of today. Perhaps the same concern could be shown for the habitat of human beings as there is to that of bats! (£4M tunnel)</p> <p>Please do not destroy the villages that make up the very fabric of this county.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	956	Consultee Mr Jeremy Retford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126672		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Site Allocations Plan allocates a total of 50 houses to Ridgeway Farm Crudwell; the current 10 under construction and a further 40. I wish to register my objection to this. The reasons for that objection can be grouped under two main headings.</p> <p>Strategic need</p> <p>The plan notes that housing sites will only be allocated by Wiltshire Council where there is a strategic priority to do so. While I appreciate that Wiltshire Council needs to ensure an adequate five year housing land supply across each housing market area, the Site Allocations Plan would result in an oversupply of 4,284 dwellings to year 2026 when past completions are combined with deliverable commitments, and windfall sites are included. Even when windfalls are excluded, the oversupply is still 2,198 dwellings across the Housing Market Area. The Site Allocations Plan also results in an oversupply of homes in the Malmesbury Community Area, even without windfalls. On this basis, there seems to me to be no strategic need to identify any new homes at Crudwell, so the Wiltshire Site Allocations Plan should not do so.</p> <p>Wiltshire's Core Strategy identifies Crudwell as a large village. Policy 1 of the Core Strategy notes that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." It is hard to see how more houses will help the village in these ways, as it has little or no organic employment opportunities and little basic supporting infrastructure. More houses will only add to the current "dormitory" feel of the place and to the already heavy morning traffic that takes people to work elsewhere, as well as loading further the existing infrastructure.</p> <p>Practical constraints and problems associated with the site</p> <p>A planning application for the development of some 29 houses on Ridgeway Farm was submitted to Wiltshire Council in 2014. That application drew much local opposition, principally on the grounds of the scale of the development, and its likely impact on Crudwell's infrastructure. Specifically: the likely increased traffic on Tetbury Lane; impacts on already overburdened drainage and sewerage systems and oversubscription to Crudwell Primary School. That plan was withdrawn, and a revised plan for a reduced development of 10 houses was submitted and approved (subject to a number of conditions). All the issues and concerns relating to the original proposal for 29 houses remain and a further 21 houses clearly exacerbates them. To expand further on key points:-</p> <p>If the allocation in the Strategic Plan remains at 50 houses, I believe that number is sufficiently large to materially harm the village in ways such as those outlined above, but not large enough to attract the funding necessary to mitigate that harm properly.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	957	Consultee Mr John Bristow Person ID: 1125693	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Figure 5.18 Court Orchard / Cassways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is not justified owing to the inconsistency with the evidence base that is still relevant as set out in the Core Strategy.</p> <p>It is not consistent with national policy because it conflicts with the sustainable requirements of the NPPF and the protection of landscape. Proposed allocation H2.14</p> <p>It is surprising this greenfield site has been suggested by Wiltshire Council as appropriate given it is contrary to its own policies and does not conform with the NPPF in terms of sustainable development.</p> <p>The Wiltshire Core Strategy (2015) advises on page 440 that Policy C3 Special Landscape Areas is a saved policy from the West Wiltshire District Plan. The proposed site is within the C3 Special Landscape Area as defined in the interactive Proposals Map. Policy C3 states: Special Landscape Areas C3</p> <p>The landscape character of Special Landscape Areas will be conserved and enhanced and development will not be permitted which is considered to be detrimental to the high quality of these landscapes.</p> <p>Proposals for development essential to the social and economic well-being of the rural community or desirable for the enjoyment of its amenities will be permitted having regard to highways, access, scale, design, materials, location, siting, landscaping and other appropriate environmental considerations.</p> <p>The proposed development of an additional 40 estate houses on the edge of the village within this open landscape is considered detrimental and contrary to this saved policy. In addition it does not satisfy the high test of "essential" to the social and economic well-being of the rural community.</p> <p>The Core Strategy also directly mentions edge of town and village sites stating: Development on the edges of towns and villages will be broadly controlled in line with Core Policy 3 (Delivery Strategy). At paragraph 4.35: it acknowledges: The impact of development on local communities and the fabric of the existing built and natural environment is an important consideration. The Core strategy discusses paragraphs 115 and 116 of the NPPF and paragraph 14 (including footnote 9), which restricts the presumption in favour of sustainable development in certain areas. This site is not in such an identified area but at paragraph 6.82 the Core Strategy recognises the importance of adjacent high quality landscapes: However, Core Policy 51 also addresses development outside these areas which could affect the setting of these highly valued landscapes. Clearly then Core Policy 51 is also relevant in this case not least owing to the designation of the area as SLA C3. Core Policy 51 - Landscape Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, ...Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies.</p>				

As the development would be proposed within a defined Special Landscape Area it seems impossible to argue to would not have a harmful impact. Indeed the proposed mitigation within paragraph 5.119 which suggests “Additional screening at the site boundaries would be required” alludes to the fact that the development should not be visible but without screening it will be. For clarity it should be realised that it is not possible to screen away an inappropriate development within the landscape it is harming, it still remains within the landscape and it still causes harm to it and depletes it in size and quality. Screening is an admission of failure to safeguard and protect important landscapes. The safeguarded policy C3 stems from an evidence base document the West Wiltshire District Landscape Character Assessment which again is referred to in the adopted Core Strategy (paragraph 6.80). This Assessment identifies the proposed site within landscape character area G1. This is a linear landscape immediately adjacent to G2 and in the foreground of H1 the Chalk Downland Edge and I1 Salisbury Plain. The key Section of the Assessment in this regard is Section 4.0 – The Landscape Character of West Wiltshire. The Management and Strategy Objectives for G1 (Bratton and Eddington Chalk Terrace) include:

The overall strategy for the area is to conserve the generally intact landscape and settlement pattern, with small villages nestling at the bottom of the Chalk Downland and also to enhance/ repair the existing hedgerow network using species that reflect local landscape character. Specific management objectives are to:

- Seek to resist any development that would affect the open views across the terrace to the chalk uplands
- Conserve and enhance the current field pattern and hedgerows with careful management and restoration (where necessary) with species appropriate to local landscape character
- Conserve the existing small-scale settlement pattern and avoid larger developments that would be out of scale and character within the existing situation

The Inherent Landscape Sensitivities for the area G2 (Westbury Greensand and Chalk Terrace) in which the proposal site lies are listed as:

- Surviving hedgerow network
- Open views to dramatic Chalk Downland Edge
- Open views to Westbury White Horse as a dramatic landscape feature
- Rural character of series of minor roads connecting settlements-
- Strong sense of tranquillity throughout the character area.

Clearly development of this site within that landscape is at odds with the identified sensitivities of tranquillity and open views. The overall Management Strategy for G2 is stated as:

The overall strategy for the area is to conserve the existing landscape pattern and dramatic open views to the adjacent Chalk Downland Edge and enhance the landscape setting of Westbury.

Again development of this site, in this identified area is contrary to this. The Specific Management Objectives for G2 are listed (see below) as the first could not be plainer in terms of resistance of any development:

- Seek to resist any development that would affect the open views across the terrace to the chalk uplands
- Conserve open views to the Westbury White Horse as a distinctive landmark
- Conserve and enhance the current field pattern and hedgerows with careful management and restoration (where necessary) with species appropriate to local landscape character
- Conserve the existing sparse settlement pattern and avoid larger developments that would be out of scale and character within the existing situation

Finally within this Assessment the landscape Character of adjacent area H1 (Bratton Chalk Downland Edge) states in the Management Strategy and Objectives:

The overall strategy of the area is to conserve the intact landscape pattern and open nature of the Chalk Downland edge, ...

The Specific Management Objectives are to:

- Conserve and manage blocks and strips of woodland on the scarp slopes and limit further woodland planting within this area to maintain the generally open character of the scarps...
- Maintain the generally undeveloped, rural character of the area
- Maintain open, panoramic views from the scarp, across adjacent lowland landscapes.

	<p>The proposal therefore to develop in this adjacent lowland landscape also has a potential detrimental impact on this important Chalkland Edge landscape. In addition the proposal to then “screen” the offending development with tree planting shows a lack of understanding of the landscapes in this area and is in direct conflict with the Management Objective of the adjacent H1 which seeks to limit further woodland planting within this area.</p> <p>The Wiltshire Landscape Character Assessment 2005 also notes: “Conserve the open character of the terrace and retain the concentrated character of the settlement by resisting linear growth along transport routes” This is precisely the type of development that is now being advocated by the Council.</p> <p>In allocating this greenfield site, has there been any assessment of the potential visual and landscape impact of the resultant development? This is surely essential to address the listed policy conflicts in relation to the special landscape area identified and afforded protection by the Core Strategy and NPPF.</p> <p>Proposing to develop in this protected area, on greenfield land before the brownfield sites put forward by the Parish, outside the already increased and revised settlement boundary (2015), in an area identified as a special landscape is unacceptable and unsustainable. Remove the proposed allocation that is outside the village boundary as re-defined by Wiltshire Council in 2015, that is on greenfield land, that is within an area of protected landscape (SLA), on the edge of the Chalk downland. Instead consider alternative brownfield sites within the village envelope closer to local amenities (school, Dr, shops). This would protect the landscape and score higher in sustainability criteria measurements.</p> <p>Has there been an assessment of the potential impact of developing this site such as views, landscape character impact assessment, ecological impacts and traffic assessments? And if so has, this been contrasted and weighed against the development of other more sustainable sites within the village?</p> <p>There is genuine concern locally about the road and the number of accidents that have already occurred. Encouraging additional traffic movements here and introducing another access may necessitate a highway engineered solution that further harms and causes deterioration to the protected landscape, blighting the entrance to the village. There may also be impacts to the other roads in the village as yet unthought of and again such interventions may be harmful to the village character.</p> <p>How has the number of potential units been arrived at? and how does this compare to the existing density and urban form of the village?</p> <p>Any harm must be mitigated by the greater public benefit. What is the overall impact vs public benefit analysis?</p> <p>Many thanks for your consideration.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	958	Consultee Mr Jeremy Edwards	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126683		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Transport along Harnham Road heading towards Salisbury, to the roundabout where New Bridge Road starts is already too congested. Many cars use a rat run over St Nicholas' Rd. I live on Harnham Road near the Rose & Crown and have had my car & my visitors cars scratched when too many cars use this rat run. Building more houses without improving the roads from Harnham Road onto the New Bridge Road adds to an already bad situation. Bad traffic jams are also bad for the environment, especially in winter as cars inch forward emitting exhaust gasses. In summary, more houses on Netherhampton Road just makes a bad, existing problem worse.</p> <p>Come up with a proposal to ease road traffic congestion along Harnham Road into Salisbury along New Bridge Road. Carry out that road improvement work in full then return with a plan to build houses according to the new, proven excess road capacity of the new road system. As far as I can see, such a road improvement plan does not exist. So, as Wiltshire has been ordered to build houses, spread smaller numbers of houses across villages nearby Salisbury instead, supporting village shops, schools and pubs.</p> <p>Improve the local road system to add car capacity before considering building any houses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	959	Consultee Councillor Ernie Clark	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 840630	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way, Hilperton.		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>You have ignored Planning Examination findings the basis for which have not changed relating to sites 263 and 297. Over ten years ago the Planning Inspector determined, in relation to the Hilperton Gap, in his West Wiltshire District Plan First Alteration Inspector's Report:-</p> <p>"2.2.47. This area so contained comprises a series of small fields, separated by hedges, and crossed by a number of public and other footpaths. From my visits to this locality I consider that at present this area appears as a reasonably homogenous tract of open land, although there are subtle differences in landscape character within it. It is partly in agricultural use and partly consists of unused grassland, but there are views of Hilperton and the edge of Trowbridge from within and across it. I consider that the properties in Wyke Road, Victoria Road and Albert Road form an obvious definition to the eastern edge of Trowbridge hereabouts...</p> <p>2.2.48. I appreciate that the proposed Hilperton Relief Road is intended to cross this land [the Gap] broadly from north-west to south-east. Although the precise alignment of the road is not formally before me, a draft scheme has been drawn up and was presented to the inquiry. From this and my own observations, I cannot imagine that substantial earthworks would be needed to accommodate the road, wherever its precise route lay, so that its impact in the landscape might not be great. In these circumstances I do not believe that it would, if built here, appear as a more convincing boundary to the town than the existing development...</p> <p>2.2.49. An alternative boundary to the town policy limit further to the east would enable development to take place on the land so enclosed. This would extend Trowbridge into open land having a reasonably pleasant appearance and would in my opinion harm the semi-rural character and appearance of the area as open fields were replaced by built development of one form or another. It would also erode the gap between Trowbridge and Hilperton..."</p> <p>You have made unrealistic and unsubstantiated assumptions on building density for sites 263 and 297.</p> <p>You have proposed sites 263 and 297 for housing stating that these would provide 205 dwellings after numerous mitigation measures. These sites have a combined area of approx. 20.5 ha and thus provide a net housing density of only 10 dwellings per hectare.</p> <p>This is only about one third of typical modern development density and indicates a highly wasteful use of precious green field space.</p> <p>A speculative developer has applied to develop houses on the northern part of site 263, an area of about 8.5ha partially in a flood zone. After over 18 months of negotiation with WC they are now asking for approval for 170 dwellings. This is a density of 20 dwellings per hectare which would provide, were it to be approved, 80% of the dwellings expected of site 263 on 40% (and the most difficult part) of the site.</p>				

	<p>WC owns site 297 and has claimed (in Wiltshire SHLAA Appendix 3 for Trowbridge community area) that it alone could accommodate 74 dwellings.</p> <p>Your calculations are clearly unsound. Either only about one third of these sites is needed to provide the 205 dwellings you claim is required, or you have deliberately underestimated the number that will be built in an obvious attempt to assuage fierce local opposition to development in the Gap. This later argument can be sustained by the objection to the HSAP from Barratt Developments arguing that less mitigation but more housing should be allowed.</p> <p>You have failed to comply with your own Core Strategy. Section 5.150 recognises that the village of Hilperton has a separate and distinct identity compared to Trowbridge and that open countryside should be maintained between the two to protect Hilperton's character and identity as a separate community. Allocating sites 263 and 297 for housing singularly fails to do this - quite the opposite in fact.</p> <p>You have failed at any time to consult with the Hilperton Neighbourhood Plan Steering Group regarding sites 263 and 297.</p> <p>Your methodology is inadequate and you have failed in your 'Duty to Cooperate' as enshrined in the Localism Act 2011. The duty to cooperate requires additional consultation beyond existing statutory consultees. "The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process". (Paragraph: 009 Reference ID: 9-009-20140306. Revision date: 06 03 2014.) Sites 263 and 297 should be deleted as housing allocation sites. This will comply with your own Core Strategy and the other objections to the soundness of the HSAP made above.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>As the duly elected representative of the residents of Hilperton Division I feel it important that the opinion of 'the man on the Clapham omnibus' is heard and understood amongst the inevitable representations of planning lawyers, QCs, and planning agents.</p>

Comment ID:	960	Consultee mrs victoria slater	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126692		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Netherhampton Village has 60 dwellings so the proposal for a further 740 houses is totally and completely out of proportion.</p> <p>The road (3094) plus the Harnham gyratory and the Wilton Wall lights are already operating at full capacity. A development of this size would cause traffic chaos in this and surrounding areas.</p> <p>This road is already massively busy as everyone who lives in it or travels down it can tell you.</p> <p>None of these issues have been addressed in this proposal.</p> <p>Netherhampton Road cannot cope with the increase of people, cars, houses, there are no facilities and adding them would even further increase traffic.</p> <p>Unless the above issues (in particular the matter of local roads) are fully addressed this proposal should not go ahead.</p> <p>The traffic in Netherhampton Road is already overwhelming, we cannot cope with anymore.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	961	Consultee Mr Maurice Turner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126678	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a resident opposite to site 321 I was disappointed not have been formally notified by Wiltshire council that the consultation process was underway and due to close on 22 September 2017.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	962	Consultee Mrs Helen Norcott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126215		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 court orchard / castaway, Bratton figure 5.18		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The site is inappropriate for the allocation of 40 dwellings as previously smaller developments have already been rejected on this site. The site has a high potential for flooding from surface water and would have a negative effect on surrounding properties that rely on the current site to act as a flood barrier. The properties behind the site will have an increased flood risk leading to subsidence and damage to dwellings. Any development on this site will be higher than houses on Rosenheim rise, thus blocking out sunlight and having the potential of a sight line into bedrooms. Current services and amenities would be stretched offering no benefit to current resident or new . Other sites within the village boundaries need to be explored, and the size of any development be relevant to the needs of the village.			
Attached files (Please see Objective)		4711925			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	963	Consultee Mr Maurice Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126678		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a resident opposite Site 321 I was disappointed that we were not notified formally by Wiltshire Council that the consultation process had started and due to end on 22nd September 2017, I would suspect that many residents feel the same way and may still be unaware of the process. The application should be refused, the housing is not required or supportable. Wildlife will be endangered by the development by destroying its habitat, providing token tree planting etc is not an effective solution to destroying it in the first place.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	964	Consultee Mr Christopher Demmery	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126711		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is well known that the fields behind Church Lane and Oldbrick Fields/Spring Meadows provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds, all of which I have seen for myself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	965	Consultee Mrs Veronica Quarm	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126730		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Its in Netherhampton!</p> <p>As an elderly ex-resident of Harnham I am writing to protest against the proposed development above. My concern is the impact on the infrastructure, services and amenities to the residents' of Harnham. In the late 1960's, 70's the Harnham Road, a minor road, was upgraded and became the outer ring road for southern Salisbury. This worked for many years although heavy traffic immediately increased and has continued to do so. Car and lorry fumes were a constant worry then, even more now. New building is not going to help. Harnham at present just copes. To take the north side of the Harnham Road for building of any sort would be nothing short of tragic, please leave it to agriculture, water meadows and an unspoilt view of the cathedral. Before long, but I pray not in my lifetime, all the outskirts of Salisbury will be built up and lovely Salisbury and outskirts will have been irretrievably lost forever. We cannot take more houses in Harnham and it would be criminal to even consider moving Churchfields Industrial site to what is a rural residential area. Enough is enough! Where is the green belt? I trust and hope that my comments will be taken into consideration with all the objections of those who attended a meeting at St George's Hall recently. Put 100 Houses where Bookers was, plus some behind Britford Park and Ride. The rest and the reallocation of Churchfields needs to go nearer the A303.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	966	Consultee Es Davis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126718		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Table 4.11 South Wiltshire HMA - Distribution of housing development 2006-2026			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The table states that the requirement for housing in Salisbury and Wilton is 6060 and yet the proposal will mean that 10% extra houses are going to be built. That's 600 houses more than is needed, so why build an extra 840 houses in the Harnham area?</p> <p>Do not add to Rowbarrow development and reduce the building in the Harnham area to 300 houses in just the Netherhampton Road proposed site and there will still be more than required.</p> <p>What consideration has been made to the infrastructure and the amount of traffic already in the area? Furthermore what consideration has been made to air quality particularly around Harnham junction and Odstock Road which is already clearly unacceptable.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	967	Consultee Mr Peter Fielding Person ID: 1054315	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way (This land is in Hilperton, Not Trowbridge as stated)		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The whole basis of allocating additional building land in the Trowbridge area is based on unrealistic assessment of how much additional housing should be provided related to the prospects of providing employment in the local area. If there is a need for such a large increase it can only be justified on the basis of making this part of West Wiltshire a dormitory for other employment areas in the large conurbations such as Bath, Bristol and Swindon. In such a case it is hardly critical that the housing has to be provided in such a way as to expand Trowbridge into the surrounding villages effectively destroying their separate identity. There are more sufficient brownfield sites with Trowbridge itself to provide housing for any realistic local growth in demand or for those who need to be within easy reach of local services. Therefore the majority of occupants of housing on the scale proposed are likely to be newcomers to the area attracted by lower prices than found closer to the main centres of employment who will expect to have to travel some distance to their place of work. The exact location of the housing is unlikely to be that critical and there are other less contentious locations which would provide equally suitable housing land to complement the nearby villages rather than threaten their identity and remove precious green space providing landscape setting and recreational facility. Of far more importance to any substantial increase in the population of the Trowbridge community area would be better transport links. The local roads are already gridlocked at commuting time yet the plan provides for no significant improvements especially with regard to accessing Bath via Staverton.</p> <p>The above arguments apply to a number of the sites allocated in the Plan. However, as a resident of Hilperton my primary concern is of course Allocation H2.3, the whole of the area west of Elizabeth Way. Paragraph 5.150 of the Wiltshire Core Strategy states:</p> <p style="text-align: center;"><i>‘It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.’</i></p> <p>This suggestion was taken at face value by the Hilperton Neighbourhood Development Plan steering group (of which I am a member) and consolidating the position of the gap was one of its major policies fully supported by the majority of the residents. At a stroke and without any prior consultation or warning from Wiltshire Council officers a large proportion of the gap has been allocated in the HSAP which was issued shortly after the Hilperton NDP completed its Regulation 14 consultation period. However, the HSAP recognises that building houses on this land requires extensive mitigation both for wildlife and for any occupants of the new houses to the extent that it proposes a maximum of 205 houses across the whole site. It would be a travesty to build on this piece of open countryside in any event but especially so if it can only support 205 houses. If there really is a desperate need for a further 205 houses in the Trowbridge Community area then there are other better places to build them even within Hilperton itself without the same effect on the landscape and setting of Hilperton. Such development could well then benefit rather than threaten the village by improving public transport, schooling and infrastructure.</p>				

	I would respectfully suggest that allocation H2.3 be deleted from the plan and that the land retains its green belt status pending some longer term protection.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	968	Consultee Mr Christopher Hart	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126230		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111), SA objective 2, SA objective 7, SA objective 10, SA objective 11,		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SA objective 10. Reduce the need to travel and promote more sustainable transport choices</p> <p>The Harnham Road is already at maximum capacity and without the prospect of widening this development will make it intolerable for locals. At present in rush hour and at peak times of traffic through put, the Harnham Gyratory rapidly becomes gridlocked with vehicle backed-up along the Netherhampton and Coombe Bissett Roads. The roads cannot sustain an increase in what could be up to 1500 additional vehicles using this road.</p> <p>Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads.</p> <p>I do not believe this is a viable plan and will adversely affect traffic and air quality (increased pollution) in the area which is not acceptable to local residents.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	969	Consultee Mr Christopher Hart	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126230		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111), SA objective 2, SA objective 7, SA objective 10, SA objective 11,		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SA objective 10. Reduce the need to travel and promote more sustainable transport choices</p> <p>The Harnham Road is already at maximum capacity and without the prospect of widening this development will make it intolerable for locals. At present in rush hour and at peak times of traffic through put, the Harnham Gyratory rapidly becomes gridlocked with vehicle backed-up along the Netherhampton and Coombe Bissett Roads. The roads cannot sustain an increase in what could be up to 1500 additional vehicles using this road.</p> <p>Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads.</p> <p>I do not believe this is a viable plan and will adversely affect traffic and air quality (increased pollution) in the area which is not acceptable to local residents.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	970	Consultee Mrs Kate Hayes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126736	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This DPD is unsound for the following reasons</p> <p>1. Trowbridge is being asked to take unfair allocation of development Other market towns are willing to take more development</p> <p>2. You have failed to allocate brownfield site within Trowbridge namely The old West Wiltshire District Council Office Bowyer site near Trowbridge station Ashton Street Centre Land at East wing/Trowbridge hospital/Margaret Stancombe School</p> <p>3. You have failed to allocate the following sites 256 land south of Green Lane 292 land North of Green Lane 3247 Biss Farm All these sites are natural extensions to Trowbridge</p> <p>4. Open spaces between villages surrounding Trowbridge allows villages to keep their identity & should not be developed In fact the planning inspector said 10 years ago of land known as the Hilperton Gap separating Hilperton from Trowbridge that development of this land would harm the semi-rural & character of the area Allocate brownfield sites at the old Wiltshire District Council offices, Bowyers site near Trowbridge Station, Ashton Street Centre, land around Trowbridge Hospital & Margaret Stancombe School. Allocate site 256 south of Green Lane, site 292 north of Green Lane, site 3247 Biss Farm. Allocate sites away from Trowbridge to other market towns</p> <p>This will alleviate the need to development land that acts as a buffer between the villages surrounding Trowbridge & Trowbridge town so that the villages keep their individual identities</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure my comments are taken into account				

Comment ID:	971	Consultee mrs june platts Person ID: 1126734	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective		
Please identify the policy, paragraph, table, figure or site to which you are referring.	the whole document				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>you have discriminated against the elderly and disabled who do not have computers and can not access the plan. There was no proper notification of this plan. We found out when a neighbour knocked on the door two days ago. The documentation is huge and your computer system keeps crashing. We have terrible problems with broadband not working for over the last three months here , and we have had great difficulty getting access to the plan. There should be a conservation study of the field and surrounding area .We have a lot of rare wildlife in our garden.No-one has done a proper survey which the conservation charities told me should be done.We have bats owls , swallows that nest in Rosnheim Rise.There are a lot of reptiles and lizzards in our garden as well as unusual orchids and butterflies.Not to mention the hedgehogs , and the badgers who come down the footpaths . I phoned the planning department in March 2011 before we moved here to check about building as we were moving to get away from developers.I was told they would never build on the field at the back of us. We would never have moved here if we thought they would build. We need a paper copy of the plan for Bratton development to be available . There needs to be a comprehensive conservation survey completed,</p> <p>It has information which is inaccurate such as the number of residents and the proportion development.. The development is outside the village boundary A smaller development was refused twice because the road was considered to dangerous and the buildings blocked out light on our houses. The site is very steep and what will happen to drainage it could cause landslide in to our garden.It is in a flood area. A paper copy of the plan made available to all. The whole village informed of plan A conservation survey Proper dialogue with residents.We only found out through a neighbour telling every-one.We should have had a letter informing us.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	972	Consultee Mr Christopher Hart	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126230		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111),SA objective 2,SA objective 7,SA objective 10,SA objective 11,		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I believe this is inconsistent with: SA objective 11. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth Because the proposal to build a significant housing site on the south of the city boundary runs contrary to the north of Salisbury development plan that is already on-going between Old Sarum and Boscombe Down. People would need to travel out of this area to their places of employment as there is no real employment opportunities in this area. Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads.</p> <p>I do not believe this is the right area to build significant new housing. A further option would be to relocate Churchfields industrial estate and use this site for housing.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	973	Consultee Miss Joanne Lee	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126216		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Hilperton Gap (HSAP reference 263/297) The proposal is not justified because it is contrary to the Wiltshire Core Strategy (Trowbridge Area Strategy). This states that “it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities.”</p> <p>The fields of the Hilperton Gap are a green open space vital to and well used by the local community. Please reconsider this development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	974	Consultee Mr Christopher Hart Person ID: 1126230	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111),SA objective 2,SA objective 7,SA objective 10,SA objective 11,		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The Harnham Road is already at maximum capacity and without the prospect of widening this development will make it intolerable for locals. At present in rush hour and at peak times of traffic through put, the Harnham Gyratory rapidly becomes gridlocked with vehicle backed-up along the Netherhampton and Coombe Bissett Roads. The roads cannot sustain an increase in what could be up to 1500 additional vehicles using this road.</p> <p>Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads.</p> <p>I believe the development plan is not planned effectively as the residents would need to commute out of the area on a daily basis for work, shops, doctors, etc and the roads could not sustain this increase in traffic</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	975	Consultee Mr Christopher Hart	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126230		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site S1028 - Land at Netherhampton Road, Salisbury (pages 93-111),SA objective 2,SA objective 7,SA objective 10,SA objective 11,			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I believe this is inconsistent with: SA objective 11. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth Because the proposal to build a significant housing site on the south of the city boundary runs contrary to the north of Salisbury development plan that is already on-going between Old Sarum and Boscombe Down. People would need to travel out of this area to their places of employment as there is no real employment opportunities in this area. Salisbury's future housing should be built on a combination of existing 'brownfield' sites close to trading/business parks/estates and where there is ongoing industrial and housing developments. The existing Salisbury North Development strategy (Old Sarum/Porton Down/Boscombe Down) already goes a considerable way to meet these requirements without having to readdress old and cancelled road bypass plans and the associated prospects of building infill to new perceived boundary's created by the roads. There are other sites that would be more appropriate for housing development such as those listed above or another alternative would be Churchfields.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	976	Consultee Mrs Elaine Wood Person ID: 1126323	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 Netherhampton Road Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Traffic</p> <p>The A3094 is a well used cut through from the south to the west of the city and viceversa and it is controlled at the Harnham Gyratory and the Wilton Wall by traffic lights. The Salisbury Transport Strategy in Nov 2012 found that both of these junctions were operating very near or at capacity. The Harnham Gyratory lights only allow 4 to 5 cars through at a time towards Downton, Salisbury District Hospital and Blandford causing long tailbacks at peak times. Building 740 houses will significantly increase traffic movements in both directions as a) there is no significant employment locally in Harnham/Netherhampton, b) the proposed new school will also take children from outside the catchment area who will arrive by car and b) there is only one small convenience store in Harnham for shopping, so residents will have to drive elsewhere to shop.</p> <p>The noise pollution from this increase in traffic will far exceed that from a proposed development of a hotel and 70 houses on the Booker site on the A3094 which was rejected in 2014 for exceeding government guidelines on noise pollution. There is no evidence that consideration has been given to the greater impact of 740 houses. Increased pollution from traffic emissions, especially from queueing traffic will also be harmful to pedestrians (particularly children walking to the existing Harnham School), wildlife and ecosystems. Salisbury is already an Air Quality Management Area exceeding EU guidelines.</p> <p>Due to existing development along the A3094 Harnham Rd/Netherhampton Rd it is impossible in the future to widen the road and existing pinch points such as outside All Saints Church make the road unsuitable for heavy construction site vehicles and the proposed increase in vehicles. A suggestion in the WHSAP that new home owners will walk into Salisbury using Bridleway NHAM10 seems unlikely due to the distance involved and there are no recommendations to make the new development have roads wide enough for a bus route to operate. I understand the existing Wellworthy estate on the Netherhampton Road is too congested with parked vehicles to allow a bus to run around it.</p> <p>The increase in traffic will also make it more difficult for pedestrians to cross safely and for emergency services (especially ambulances heading west from the ambulance station) to safely and speedily use the A3094.</p> <p>As a city on 5 rivers traffic around Salisbury is dependent on bridges already built and the existing roads. Before any further large developments are given the go ahead a comprehensive analysis of traffic flow needs to be completed and new infrastructure put in place to service any new developments. At present there is no evidence that improvements to the transport network can be undertaken to accommodate the scale of the proposed development, making this plan unsound.</p> <p>As much of the traffic coming and going from this site on the Netherhampton Road will access work, shops and schools via the Newbridge Road it is also relevant that a smaller development adjacent to Britford Lane has recently been turned down because of the volume of traffic already using this road.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	977	Consultee Mr Richard Platts Person ID: 1126750	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.14				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The consultation process has not been notified to us as affected neighbours to the site in any formal way. We were only alerted to this consultation process by word of mouth. Timing out the entry of comments on this consultation section restricts my ability and opportunity to comment. Proper formal notification to all those directly affected of the detail of the plan An easier to navigate less restrictive response process. 1. Far too much documentation to digest, a non intuitive website to research and enter comments. 3. No details of the planned housing to enable a proper judgement to be made. Simplified explanations and improved comment website				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	If no one speak out nothing will change				

Comment ID:	978	Consultee H Redford	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126219	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.136		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The paragraph refers to contributions towards improving the road network likely to be sought. This is inadequate, it should be mandatory that substantial contributions are sought from any developer both for the assessment of and provision of any required changes. The residents of this area already face considerable difficulties, at certain times of the day, in travelling from Harnham to other areas of the city via the 'Harnham gyratory' and it is difficult to see that these could be remedied easily for current volumes of traffic, let alone traffic from the proposed extra housing.</p> <p>It is concerning that a great deal of money and resources may be spent for an outcome of either that it is not practical to accommodate a development of the proposed size or that any changes proposed and made, turn out to not avoid severe congestion in the area.</p> <p>It is not clear what the cost to the local authority will be to enable a private developer to build, possibly to the detriment of those wishing to move around and live in the Harnham area.</p> <p>'The paragraph needs to set out how the improvements to the road network would be funded, not merely that contributions are 'likely' to be sought. This would make the plans more positively prepared. The assessment, findings and subsequent plans need to be transparent and made public for comment, this would make the plans more justified as it should be required that plans and changes do actually meet the needs of the area if the development goes ahead. The above two measures would make the plan more effective as it would demonstrate more fully the appropriateness or not of the proposed plan.</p> <p>What consideration has been given for a much smaller development in this area?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	979	Consultee Mrs Gemma Gilham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 897270		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan is not positively prepared because it is not supported by the town council or Hilperton parish council. The land is situated within the Hilperton parish and therefore should not be considered as part of the Trowbridge housing allocation. The number of dwellings exceeds the requirement for a five year supply.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	980	Consultee Mrs Dilys Jones	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126635	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The land at Elm Grove Farm has been shown in previous iterations of the Development Plan over many years as land to be retained as a buffer between Trowbridge and North Bradley and should continue to serve this function. North Bradley will otherwise become a suburb of Trowbridge and lose its village character and identity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	981	Consultee Mr Duncan and Hayley Turp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The size of the village has been grossly overestimated by the council - The data published and analysed by Wiltshire Council is not correct. According to data collected in the 2011 Census, Bratton actually contains 512 homes not 819, 307 fewer than stated in the Site Allocation Plan. There has been no informing of residents about this consultation process or the intention to develop the land.</p> <p>The proposal does not take into consideration any of the concerns raised by the council or local residents. The size of the village has been grossly overestimated by the council - The data published and analysed by Wiltshire Council is not correct. According to data collected in the 2011 Census, Bratton actually contains 512 homes not 819, 307 fewer than stated in the Site Allocation Plan. There has been no informing of residents about this consultation process or the intention to develop the land.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	982	Consultee Mr Rob Parker-Norman	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126764	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have seen no notice that this review was underway. I was of the impression that every effort should be made to engage with the community in these situations.</p> <p>I should like to suggest that notices are posted in the village and on the site and adjacent areas so that people who will be directly effected are given the opportunity to be properly informed and provide feedback accordingly.</p> <p>Without the actions of fellow concerned residents, I would have been unaware entirely of this proposal despite my property lying adjacent to the site.</p> <p>Consider other sites within the village and local area.</p> <p>I am particularly troubled that on several previous occasions this site has been found to be unsuitable for development. I have not yet seen any reason to see why this development for more dwellings will be more appropriate for the proposed site than in previous years.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	983	Consultee mr richard parsons Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Worton Neighbourhood Plan Person ID: 1126765		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A6 Worton Settlement Boundary map			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Neighbourhood Planning Group of Worton wishes to question how the new DPD settlement boundary was decided for Worton, as we suspect it may be in error. The old Kennet boundary included all the housing along Mill Road from (which starts at the C20 and continues to the turning south at Norney Bridge) within the settlement boundary but the draft DPD reviewed boundary has no settlement boundary at all in this area. The NP Group suspects that when the consultation in 2015 was considered only the main settlement area of Worton was reviewed and the map sent by Worton parish council to Wilts council forgot to include the Mill Road area. We suggest that the Mill Road area, which is considered as part of the settlement of Worton, is included in the settlement boundary, there would likely be a gap between the 2 settlement areas but this would be iaw the Kennet plan which is what the boundaries are based on according to chapter 6.1.				
Attached files (Please see Objective)	4711929				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	984	Consultee Mr Mark Warner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126763	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I oppose the plans for the following reasons: NOT FAIR OR PROPORTIONATE The proposed sites for 640 dwellings and 100 dwellings (and in principle, according to the assessment, a total of up to 1277 dwellings) along Netherhampton Road represent a vastly disproportionate burden on Netherhampton village and will in effect completely swamp it – moving the day much closer that the village will become just another anonymous suburb of a sprawling Salisbury. • The proposed allocations in Netherhampton alone would deliver a number of dwellings far in excess of the number required to meet the projected shortfall for the whole of South Wiltshire (Wiltshire Council’s estimate for this shortfall yet to be allocated is 594 dwellings). Why therefore are these huge allocations necessary? The Draft Allocation Plan is unsound since, regarding Site H3.1 / S1028, it is not clear whether the draft plan is for the headline 640 dwellings or for the potential 117 dwellings that the planners have suggested would be possible.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”</p>				

Comment ID:	985	Consultee Mrs Samantha Bennie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126770		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Settlement Boundary review methodology and Revised proposals for Downton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Because the proposed revision of the boundary in question has inconsistencies relating to properties on the perimeter of the settlement boundary.</p> <p>There are some gardens (as in grid reference I & J 4) which are now included within the boundary whilst others (L& M 8 & 7) have been excluded. It is understood that the methodology excludes the curtilage of a property that relates more closely to the open countryside, but in this case the site in question, though on the edge of the settlement, lies between two existing buildings, and should therefore be included.</p> <p>The garden referenced above (L&M 8&7) was defined as a SHLAA site (S1044), but was discounted in the Downton Parish Neighbourhood Plan, as the allocations had already been reached with other sites. This site is the garden of a house, developed some 10 years ago and lies between that property and another property (also shown to be outside the settlement boundary). Following the settlement boundary North of these properties, the boundary continues much further to the East, than the garden referenced here, therefore the proposal is inconsistent.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	986	Consultee Mr Philip Redhead	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125773		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. The Plan makes no provision for additional schools, GP surgery's or dentists, to name a few of the essential services that will be required to support the increase in population this development will bring. Brown field sites must be developed first in preference to green belt land. Sufficient provision for additional schools, GP surgery, dentist capacity and other essential services must be considered.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	987	Consultee Mr Philip Redhead	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125773		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>4. This area has a unique aspect having a readily accessible network of footpaths with open views of the countryside where many people enjoy exercise and fresh air away from roads and built up areas. These open spaces support a significant amount of wildlife (we see many badgers, foxes, owls etc.) that would be displaced or lost to make way for the housing. The unique character and features of this area would be lost forever if the development goes ahead.</p> <p>Brown field sites must be developed first in preference to green belt land.</p> <p>Sufficient provision for additional schools, GP surgery, dentist capacity and other essential services must be considered.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	988	Consultee Mr Philip Redhead	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125773		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>5. Traffic builds up significantly at peak times each day on Elizabeth Way - the 200 additional homes will bring a significant additional volume of traffic to an already busy area increasing travel times and pollution. Housing is required where jobs are being created, not in Trowbridge where jobs are scarce and many residents are forced to travel long distances to work which is environmentally unsound.</p> <p>Brown field sites must be developed first in preference to green belt land. Sufficient provision for additional schools, GP surgery, dentist capacity and other essential services must be considered.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	989	Consultee Mrs Carolyn Clarke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126769		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.	South Wiltshire housing Market Area Table 4.6				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Land North of Netherhampton Road is next to the Water Meadows, my concern is that building on this land will cause severe flooding in Harnham. Also there is no mention of upgrading the Netherhampton road and all the necessary structures that would need to be in place to support another 740 houses in this area. This road is already always very busy, often queues stretching back to Netberhampton Road from the Gyratory. I do not agree with this plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	990	Consultee Mr Chris Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125408		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure: 5.18 H2.14		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Planning Permission has previously been refused on two occasions to "preserve the character and scenic quality of the landscape". Why are Wiltshire Council reconsidering this?</p> <p>Planning permission has previously been sought from a private developer for the development of houses on the plot of land in question. Permission has twice been rejected by Wiltshire Council on the following grounds:</p> <p>"The site lies within a Special Landscape Area... (which) seeks to preserve the character and scenic quality of the landscape by generally restricting development to that which is essential to the rural economy.</p> <p>The local planning authority considers that the edge of the existing village is well defined and that the housing development proposed, together with the access road thereto across the field in front, would be a substantial intrusion into the rural landscape, and would therefore be detrimental to the character and scenic quality of the area."</p> <p>However, following the publication of the Draft Site Allocations Plan for the Westbury Area (2017), it appears that Wiltshire Council may be about to overlook these objections and sacrifice the area in order to comply with government-set targets.</p> <p>There were further reasons for rejection stated on both decision notices, but these refer to outdated policies that have been replaced and are no longer of relevance.</p> <p>5) The plan would be more sound if it didn't override the reasons cited in the two existing planning application refusals. The justification for refusal is still valid and therefore an estate of this nature should not be approved for the edge of the village.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To give an opportunity to question flaws in the plans in person.			

Comment ID:	991	Consultee Mr Chris Joyce Person ID: 1125408	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective
Please identify the policy, paragraph, table, figure or site to which you are referring.	Specifically referring to site 321 (Bratton)			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>- Incorrect and non-factual information cited. This incorrect information has been used to justify decisions. For more details (to save repeating the same point twice) please see points 2 and 7 in the paragraph under the heading "Please give details of why you consider the draft Wiltshire Housing Site Allocations Plan is unsound."</p> <p>A recalculation of the relative growth of this development should be undertaken and published as fact using referenced data. Please refer to points 2 and 7 in the paragraph under the heading "Please give details of why you consider the draft Wiltshire Housing Site Allocations Plan is unsound."</p> <p>3) With reference to site 321 - the Housing Site Application overrides the results of a 2014 Bratton Parish Council Housing Needs survey, which identified a small requirement for housing in the village.</p> <p>In 2014, Wiltshire Council published the results of the Bratton Parish Housing Needs Survey. The aim of the survey was "to investigate the need for affordable housing among local people (or those who have a need to live in the parish or the locality) of Bratton." The survey recorded a "very good" response rate of 198 replies (35.9%).</p> <p>Of the 198 replies, very few respondents indicated their need for additional housing in Bratton. All declared a local connection to Bratton, and the most popular reason given for needing to move was in order to move on from living with families and achieve independence.</p> <p>A summary of the results of this survey is included in the Wiltshire Site Allocation Plan as follows:</p> <ul style="list-style-type: none"> 2x one bedroom homes 1x two bedroom home 2x three bedroom homes 2x low cost two bedroom homes 1x low cost four bedroom home <p>The number of houses requested by members of the Parish is significantly less than the 40 houses allocated to the village by Wiltshire Council.</p> <p>Furthermore, the Parish Council identified in a meeting on 12th September 2017 that they have recently discovered they own adequate land to provide this housing in the Pear Tree Orchard area of Bratton. It was concluded in that meeting that 'infilling' the village is preferable to expanding the historic boundaries of the village in the near future.</p> <p>In addition, the Wiltshire Core Policy (2015) states that infilling is preferable to extending village boundaries.</p> <p>The bullet points below refer to the bullet points that are in my above text under the heading "Please give details of why you consider the draft Wiltshire Housing Site Allocations Plan is unsound."</p> <p>1) The plan would be acceptable if it developed conclusions that adhere to the results of its own assessments - not conclusions that ignore the results. It would more more sound if the results were not 'engineered' to conveniently find a site that could house 40 of the target 47 dwellings, as set out in the report. It would be more sound if the conclusions of the report reflected the results of the assessments carried out.</p>			

2) The plan would be more sound if it did not draw important conclusions upon assumptions - for example the assumption that the B3098 is 'peaceful'. Drawing conclusions upon factual, quantified information will make the report sound.

3) The plan would be more sound if it took into account the results of local studies that have identified the requirements and needs of local people. However, this report has identified these needs and then proceeded to ignore the results by allocating 5x the requirement identified by the research.

4) The plan would be more sound if it accounted for the individualistic character of the village, and considered that a dense estate of this nature is out of this character. In addition, the report would be more sound if it considered the figures I have presented regarding housing density issues and the fact that, as acknowledged, car ownership will be essential and parking will be an issue as it is in many estates across the county.

5) The plan would be more sound if it didn't override the reasons cited in the two existing planning application refusals. The justification for refusal is still valid and therefore an estate of this nature should not be approved for the edge of the village.

6) A recalculation of the relative growth of this development should be undertaken and published as fact using referenced data.

7) The plan would be more sound if it did not contradict the Wiltshire Core Policy (2015). Please advise which Policy (of the two discussed) has a greater power to override the other.

Finally, the plan would benefit from local sensitivity. There is no mention of the character of the village of Bratton and the types of housing, the quantity of green space, the low density of housing etc.. The village is not a high-density housing estate. Bratton is a beautiful, individualistic village. Most houses are different, independent and unique. It is not an inner-city housing estate and the residents of the village will not accept their village being ruined by high-density housing that is unnecessary and will create an enormous eye-sore, parking problems and increased traffic on one of Wiltshire's most dangerous roads.

As mentioned in my above comments, the site is unsuitable. The road is dangerous, the sustainability assessment scored the site negatively in 9 of the 12 criteria, planning has been refused twice to "preserve the character and scenic quality of the landscape", the development will remove two Public Rights of Way (footpaths dating to at least 1887), the site is classified as a Special Landscape Area, borders the Bratton Conversation Area, is a site of medium archaeological sensitivity and is overlooked by a Site of Special Scientific Interest (SSSI). The proposed development significantly exceeds the requirements identified in a local study.

If development was to ever go ahead, I believe villagers would only accept a development if it was tastefully developed in a way that is sensitive to the existing housing in Bratton - sparsely populated, unobtrusive, unique housing with large gardens and lots of green space.

Please see www.brattonhousing.com for more information.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

So that I have to opportunity to present my opinion face-to-face. This reduces the ability to ignore the concerns and comments submitted and gives me an opportunity to question the plans in person.

Comment ID:	992	Consultee Mr Chris Joyce Person ID: 1125408	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure: 5.18 H2.14		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocation Plan (2017) for the Westbury Area incorrectly states that Bratton contains 819 dwellings (actual figure = 512). It then justifies the 40-dwelling development due to its small percentage increase in relation to total housing increase. Table E.1 in Appendix E (page 39) of the Wiltshire Council Site Allocation Plan it states that Bratton contains 819 dwellings. It then highlights that the village has experienced growth of 26 houses, or 3.2%, in the last 10 years. The data published and analysed by Wiltshire Council is not correct. According to data collected in the 2011 Census, Bratton actually contains 512 homes (307 fewer than stated in the Site Allocation Plan). The addition of 26 houses therefore actually represents a 5.1% increase in the number of dwellings in the village in the last ten years. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. This is significant growth for a village of Bratton's size and will further increase strain on services such as the B3098, existing water pressure issues and the local GP surgery.</p> <p>6) A recalculation of the relative growth of this development should be undertaken and published as fact using referenced data.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To give an opportunity to question flaws in the plans in person.				

Comment ID:	993	Consultee Mr Chris Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The density of the estate (40 houses in 12,500m²) is far too high for a village like Bratton. Parking is a significant issue in high-density housing estates, and the Wiltshire Housing Site Allocation even acknowledges that car ownership will be essential for residents. Bratton has a housing estate named Manor Fields. It contains a mix of 66 affordable, small and large family homes over 26,057m². This equates to 395m²/dwelling. Manor Fields has parking problems, with many households owning more than 2 cars and residents forced to park on the street.</p> <p>The proposed development at site 321 is for 40 dwellings over an area of 12,529m² - this equates to 313m²/dwelling. This is a significantly smaller area per household than in Manor Fields.</p> <p>In fact, this would be the equivalent of squeezing 17 additional houses into Manor Fields, which all residents of the village know is neither feasible nor acceptable. Bratton is a unique village - it is not an inner-city high-density housing estate.</p> <p>The proposed estate will be far, far too cramped, and parking will be a significant issue.</p> <p>The plan would be more sound if it accounted for the individualistic character of the village, and considered that a dense estate of this nature is out of character with the area. In addition, the report would be more sound if it considered the figures I have presented regarding housing density issues and the fact that, as acknowledged, car ownership will be essential and parking will be an issue.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To give an opportunity to question flaws in the plans in person.			

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Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure: 5.18 H2.14		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Housing Site Application overrides the results of a 2014 Bratton Parish Council Housing Needs survey, which identified a small requirement for housing in the village.</p> <p>In 2014, Wiltshire Council published the results of the Bratton Parish Housing Needs Survey. The aim of the survey was “to investigate the need for affordable housing among local people (or those who have a need to live in the parish or the locality) of Bratton.” The survey recorded a “very good” response rate of 198 replies (35.9%).</p> <p>Of the 198 replies, very few respondents indicated their need for additional housing in Bratton. All declared a local connection to Bratton, and the most popular reason given for needing to move was in order to move on from living with families and achieve independence.</p> <p>A summary of the results of this survey is included in the Wiltshire Site Allocation Plan as follows:</p> <ol style="list-style-type: none"> 1 2x one bedroom homes 2 1x two bedroom home 3 2x three bedroom homes 4 2x low cost two bedroom homes 5 1x low cost four bedroom home <p>The number of houses requested by members of the Parish is significantly less than the 40 houses allocated to the village in the HSAP. Furthermore, the Parish Council identified in a meeting on 12th September 2017 that they have recently discovered they own adequate land to provide this housing in the Pear Tree Orchard area of Bratton. It was concluded in that meeting that ‘infilling’ the village is preferable to expanding the historic boundaries of the village in the near future.</p> <p>In addition, the Wiltshire Core Policy (2015) states that infilling is preferable to extending village boundaries.</p> <p>3) The plan would be more sound if it took into account the results of local studies that have identified the requirements and needs of local people. However, this report has identified these needs and then proceeded to ignore the results by allocating 5x the requirement identified by the research.</p>				
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Comment ID:	995	Consultee Mr Chris Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
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Please identify the policy, paragraph, table, figure or site to which you are referring.		Figure: 5.18 H2.14		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>In a number of locations, the document makes incorrect assumptions without factual evidence. It then cites these incorrect assumptions as evidence and justification for allowing development. For example: Stage 4a (Site Landscape Assessment) of the Wiltshire Housing Site Allocation Plan (2017) states the following with regard to the B3098: "The B3098 Westbury Road does not appear to be a particularly busy road and the landscape at the western edge has an exposed and remote feel. Overall the site and immediate landscape context is peaceful." The Wiltshire Housing Site Allocation Plan (2017) for the Westbury Area then uses this un-evidenced statement to justify the site as "achievable". In the absence of a quantified rush-hour traffic study, this statement regarding how busy the road is meaningless. The road is very busy during peak times - as a resident that has to pull out directly onto the road daily at 07.30am, I can confirm that it often takes a minute or two for an adequate gap in traffic to appear. Adding an additional 40 homes will add at least 80 cars - all of which will also be trying to pull out onto the road at peak times. As a resident that has lived in the village since birth, I can confirm that I have a much better understanding of the traffic problem than the authors of this report do. Data collected from the National Statistics Authority shows that between January 2000 and March 2017, there were 49 collisions on the 3-mile stretch of the B3098 between Bratton and Westbury, 11 of which were classified as serious. The total number of casualties was 77. This is not a suitable road for an additional 80+ cars every day.</p> <p>7) With reference to site 321. The Wiltshire Housing Site Allocation Plan for this area contradicts Wiltshire's Core Policy (2015) Wiltshire Council's Core Policy (2015) states that the Council does not wish to deliver strategic housing in Large or Small Villages in the county. As such, this proposal is contradictory to the Core Policy. The core policy is published and finalised. The plan would be more sound if it did not draw important conclusions upon assumptions – for example the assumption that the B3098 is 'peaceful'. Drawing conclusions upon factual, quantified information will make the report sound.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To give an opportunity to question flaws in the plans in person.			

Comment ID:	996	Consultee Mr Barry Cridland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125096		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Harnham - 840 New Houses		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have seen nothing to prove this - no evidence has been offered that justifies this. describe to those affected under which laws and statutes that you are proposing this. Removing of agricultural land at a time of uncertainty of future supply due to the EU leaving plans .				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	You should listen to those affected, who pay the taxes to fund the developments and understand how we want our money spent.				

Comment ID:	997	Consultee Mr Barry Cridland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125096		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Harnham - 840 New Houses		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have seen nothing to prove this - no evidence has been offered that justifies this. describe to those affected under which laws and statutes that you are proposing this. No plan for locals to be able to afford the new houses. Full and complete consultation with local residents Guarantees on housing availability for existing Harnham and Netherhampton residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	You should listen to those affected, who pay the taxes to fund the developments and understand how we want our money spent.				

Comment ID:	998	Consultee Mr Barry Cridland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125096		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Harnham - 840 New Houses		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have seen nothing to prove this - no evidence has been offered that justifies this.</p> <p>describe to those affected under which laws and statutes that you are proposing this.</p> <p>No plan for schools, traffic management, shopping, elderly occupants, health and wellbeing.</p> <p>Full and complete consultation with local residents</p> <p>Traffic measurement and management planning to be undertaken.</p> <p>Guarantees on housing availability for existing Harnham and Netherhampton residents.</p> <p>Honest laying out of how much disruption will be caused, how long it will take and what compensation is offered.</p> <p>Details of increased capacity at GP surgeries, hospitals, schools and when they will be in place.</p> <p>Details of increased bus services to serve the new build community.</p> <p>Details of noise and nuisance mitigation plans to be in place before construction starts.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	You should listen to those affected, who pay the taxes to fund the developments and understand how we want our money spent.				

Comment ID:	999	Consultee Mr Barry Cridland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125096		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Harnham - 840 New Houses		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have seen nothing to prove this - no evidence has been offered that justifies this. describe to those affected under which laws and statutes that you are proposing this. No consideration of alternatives such as the Garden City proposal for North Wiltshire.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	You should listen to those affected, who pay the taxes to fund the developments and understand how we want our money spent.				

Comment ID:	1000	Consultee Mr Steven Harrison	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125632		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This site is a natural ancient water meadow and as such is home to a great diversity of wildlife. Bats, dear, voles, owls and a host of other animals use this secluded site.</p> <p>Being a water meadow this site along with the fields on the other bank provide a natural fast recovering flood plain for the Lambrok stream. The stream already comes very close to flooding the road at times of heavy rainfall. Any further building upstream will make the retention of this natural flood plain vital.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1001	Consultee Mr Steven Harrison	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125632		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Trowbridge and the surrounding area has a host of "Brownfield Sites" which need to be fully utilised before any "Greenfield Sites" should be allocated for additional housing.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1002	Consultee mr Ian Ian Humphrey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126760	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The housing plan will have an adverse impact on local amenities and represents over development within this, already large, village. Local facilities and services are currently failing to adequately support needs of residents, further development would have a disastrous impact on an already over burdened infrastructure, particularly in respect of health provision and highway usage.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1003	Consultee Mr Jeremy Retford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126672		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Practical constraints and problems associated with the site</p> <p>A planning application for the development of some 29 houses on Ridgeway Farm was submitted to Wiltshire Council in 2014. That application drew much local opposition, principally on the grounds of the scale of the development, and its likely impact on Crudwell's infrastructure. Specifically: the likely increased traffic on Tetbury Lane; impacts on already overburdened drainage and sewerage systems and oversubscription to Crudwell Primary School. That plan was withdrawn, and a revised plan for a reduced development of 10 houses was submitted and approved (subject to a number of conditions). All the issues and concerns relating to the original proposal for 29 houses remain and a further 21 houses clearly exacerbates them. To expand further on key points:-</p> <p>The allocated 50 dwellings will cause a very significant increase in traffic along Tetbury Lane, which is narrow and has no footpaths. The lane is currently used regularly by pedestrians and school children, raising significant safety concerns. There is no room to install a footpath from Ridgeway to the main A429 without purchasing garden frontages. The condition of the road itself is already very poor. The junction with The Street (A429) will need improving to allow safe exit of rush hour traffic.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1004	Consultee Mr Jeremy Retford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126672		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	To expand further on key points:- Crudwell suffers from long standing sewage and surface water drainage issues especially after prolonged periods of rain (the whole centre of the village flooded twice in 2008). The current infrastructure is demonstrably unable to cope with extreme conditions and this expanded development site will exacerbate the issue, without major additional infrastructure work which will need both careful development and significant funding.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1005	Consultee Mr Jeremy Retford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126672		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>To expand further on key points:- Crudwell CE Primary school is already full. I understand that Wiltshire Council's Education Department states that that new homes will require an additional classroom. This is on a constrained site and lies in a conservation area. Its ability to expand is not guaranteed. If the allocation in the Strategic Plan remains at 50 houses, I believe that number is sufficiently large to materially harm the village in ways such as those outlined above, but not large enough to attract the funding necessary to mitigate that harm properly.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1006	Consultee Mr Jeremy Retford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am aware that Crudwell does not yet have an agreed Neighbourhood Plan, but work on this this is now underway. In my opinion, as there is no strategic need for any further housing allocations in Crudwell, it would be more appropriate for that Neighbourhood Plan be allowed to determine the additional level of local housing need and to examine how this might be accommodated, and our infrastructure improved or expanded as necessary, to keep a balanced, safe, functioning and happy village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1007	Consultee Mrs Dilys Jones	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126635	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Drynham Road and Dursley Road are wholly unsuitable to provide for the additional traffic seeking access to the town centre generated by the proposed development. The proposed link to the A363 will only provide an attractive access to the south.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1008	Consultee Mrs Dilys Jones	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126635		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The wildlife corridors provided by the long established hedgerows attract many species including bats which enjoy a high degree of protection. The proposed development threatens this habitat.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1009	Consultee Mr. Paul Cunningham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 862429		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		South HMA		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		One more general point: Wiltshire is effectively putting all of its eggs on one basket, with approaching 90% of the South Wiltshire shortfall being proposed on sites in Harnham and Netherhampton. With regard to the large site for 640 hours+ in Netherhampton they need to carefully consider whether this allocation will in effect meet their commitment to central government up to 2026 - recent research suggests that developments of 500+ houses take on average 11 years from allocation to build. If the allocation is confirmed next year they could take until 2029 to get built. Given the extraordinary obstacles with regard to water, roads, infrastructure and visual amenity, there is every chance that they would take longer. Think again, or it could get very embarrassing!!			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I am Chair of Netherhampton Parish Council			

Comment ID:	1010	Consultee Mr and Mrs Bernard and Heather Hicks	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1139654	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Chippenham Community Area - Shlaa 3129			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We can only identify that the rejection of Shlaa 3129 at Stage 2 was because of "unknown availability" yet in a pre-planning application we were informed "that the Strategic Planning Team have clarified that no response was received from the landowners". As the landowners, we cannot recall having any correspondence from the planning team to respond too.</p> <p>Thus, we find the exclusionary criteria unsound.</p> <p>Being that the land was available and having not been consulted, we feel that you should reconsider our position and take Shlaa 3129 for further consideration in the future.</p> <p>The recent Hullavington Neighbourhood development Plan identified this piece of land for development and placed it second after Shlaa 690.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1011	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126779		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road, policies H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In principle, the development of a greenfield site for no other reason than that there have been delays in making a brownfield site available is entirely wrong. It would be far better to concentrate on freeing up and developing the brownfield site in question, rather than destroying permanently an important rural greenfield site on the edge of the city. To permit urban sprawl of this nature simply to overcome a short term planning glitch is completely ill- conceived, and is neither justifiable nor sustainable.</p> <p>This submission is made on behalf of the South Wiltshire Group of the Campaign to Protect Rural England (CPRE).</p>				
Attached files (Please see Objective)	4712016				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to stimulate public discussion on the points made above and in the attached document.				

Comment ID:	1012	Consultee Mr John Edmunds	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126785	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Priority needs to be given to building on brown field sites (e.g. Bowyers redundant site). Plan not justified because Wiltshire Council have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1013	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126779		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Policies H3.1 and H3.3 (Salisbury - Netherhampton Road)		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The impacts on transport are particularly serious, and there is no accurate basis for the assertion that they are capable of mitigation. The Salisbury Traffic Model is deeply flawed, and likely to lead to erroneous conclusions. It should be remembered that, at the time of the Examination in Public for the South Wiltshire Core Strategy, the Harnham Residents Association arranged a 'drive-in' during the morning rush hour to attempt to mimic the impact of the much smaller development then proposed for Netherhampton Road on the traffic situation. The result was chaotic, with enormous queues building up on and around the Harnham Gyratory.</p> <p>In order to make the Wiltshire Housing Site Allocations Plan sound, it will be necessary to abandon the proposed developments in Netherhampton Road.</p> <p>Transport Strategy</p> <p>2.1 The [Salisbury Transport] model, as evidenced by the Model Validation documents, was seriously flawed [May 2010]. There were various problems with the model, which, in summary, were:-</p> <ol style="list-style-type: none"> 1) The journey time surveys adopted arbitrary routes, diluting congestion points. 2) The justification for augmenting the HGV responses was dubious. 3) I agreed with Wiltshire Council's observation that movements within the roadside interview cordon were possibly underobserved. 4) Observed and expected values for trip ends were significantly different. 5) The link length validation indicated a minimum error rate of 27%. 6) Model validation was largely confined to the A36. 7) The model failed to consider the knock-on effects on surrounding areas. 8) The impact of the errors on the model predictions should have been assessed by sensitivity analysis. 9) The model predictions to 2026 should have been given as a range, determined by calculating 95% confidence intervals for the input variables, to reflect uncertainty. 10) Parking. The so-called 'radical' option says that motorised traffic to the city centre in peak hours will not increase, but it is very clear from the revenue projections for parking (envisaging a nine-fold increased in revenues) that, overall, traffic will increase substantially (NB. Prices are due to rise by 50%, and short-stay parking is more expensive anyway, so probably a three to five-fold increase in traffic is indicated). <p>2.2 Wiltshire Council's response failed to answer most of these points, i.e. :-</p> <ol style="list-style-type: none"> (1) to (5): Not answered at all. (6) Accepted. (7) Not answered at all. (8) "Sensitivity tests will be undertaken as part of the transport strategy finalisation process." Since the whole point of this would be to assess the impact of the errors in the model on the predictions, it was not adequate to leave this to the final stages, after finalisation of the Core Strategy. which depended very much on these predictions. 				

	<p>(9) Not answered.</p> <p>10) The parking question is referred to very briefly, but the statement "... the percentage increase in car park trips being relatively minor in contrast to the overall number of movements" is not consistent with the projected nine-fold increase in parking revenues, nor with the predicted changes in emissions.</p> <p>2.3 The preparation of a series of amendments to the DPD re the South Wilts. Core Strategy gave the Council another opportunity to address these problems, but they did not do so, and so they remained unresolved.</p> <p>2.4 In my commentary at the time, I concluded that "the main thrust of Wiltshire Council's response is that the model has been constructed according to an appropriate methodology. That is not in dispute. What is a matter of concern is the number of data errors and apparent distortions that have crept in, which must impact on the model outputs, the inadequacy of the validation, and the lack of sensitivity analysis. As a result, some of the assertions, re parking for example, or peak time flows at certain key locations, appear contradictory or frankly bizarre."</p> <p>2.5 The flaws in the model are of such seriousness that the so-called 'refresh' that the Council are proposing should take the form of a root-and-branch re-evaluation of the entire approach.</p>
Attached files (Please see Objective)	4712017
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to stimulate public discussion of the issues raised above.

Comment ID:	1014	Consultee Mrs Ann Edmunds	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126789		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not positively prepared because it does not meet objectively assessed development requirements. Increasing the size of Trowbridge by one quarter during the Plan period which will exceed the requirement for a five year supply. National policy requires proper weight is given to brown field sites. Wiltshire Council have failed to give this proper weight. NB. The current derelict 'Bowyers' site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1015	Consultee Mr & Mrs Andrew & Sue Miluk Person ID: 1126790	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We are writing to express our concerns regarding the draft Wiltshire Housing Sites Allocation Plan. We reside in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:-</p> <p>Contradictions in the strategy: A core strategy or local plan is considered to be 'sound' when it is consistent with National policy. Paragraphs 72, 111, 156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide:- The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. We do not believe that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site: however, these will not be completed in time. No reference has been made in respect of the much needed development of empty areas within Trowbridge town centre. This is not sustainable development, rather opting for developer friendly sites. Accessibility from Sites 3565. 3620 and 1021: The A361 is a notorious blackspot for accidents within the dip of the road (where cars currently turn into the Southwick Country Park) and also within the 30mph limit zone further up the hill. Further access points - even with tightened speed restrictions - would only exacerbate matters. Sites at Church Lane, Southwick Court and Old Brickfields are being considered as they would allegedly reduce traffic (if residents potentially walked into Trowbridge rather than using their own vehicles). However, no evidence has been offered to suggest that this would be the case. The majority of households have 2 cars; therefore, there could be an additional 400 vehicles travelling along the Frome Road which is always congested during peak rush hour times. The Local Authority's justification for the development here (as opposed to local villages) on the basis that it provides sustainable development, is patently brought into question. There is neither the infrastructure or setting for development on this side of Trowbridge town.</p> <p>Maintaining the local environment Sites 1021 and 3620:</p> <p>It is well known that the fields at the rear of Church Lane and Oldbrick Fields provide extensive views across the local countryside. The fields provide an ongoing habitat for deer, rare bats (some species of which are protected), Voles and a multitude of birds. Furthermore, ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archaeological site of an ancient water meadow. These should be protected, as stated in the National Planning Framework and the Core Strategy itself.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1016	Consultee Mr Matt Kane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126784		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Crossways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing in support of the allocation, but wish to identify some items that should be considered in any development. My perspective is as a resident of a property that is nearly adjacent to the site.</p> <p>The B3098 is a high speed, low volume road. Traffic calming in the vicinity of the site could help improve safe access. A pedestrian crossing near the Castle Road bus stop and a pavement between Castle Road and Combe Lane, or a crossing at the Court Lane junction would improve safe pedestrian access between the site and rest of the village. The footpath to Court Lane is likely to become the other main pedestrian route between the site and the village. The point where the footpath meets Court Lane opposite Bury Lane can be a dangerous place to cross, as traffic comes down Court Lane at high speed. Traffic calming in the upper, wooded part of Court Lane should be considered.</p> <p>While the addition of much needed affordable housing is welcome, it must be ensured that the design is in keeping with the village, particularly if it is to be significantly higher density than other parts of the village.</p> <p>The CIL should be used to improve capacity of Bratton Surgery, Bratton Primary School and Bratton Preschool.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1017	Consultee Mrs Jane Barker Person ID: 1125373	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write with reference to the proposals to allocate sites to build 640 new dwellings on the South side of Netherhampton Road in Salisbury and 100 new dwellings on the North side of Netherhampton Road.</p> <p>I live in St Mary's Road in Harnham and I wish to record my objection to these proposals for the following reasons.</p> <p>The site allocation document states that the proposals will be subject to transport network improvements necessary to accommodate the scale of development envisaged. No such suggestions are made as to what these improvements could be.</p> <p>The Harnham Gyratory System is already operating at capacity and indeed at rush hours is backed up, either into or out of Salisbury. In the morning rush hour this means the traffic is backed up along the Netherhampton Road past the entrance to St Mary's Road, a distance of well over half a mile. In the evening, it is already the case that traffic is backed up into Salisbury.</p> <p>The future residents of these new dwellings will not be employed in the Netherhampton Road because there is no planned new employment; they will have to travel to work. There are no new shops envisaged in these proposals; the future residents will have to travel to shop. Most, if not all, of these journeys will have to include travelling along the Netherhampton Road to the Harnham Gyratory System.</p> <p>It is easy to state that improvements will be needed but it is difficult to see how improvements could be made to accommodate the increased traffic from a total of 740 dwellings.</p> <p>Those of us who live on or near the Netherhampton Road and the Harnham Road are already aware of the noise and the pollution of what is a major route around Salisbury. The speed limit is often exceeded and there are many heavy lorries using this route. Adding to this traffic will only make matters worse. The plan does not even make mention of this, let alone provide any solutions.</p> <p>I understand that plans in the past to ease traffic congestion in and around Salisbury were abandoned and park and ride sites were set up. It seems to me that any significant new housing developments should be built so as to encourage use of the park and ride sites. There is no such site on the Netherhampton Road available for these proposed developments.</p> <p>I am also concerned about the environmental consequences of further building up stream along the River Nadder. The proposed properties on the North side of the Netherhampton Road will be subject to flooding. My own property, and others in St Mary's Road, are at risk of flooding from the River Nadder and have indeed flooded in recent years. The impact of any measures taken to protect the proposed dwellings from flooding must be assessed for those of us who live downstream.</p> <p>I note on page 30 of the site allocation document that mention is made of the potential later in the plan period to provide "employment land" for Churchfields businesses to relocate to the Netherhampton Road site in order to free up land at Churchfields for housing development. This emphasises the need for careful consideration of the traffic and environmental issues because any such further development will only exacerbate the traffic and environmental issues outlined above.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1018	Consultee Mr Graeme Slaymaker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Hullavington Neighbourhood Plan Steering Group Person ID: 1126792		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Policy H2.11 Figure 5.12 The Street Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Hullavington Neighbourhood Plan Steering Group wish to comment on the Wiltshire Council DPD consultation document. This comment refers to the DPD proposed partial development of SHLAA site 690 (50 homes). The Steering Group put forward via the Neighbourhood Plan Questionnaire, all the known and available SHLAA sites on the Wiltshire Council SHLAA list for Hullavington. The community were asked which site/sites they would prefer to see developed over the plan period. The Hullavington community put forward SHLAA site 690 in its entirety as the 1st choice to provide new homes for the village. The Steering Group feel that the community should have the final say on whether all or part of any SHLAA site is put forward for development in the plan. The Steering Group will be presenting a Draft Plan to the community December 17.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1019	Consultee Mrs Malgosia Odell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125612		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		all		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		2. The Plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1020	Consultee Mrs Malgosia Odell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125612		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		all		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. The Plan is not effective because WC's examination of 'windfall', which is expected to provide 60% of new housing, is grossly inadequate – comprising one page out of 4,500 pages of the Plan documents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1021	Consultee Mrs Malgosia Odell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125612		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		all		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		4. The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes The centre of Trowbridge offers numerous opportunities to develop empty buildings and brown field land - if there are all these possibilities to breath life into the centre of the county town, do developers want to massacre precious green field sites. There are numerous alternatives to satisfy the need for housing and for developers to make a decent return.How can this be considered a 'sound plan'? Not at all on numerous levels.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1022	Consultee Mrs Malgosia Odell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125612		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Everything seems to be about the developer's bottom line these days - we are fighting a gross overdevelopment of the Halve Health Clinic, and this whole Hilperton Gap development, allbeit on a different scale and a wholly different site, yet again does not take in to consideration it's surroundings, the environment and infrastructure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1023	Consultee Dr Louis Lillywhite	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124313		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		all		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Any plan must also meet sustainable criteria - it should also be noted that the Atkins report (Annex 1 A.12 Westbury Community Area Remainder" states "The site falls within the visitor catchment of Salisbury Plain SPA. An appropriate assessment of the potential effects of recreational disturbance is required if the site is taken forward to any subsequent stage of the selection process."				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1024	Consultee Dr Louis Lillywhite	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124313		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury Community Area Remainder		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	More concerning is that the Council's assessment also raises concerns in the report on water and foul water infrastructure, which it acknowledges is already a problem for the village. The report includes a variety of other concerns which should be addressed prior to including the site in any draft strategy plan. In any case the assessment is for a maximum of 32 residential units (not 40) and even then indicates that this may have to be reduced to meet other reservations in the assessment..				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1025	Consultee Dr Louis Lillywhite	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124313		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury Community Area Remainder		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan is also inconsistent with the Council's own assessment of the housing needs for Bratton as being 8 houses instead of the 32 or 40 being proposed!</p> <p>Wiltshire Council should as a minimum address the issues in its own assessments and also show why the 40 houses it seeks to place on a single site in Bratton should all be grouped in such a concentrated manner on the single site it has identified; why it is proposing 40 when its own assessment is for 32 with the possible need for a reduction below this number as part of mitigation of other issues identified; and why even 32 are proposed when their own assessment is for 8; and also explain the discrepancies between the proposal for development at Bratton and their strategic objectives.</p> <p>It may be that after such a reassessment that the site might be suitable for a lesser number of housing. However, it is counter-intuitive for the Council, given the reservations in its own assessments, to rely on allocating a number of houses on the site when it knows from its own independent assessment that gaining planning agreement for such a large number is improbable.</p> <p>The plan appears to be based on a simplistic approach. It seeks to place a large number of houses in a location known to be available and indeed which was acquired by the owner, a builder, for development many years ago. Whilst there is some merit in using the site for development, even the Council's own contractor identified a maximum of 32 houses whilst noting that the number may have to be reduced. The Council's own assessment highlighted a number of sustainability problems,</p> <p>The assessment does not appear to have actively explored alternative sites. Presumption is meant to be given to infilling and there does appear to be council owned land available within the village. A site to the North of the village, previously used for mobile caravans would also suffer from fewer of the disadvantages of the current chosen site.</p> <p>In addition the number of houses proposed is significantly over the number as assessed by the Council's own recent Housing Survey and its recommendations and seems also to be based on a mis-appreciation of the number of houses in Bratton.</p> <p>The Council should explore the opportunity for infilling, using publicly owned land within Bratton, address the sustainability issues raised in their own (Atkins) survey and explore the potential for additional housing to be built to the North of the village which will not have an impact on the beauty etc of the adjoining White Horse ridge. ,</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I have had limited time to read the documents on the Wiltshire Web site; these are multiple documents spread over multiple web sites within the Council Web Site. I have had insufficient time to fully analyse these and will no doubt be better prepared should there be an opportunity to present at an oral hearing.				

Comment ID:	1026	Consultee Dr Louis Lillywhite	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124313		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury Community Area Remainder		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan does not seem to be in accordance with the Wiltshire Core Strategy, and in particular: It is likely to increase and not reduce the levels of out-commuting There are no current proposals for economic growth in the village area that justifies the need for future additional housing, whilst the Councils own survey demonstrates there is no existing growing population needs for such a development. The proposals do not safeguard the environment, and although the Councils own independent report suggests mitigation for some of the adverse impacts, it highlights others where future study is required to identify if mitigation is possible. The proposed development is outside the Settlement Boundary which according to 2.8 is "with limited exceptions, not acceptable" ,				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I have had limited time to read the documents on the Wiltshire Web site; these are multiple documents spread over multiple web sites within the Council Web Site. I have had insufficient time to fully analyse these and will no doubt be better prepared should there be an opportunity to present at an oral hearing.				

Comment ID:	1027	Consultee Dr Louis Lillywhite	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124313		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury Community Area Remainder		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst it is accepted that Settlement boundaries can be adjusted, this should only be if there is specific justification, which in the case of Bratton has not been shown.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1028	Consultee Dr Louis Lillywhite	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124313		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury Community Area Remainder		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The overall Wiltshire plan also appears to be arbitrary. It states that "no suitable sites were available at Large Villages in the South Wiltshire HMA", without demonstrating in detail why or how this conclusion is reached and suggests that allocation is based not on need but on some other unstated criteria, such as on the readiness of a landowner to make a site available. Evidence for this lies in 4.12 where it is stated that some large village sites were rejected (4.14) as "local housing needs for the plan period have already been accommodated". Just because Bratton has been assessed as needing 8 additional houses, proposing an additional 40 (or 32) is not consistent with excluding whole villages as their housing needs are less.</p> <p>The plan appears to be based on a simplistic approach. It seeks to place a large number of houses in a location known to be available and indeed which was acquired by the owner, a builder, for development many years ago. Whilst there is some merit in using the site for development, even the Council's own contractor identified a maximum of 32 houses whilst noting that the number may have to be reduced. The Council's own assessment highlighted a number of sustainability problems,</p> <p>The assessment does not appear to have actively explored alternative sites. Presumption is meant to be given to infilling and there does appear to be council owned land available within the village. A site to the North of the village, previously used for mobile caravans would also suffer from fewer of the disadvantages of the current chosen site.</p> <p>In addition the number of houses proposed is significantly over the number as assessed by the Council's own recent Housing Survey and its recommendations and seems also to be based on a mis-appreciation of the number of houses in Bratton.</p> <p>The Council should explore the opportunity for infilling, using publicly owned land within Bratton, address the sustainability issues raised in their own (Atkins) survey and explore the potential for additional housing to be built to the North of the village which will not have an impact on the beauty etc of the adjoining White Horse ridge. ,</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I have had limited time to read the documents on the Wiltshire Web site; these are multiple documents spread over multiple web sites within the Council Web Site. I have had insufficient time to fully analyse these and will no doubt be better prepared should there be an opportunity to present at an oral hearing.				

Comment ID:	1029	Consultee Dr Louis Lillywhite	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1124313		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Crossways, Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I also understand (but cannot find the reference on your site) that the area has been judged in a Suitability Assessment to have scored negatively in 9 out of the 12 criteria.</p> <p>The plan appears to be based on a simplistic approach. It seeks to place a large number of houses in a location known to be available and indeed which was acquired by the owner, a builder, for development many years ago. Whilst there is some merit in using the site for development, even the Council's own contractor identified a maximum of 32 houses whilst noting that the number may have to be reduced. The Council's own assessment highlighted a number of sustainability problems, The assessment does not appear to have actively explored alternative sites. Presumption is meant to be given to infilling and there does appear to be council owned land available within the village. A site to the North of the village, previously used for mobile caravans would also suffer from fewer of the disadvantages of the current chosen site. In addition the number of houses proposed is significantly over the number as assessed by the Council's own recent Housing Survey and its recommendations and seems also to be based on a mis-appreciation of the number of houses in Bratton. The Council should explore the opportunity for infilling, using publicly owned land within Bratton, address the sustainability issues raised in their own (Atkins) survey and explore the potential for additional housing to be built to the North of the village which will not have an impact on the beauty etc of the adjoining White Horse ridge. ,</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I have had limited time to read the documents on the Wiltshire Web site; these are multiple documents spread over multiple web sites within the Council Web Site. I have had insufficient time to fully analyse these and will no doubt be better prepared should there be an opportunity to present at an oral hearing.				

Comment ID:	1030	Consultee Mr & Mrs MS & Sheil Witt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126795	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road; North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are writing to lodge our objection to the building of 840 houses on Netherhampton Road.</p> <p>The only road leading into Salisbury is not able to take the traffic that is travelling along this road at present let alone over 1,000 extra cars.</p> <p>The Harnham Meadows was turned down and this was the correct decision because of extra traffic using the New Bridge Road, all this new traffic will be using the very same road.</p> <p>The proposed land that is going to be built on is water logged all winter.</p> <p>The present schools are full.</p> <p>The view into the city is of amazing beauty and once built on will be lost for ever.</p> <p>We do not need another Southampton road which is just a polluting traffic jam in and out of the city. Which is turning visitors and shoppers elsewhere, even with our park and rides, all this is not improving our wonderful city.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1031	Consultee Mr Paul Walker Person ID: 1126797	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury site allocations general			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Introduction This document represents a formal response by Go South Coast, trading as Morebus, Salisbury Reds and Tourist Coaches within Wiltshire regarding the above consultation. Go South Coast operates across the south coast with its core networks based in Poole, Salisbury, Eastleigh, Swindon and the Isle of Wight with smaller depots at Bournemouth, Swanage, Ringwood and Totton. With a fleet of over 800 vehicles across all brands, we help our customers make over 47 million journeys every year. Bus services are provided primarily through the route networks of more bus, Salisbury Reds, Thamesdown and Bluestar serving the Dorset, Wiltshire, Swindon and Southampton areas and Southern Vectis on the Isle of Wight. These networks are in the majority commercially operated but there is significant involvement in the tendered local bus market, together with school and college movements. The prestigious contracts to operate bus services for the University of Southampton - Unilink & Bournemouth University - UNIBUS are currently held, together with contracts for other higher education providers. We also have coaching operations running under the brands of Exelsior, Damory and Tourist Coaches as well as operating several National Express contracted services through Ringwood towards Gatwick, Heathrow and Central London. We aim to provide customers with the best experience possible when they travel with us. In order to achieve this we are constantly investing in our fleet and staying ahead of competitors with innovative onboard technology from free wifi to USB charging points, smart ticketing and cashless payments.</p> <p>Go South Coast have a history of working with the public and private sector partners on developing initiatives in new vehicle technology. Recently we have invested over £11.5m on 70 new vehicles with Clean Diesel VI engines reducing particulates from these vehicles significantly. We would make observations on the following policies:-</p> <p>Introduction We are keen to focus the quantum of development along existing transport corridors where possible or where development is concentrated where volumes can justify the provision of a bus service. Having higher concentrations in a place that already has established public transport links will allow this 'network' to grow for the benefit of all residents.</p> <p>Our main desire is to ensure that new developments are serviceable by all transport modes including the bus, and that developments are suitable for buses to access new development which can sustain viable commercial bus operation & reduce reliance on public subsidy once "kick-start" funding for new development ceases. This will make developments overall more sustainable environmentally and economically.</p>				

	<p>Existing congestion during extended AM and PM peaks mean network congestion is holding back the existing economy and the ability to build on this. Congestion is seen by business as a restrictor to growth. Surveys show that key indicators reveal that congestion is seen as an increasing issue by the population.</p> <p>In addition, over the last 50 years, bus journey times have increased by almost 50% in the more congested urban areas. If we had protected bus passengers from the growth in congestion there would arguably be between 48% and 70% more fare paying bus passenger journeys today. Already in London some buses on some routes run at close to walking speed. For the economy to flourish the bus needs to remain a viable alternative to the car for people accessing work and leisure and to penetrate main employment, leisure and shopping locations.</p> <p>Further, an independent report looked at the role of buses in contributing to economic growth, and quantifying the benefits bus services bring. ("Buses and Economic Growth", The Institute of Transport Studies, University of Leeds). The report, published in July 2012, shows:</p> <ul style="list-style-type: none"> • 1. Bus commuters help generate £64bn of economic output every year; • 2. Of the five billion bus journeys are made in the UK each year, one billion are made to work; • 3. People use the bus to make shopping and leisure trips with an annual value of £27.2bn, of which £21.5bn is spent in towns or cities centres; • 4. 1 in 10 bus commuters would be forced to look for another job if they could no longer commute by bus; • 5. More than 50% of students are frequent bus users and depend on the bus to get to their education or training.
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1032	Consultee Mr Paul Walker Person ID: 1126797	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury sites S1027 S1028 Netherhampton				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We would comment on the following site allocations in South Wiltshire.</p> <p>Site S1027 – North of Netherhampton Road Site S1028 – Land at Netherhampton Road We SUPPORT the allocation with AMENDMENTS.</p> <p>These sites are close to Salisbury Reds Route 5. This service operates half hourly Monday-Saturday daytime and hourly evenings and Sundays. Some parts of these sites lie within DfT guidance of 400m from existing bus routes, however, the vast majority of the sites do not. We are therefore unconvinced this site can be sustainable in bus operation terms which we would like to discuss with the site promoters and Local Planning Authority. The circular nature of the service towards its terminus means that the service would need to be amended to accommodate any additional development. The nature of development on either side of the Netherhampton Road would mean that whilst we generally do not like to "call in" at new developments and prefer to pass extremely closely by we would need to be able to call in to the southern and northern site so as to create a terminus turning point for these services.</p> <p>The size of the allocation also makes it unlikely that it will support key local facilities, such as a substantial district centre. The result is that, to a very great extent, any bus route created to serve this site would have to rely only on the new demand generated by the development itself. A combined site of site of 740 dwellings in terms of bus service operation is poor for service enhancement – indeed the site would need to be nearly ten times larger to support an additional bus commercially. This site is by its very nature on the edge of the settlement and any proposals would need to ensure good walking distances to bus provision, infrastructure and service level. The proposed level of developer contributions at £1,000 per house suggested in the viability assessment (Page 13 table 3.10.1) would therefore only yield a strategic site specific contribution of £740,000. This would not sustain a bus service for the amount of time it would need for seed funding to enable it to be commercially viable. If the development(s) were large enough to justify an extension, the road layout is such that to serve them, buses could be forced to operate two-way along Netherhampton Road and not enter the existing estates - this would detract from the existing customer base. Whilst both existing estates within 400m of the main road, the Richards Way / Middle St area is particularly badly designed and laid out in terms of walking routes to Netherhampton Road – this will need to be held in regard when considering the development of these sites and bus access.</p> <p>We note the statement at Para 5.37 (Community Area topic paper – Salisbury, page 20) that "A refresh of the Salisbury Transport Strategy can occur alongside a detailed Transport Assessment to address the sites traffic impacts. Measures in the current strategy may be brought forward and new ones identified. Measures necessary to enable development to go ahead appear capable of being delivered.....therefore a site specific viability assessment is necessary". We are concerned that the provision of school and highways works will mean the site is not catered for in terms of the delivery of sustainable transport initiatives. The current STS is silent on the issue of Netherhampton Road but does point to improvements a Harnham gyratory. It is therefore hard to see how the plan can guide sustainable transport provision at this location.</p>				

	<p>Indeed, it is noted within the Sustainability Appraisal (page P244/245) that the site will have an adverse effect on transport with measures that can be overcome – although no such measures are identified.</p> <p>Further, the sustainability appraisal text around transport states that the area is of high affluence with sites offering the potential for walking and cycling. The bus is not mentioned. This is surprising as within Salisbury there are pockets of deprivation and indeed the profile of elderly people (some of which may reside in this development) could be at risk of social isolation. In 2011, 19.5% of the population of Salisbury was of retirement ages (Source, Wiltshire Council, Census Data Tool, May 2013).</p> <p>The reference in this policy to prioritise education facilities and highway works further fetters the ability to the site to be sustainable in transport terms.</p> <p>It therefore seems appropriate that a suitable site specific S106 Developer Contribution to provide a service enhancement to the development would be appropriate to connect the residential area to locations accessible by bus. We would therefore welcome early discussions with the developer and LPA to look at how and over what timescale this development could come forward as the continued operation of commercial services in the area cannot be assured.</p> <p>In particular we would contend that the Policy should be AMENDED to include a reference to the development should provide a contribution to provide service enhancement for Salisbury Reds Service 5 and this should be reflected in a Site Specific Section 106 contribution for the site.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1033	Consultee Mr Marcus Lee Estate Manager	Agent Dr Thomas Roche Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Bowood Estate Person ID: 1124796	Rocke Associates Ltd Person ID: 1124792	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.28-4.33, Table 4.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>OBJECTION The provisions of Table 4.7 over-estimate the available supply of housing land in the period to 2026.</p> <p>The five year housing land supply has been tested through recent Appeals, and found to be considerably less favourable than the Council's estimates set out in Table 3.3 of Topic Paper 31. In the most recent Appeal decision relating to a site at Lynham2, following an Inquiry held in July 2017 and therefore shortly after the publication of Topic Paper 3, whilst the Inspector concluded that the Council could demonstrate a five year supply of deliverable housing land, he found it to be much less than the estimated 6.62 years for the North and West Wiltshire Housing Market Area adduced in the topic paper. The Inspector concluded there to be a supply equating to 5.11 years, possibly reducing to 5.05 years if a further 80 units at risk at the Rawlings Green strategic site in Chippenham were deducted. Moreover, whilst the Inspector accepted that there was not currently evidence of persistent under-delivery, and therefore a 5% buffer should apply to the calculation of the five year supply for the purposes of that Appeal, he cautioned that "... performance is not strong and there are worrying signs that the Council needs to address, particularly in the more recent years since adoption of the WCS where delivery has not met requirements"³.</p> <p>The Council's five year land supply relies significantly on delivery from large strategic sites, not least at Chippenham. The Inspector in the Lynham Appeal gave weight to the fact that they were allocated in a very recently adopted Plan (the Chippenham Site Allocations Plan), and that the issues raised in terms of matters which may delay delivery, in particular of the strategic site at Rawlings Green, were considered at the Examination and there was no significant evidence that would lead him to a different conclusion from the Examination Inspector. However, given that there are land ownership and infrastructure delivery issues that could potentially delay the delivery trajectory from strategic sites, and particularly that at Rawlings Green, there is a realistic prospect of slippage against the delivery trajectory. Given that the Council's five year land supply is marginal, the five year supply found to exist in August 2017 could easily and quickly fall into deficit.</p> <p>The above scenario is foreshadowed in Topic Paper 44 in which the Council holds as follows:</p> <p>It is difficult to predict rates of development with a high level of certainty because a number of issues can affect construction. Also, in Wiltshire, large mixed use sites ('strategic sites') are a significant component of land supply in each HMA and they can be complex and time consuming to deliver. Consequently, it is prudent to look beyond the required minimum to achieve a five year housing land supply and ensure a continuity of housing supply, as well to help ensure choice and competition in the market. (para. 1.5)</p>				

Levels of housing suggested for settlements and rural areas by the WCS are indicative in order to provide flexibility within each HMA. Figures are provided in the Area Strategy policies at the Community Area level as well as for the Principal Settlements, Market Towns and Local Service Centres in the South Wiltshire HMA. They are expressed as 'about' or 'approximate' figures and neither minimum nor maximums; instead they are an indication of the general scale of growth appropriate for each area and settlement during the plan period. (para. 1.7)

There are considerable uncertainties affecting the supply and development of housing. Forecasting supply over a decade cannot be exact. National policy anticipates that the Council will boost significantly the supply of housing and requires the Council to include an additional buffer over the need to demonstrate 5 years worth of housing land supply. The WCS sets requirements as a minimum amount of housing for each HMA. This all suggests planning for a generous supply of housing land, which is considered below. (para. 2.1)

The sustainable development of the County depends upon development being plan-led to manage environmental impacts, ensure economic growth and properly co-ordinate infrastructure provision. Developers commonly challenge the Council's approach to land supply in order to promote sites excluded from the development plan. This can create uncertainty around infrastructure provision and concern that less sustainable sites are being developed. (para. 2.2)

Therefore, to be sure of maintaining a five year housing land supply over each of the remaining years of the plan period, annual supply should exceed the five years and buffer required by planning policy. Any target level will be arbitrary but the Plan might look to provide at least six years of supply in each of the remaining years of the plan period (to allow for any possibility of under-delivery in future), but less where it can be safe to assume that reviews of the development plan will by then have brought forward additional site allocations to a point of sufficient certainty. (para. 2.3)

Whilst the Council contends in the topic paper that persistent under-delivery has not taken place in any of the County's HMAs and this view has been consistently supported at Planning Appeals, it accepts that it would be "... prudent to aim to have a 20% buffer"⁵.

It is therefore clear from the evidence base that the underlying strategy in preparing the WHSAP is to plan to exceed the WCS requirements at the most sustainable locations by up to 20%, and that this is not construed as being inconsistent with the WCS. It is an approach that has been endorsed in the preliminary findings of the Examination Inspector for the North Somerset Site Allocations Plan⁶. Following preliminary Examination Hearings in May 2017, the Inspector has advised the Council of the need to apply a 20% slippage allowance to the residual housing requirement having regard to the considerable reliance on large strategic sites which can fail to deliver at the anticipated rate, and in the context of less than ten years of the plan period (to 2026) remaining. In consequence, the Council has been required to allocate sites for an additional 2,500 dwellings beyond the housing requirement of the Core Strategy to provide greater certainty that the housing that is needed will actually be delivered during the residual plan period.

There are parallels in the current case given the Council's acknowledgement that large strategic sites are a significant component of the land supply, and in the context of a plan period that is more than half time expired at the time of preparation of a Plan that is to identify non-strategic housing allocations. Considered in the context of the above, and the parameters set for the WHSAP, its provisions are insufficient to meet its objectives.

In terms of the overall provisions for the North and West Wiltshire HMA, there is considerable reliance placed on unidentified windfall sites to deliver a substantial proportion (over 17%) of the residual requirement. This results in considerable uncertainty since there can be no assurances that sites will be brought forward to meet this element of supply. Past rates do not provide reliable evidence of future supply, particularly since settlement boundaries are only being adjusted to take into account commitments that have been commenced. This approach will not provide any additional windfall potential.

	<p>The advice in paragraph 48 of the NPPF requires ‘compelling evidence’ to demonstrate not only that windfall sites have ‘consistently’ become available in the local area, but also ‘will continue to provide a reliable source of supply’. No such compelling evidence has been provided. If the reliance on windfalls is removed from the balance, then the surplus for the HMA currently identified in Table 4.7 of the submission draft WHSAP, reduces to 624 (5% of the residual requirement).</p> <p>However, the surplus assumes that all commitments and proposed plan allocations will be implemented and deliver their full capacity during the Plan period. This is unlikely to be the case, and is not supported by evidence. Indeed, evidence from the recent Housing White Paper⁷ is that more than 30% of homes granted planning permission remain unbuilt after five years. If, as in North Somerset, a 20% non-implementation allowance is applied to the residual requirement to reduce the risks of the minimum requirement not being delivered during the short remaining term of the plan period, then the surplus turns into deficit of 1,804 homes in the North and West Wiltshire HMA. Even if a modest, and more realistic, windfall allowance of 5% of the residual requirement is permitted, then there remains a shortfall of more than 1,000 dwellings.</p> <p>The revised requirement for the North and West Wiltshire HMA incorporating the above adjustments is set out in revised Table 4.7 below: [refer to table in attached representation document]</p> <p>Therefore, following the Council’s own approach of applying a 20% buffer to increase land supply to a level at which delivery uncertainties can be accommodated, there is a need for additional site allocations to be made in the plan. Over-reliance on windfalls, as is currently the case with the Plan, simply compounds rather than accommodates uncertainties.</p> <p>REQUIRED CHANGES</p> <p>The following changes should be made to the Plan: Amendment of Table 4.7 of the submission draft Plan (HMA housing land supply 2006-2026) in accordance with Table 4.7 (Revised) set out in the foregoing submissions. Allocation of additional sites to accommodate the deficit, including the omission site at Wenhill, Calne identified in the representations below.</p>
Attached files (Please see Objective)	4712056
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The matters set out in the accompanying submissions relate to the site allocation strategy of the Plan and the adequacy of its provisions to meet the requirements of the Core Strategy. The changes sought may require consequential changes to other policies and provisions of the plan that are not the specific focus of these representations as set out in Section 3 above. Since the changes sought involve material change to the provisions of the WHSAP, and challenge the soundness of the plan in terms of adequacy of its provisions and approach, it is considered necessary to attend the Examination to assist the Inspector with his / her inquisitorial testing of its provisions to ensure that the DPD is ‘sound’ and will deliver the necessary development requirements during the plan period.</p>

Comment ID:	1034	Consultee Mr Paul Walker Person ID: 1126797	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	Salisbury site 3272 Land at Rowbarrow				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site 3272 – Land at Rowbarrow, Odstock Road We SUPPORT the allocation with AMENDMENTS. This sites is close to Salisbury Reds Route 1 on Oddstock Road to the west and X3 and Park and Ride 9 on Downton Road to the East. Salisbury Reds 1 connects Bemerton Heath, City Centre and Salisbury District Hospital every 10 mins daytime and half hourly in the evening. PnR 9 connects Britford and Park and Ride to the City centre and X3 connects from close to the site the City Centre, Fordingbridge, Ringwood, Royal Bournemouth Hospital and Bournemouth.</p> <p>Some parts of these sites lie within DfT guidance of 400m from existing bus routes, however, the vast majority of the sites do not. We are therefore unconvinced this site can be sustainable in bus operation terms which we would like to discuss with the site promoters and Local Planning Authority.</p> <p>We would require good walking routes through to an improved bus stop and shelter infrastructure (as set out below) on both Odstock Road and Downton Road Services with suitable pedestrian crossing facilities on Odstock Road.</p> <p>Highway Layouts at Development & Good Design</p> <p>Further, we would point to emerging guidance from CIHT which is currently being developed, and on which Go South Coast have been involved. The aim of the guidance is make development more bus friendly and support the development of commercially viable routes once a development is fully built out. Development should also promote quality development and quality bus provision that is attractive to users with improved access to main corridors, less deviations off route and that reduces potential delays with carriageway widths within new development a minimum of 6.75 metres.</p> <p>Moreover it is essential that if developments are to be made sustainable, public transport services are provided and funded from very early in the development to create transportation habits.</p> <p>We are keen to ensure a high quality bus stop with superior facilities that might be expected on a high quality bus corridor. A typical stop should be provided with: -</p> <ul style="list-style-type: none"> • Good bus stop design including real time passenger information display as set out above, printed timetable and service information, local map and way finding; • High visibility bus stop flag and pole with appropriate and consistent branding; • Interactive audio help points; • A Wi-Fi hotspot if public transport bus stop departure times can be accessed via mobile phones; • An enhanced maintenance regime to maintain the quality feel of infrastructure investment; • A higher kerb to reduce the step height between the bus and the footway, minimum 125mm; • Higher quality footway and carriageway paving materials; 				

	<ul style="list-style-type: none">• A stop cage marking of sufficient length to enable buses access close to the kerb. Minimum of 15m per bus if unobstructed (to cater for maximum likely vehicle lengths). <p>It is critical that any new infrastructure introduced to facilitate housing and economic growth is mindful of the public transport network and any new infrastructure should be designed to enhance rather than impede this. Engagement with bus operators on each development as planning applications are made is absolutely essential and we are more than willing to help shape developments and thus what infrastructure is required to facilitate commercial bus operation in the medium to long term after initial 'pump priming' using section 106 funds.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1035	Consultee Mr Marcus Lee Estate Manager	Agent Dr Thomas Roche Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Bowood Estate	Rocke Associates Ltd	Do you consider the draft WHSAP is sound?	No
Person ID: 1124796			Person ID: 1124792		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.28-4.29, Table 4.5			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The representations below set out the response of the Bowood Estate (BE) to the provisions of the Wiltshire Housing Site Allocations Plan (June 2017) (WHSAP). They set out the case for allocation of the omission site comprising land at Wenhill, South West Calne (SHLAA sites 709, 3311, 3312, 3251).</p> <p>The Bowood Estate has also made representations in response to the Regulation 16 Consultation on the Calne Community Neighbourhood Plan (CCNP). Given that the strategy of the latter plan is to allocate additional land beyond the requirements of the Wiltshire Core Strategy (WCS), the allocation of sites at Calne in the WHSAP to meet the requirements of the WCS would not conflict in any way with the provisions of the emerging CCNP since it is intended to exceed the 'indicative' 'minimum' provisions of the WCS for Calne.</p> <p>OBJECTION</p> <p>Objection is raised to the above provisions of the plan since they do not include the allocation of housing sites at Calne, and in particular the omission site at Wenhill, South-West Calne identified on the Plans at Annex 1, for housing and associated community benefits.</p> <p>For reasons set out in representations above, the Plan needs to make additional allocations to achieve its objectives to exceed the minimum housing requirements by a margin that will provide headroom for future under-delivery and therefore greater certainty of future supply. This is consistent with the NPPF objective to 'boost significantly' the supply of housing, and is also consistent with the WCS which identifies the housing requirement as a 'minimum'. It is also germane that the housing requirement in the WCS is below the Objectively Assessed Need for the area, as acknowledged by the Inspector in the recent Appeal decision at Lynham9.</p> <p>The additional requirement for the North and West Wiltshire HMA is for over 1,000 dwellings. Given that the WHSAP does not relate to Chippenham, the focus for the additional allocations must be at the other principal settlements within the HMA. Trowbridge is already the focus for non-strategic allocations in the WHSAP, in addition to the significant strategic allocations in the WCS. There is therefore a limit to which the market can accommodate and deliver additional housing beyond the existing allocations and commitments at that settlement.</p> <p>Aside from Chippenham and Trowbridge, Calne is one of the principal settlements in the North and West Wiltshire HMA. It is subject to neither strategic allocations, nor are non-strategic sites currently allocated in the submission draft WHSAP. Whilst a site of 250 dwellings is proposed in the emerging CCNP, the latter plan makes it clear that the allocations that it contains are 'in addition' to WCS requirements and will be brought forward where there are opportunities to deliver significant community benefits. Therefore, the allocation of a site, or sites, at Calne to meet WCS requirements is entirely consistent with both the WCS spatial strategy and the intentions of the CCNP to allocate sites beyond WCS requirements.</p> <p>As is acknowledged in the WHSAP evidence base¹⁰, WCS Core Policy 8 and supporting text identify specific issues to be addressed in planning for the Calne Community area, including, inter alia, "nonstrategic growth should be brought forward in accordance with Core Policy 2 and phased throughout the plan period to deliver homes in a balanced manner that will enable infrastructure and traffic congestion issues to be addressed"¹¹. Moreover, the Wiltshire Infrastructure Delivery Plan identifies specific 'essential' requirements that will need to be addressed in planning for the community area, including "support development of local primary care health facilities, which are expected to exceed capacity by</p>				

the end of the plan period”¹². Given that the WHSAP does not currently intend to allocate sites at Calne since it relies on existing commitments and windfalls, the ability to secure these ‘essential’ infrastructure requirements through the forward planning process is limited, particularly the development of local primary health care facilities.

The omission site at South West Calne is identified in the emerging CCNP as one of two sites that has the potential to offer community benefits. However, Land North of Low Lane is preferred in view of its perceived community benefit in terms of delivering a link road from Prince Charles Drive to Sand Pit Road. However, the preference for Land North of Low Lane did not take into account the very substantial community benefits that land to the south west can offer, and in particular the improvement to healthcare facilities through relocation of the Patford Street Surgery which is a recently identified requirement that can be accommodated on the omission site. Neither the requirement, nor the opportunity, were identified in the evidence base that supports the emerging CCNP.

The Community Benefits of Allocating the Omission Site at Wenhill, South West Calne

The full portfolio of community benefits that allocation of land at Wenhill, South West Calne can offer are summarised on the Concept Plan included at Annex 1 to these representations. They include:

New Healthcare Facilities: Provision of a new, expanded and comprehensive health care facilities incorporating relocation of the Patford Street Surgery and the District Nurses to bespoke, accessible accommodation supported by dedicated car parking.

Local Link Road via Bentley Lane: Creation of a potential new vehicular connection between Silver Street and the A4 via Bentley Lane which will ease congestion in the town centre at the existing Silver Street / London Road junction, in particular for traffic associated with the School and Leisure Centre.

Sustainably Located Homes: Delivery of up to 250 homes in a location that integrates well with the existing community and provides good accessibility on foot and by bicycle to the town centre, the town’s only Secondary School, the Leisure Centre and other key facilities, thereby easing traffic congestion.

Delivery of Affordable Housing: Delivery of much needed affordable housing / starter homes to meet high levels of demand. Further allocations of developable housing sites beyond the minimum WCS requirements are essential to addressing high levels of residual affordable housing needs.

New Green Routes for Pedestrians and Cyclists: Creation of green routes through the site and via a new permissive right of way for pedestrians and cyclists across Bowood Estate land connecting with Sustrans Cycle Route 403. This will provide new connections from Silver Street through the site and adjacent BE land, to the cycle route, thereby greatly enhancing connectivity for the new and existing communities on the south and south west sides of Calne. To the extent that it would encourage and facilitate travel by modes alternative to the car, it would further contribute to the strategic objective to ease congestion in Calne town centre.

Enhancement of (on-and off-site) Green Infrastructure: The proposed development will incorporate substantial new on-site green infrastructure. In particular, a substantial new open green space to the north west of Vernleaze, a Grade II* Listed Building. This will enhance public appreciation of both the heritage asset and the elevated views to the countryside to the west and north west. A smaller green space is also proposed centrally within the development, together with substantial landscaped margins to provide a soft green edge to the development that will facilitate both informal recreation and biodiversity enhancement and appreciation. Off-site enhancement of green infrastructure will include both the creation of a circular riverside walk to the north of Station Road and extension of the Castlefields Town Park (both listed separately below).

Circular Riverside Walk: Opportunity to provide a circular riverside walk to the north of Station Road connecting with Sustrans Route 403.

Extension of Castlefields Town Park: Opportunity to extend the Castlefields Town Park.

Wilts and Berks Canal Restoration: Opportunity to contribute to reinstating part of the Wilts and Berks Canal, a restoration project that is valued and championed by the local community.

Allocation of the omission site at Wenhill, South West Calne is therefore necessary to deliver not only much needed housing and affordable housing pursuant to WCS requirements, but also to bring forward essential community infrastructure that is necessary to support already committed growth at the town, and which therefore provides no opportunity to secure it. It will make a significant contribution to addressing both traffic congestion and infrastructure issues at Calne in accordance with the objectives of WCS Core Policy 8.

There is no facility for CIL-funding to be allocated to delivering the essential new health care facilities given that provision is not made for it in the Council’s Regulation 123 List. Moreover, a site has been neither allocated nor acquired for the delivery of such facilities. Given that the new primary health care facilities are required to support development during the current plan period, absent an allocation that can both provide the

	<p>necessary land and deliver them, there is little prospect of them being provided. This would fail to uphold the strategic objective of the WCS to bring forward development that will help secure the new community infrastructure.</p> <p>The allocation of the omission site at Wenhill, South West Calne is therefore in accordance with the WCS and would not prejudice the CCNP, the site allocation in which is intended to be additional to provisions that are required meet the strategic requirements. Moreover, the omission site was one of two preferred sites that emerged from several identified opportunities through the CCNP preparation process, albeit at that time the significant community benefits that could accompany its development, and in particular the delivery of new primary health care facilities, had not been identified.</p> <p>Given that the allocation of additional housing sites in the CCNP is premised on the delivery of community benefits, and that it is a strategic objective for new development at Calne to assist with delivering essential new health infrastructure associated with provisions for non-strategic growth, the potential to deliver comprehensive new healthcare facilities is a community benefit to which very substantial weight is properly given. It is an overarching strategic objective of the WCS to ensure that growth is accompanied by the provision of new healthcare facilities. Moreover, the need to expand the existing GP surgeries is a specific strategic objective for Calne that is identified in the WCS (para. 5.41) in recognition that existing surgeries are at or near capacity (para. 5.38).</p> <p>The WCS objective to deliver new healthcare facilities at Calne is reflected in the objectives set out for the CCNP, which include the encouragement of high quality and accessible, inter alia, medical provision for all residents in line with growth in the area (CCNP, para. 50). Notwithstanding the foregoing, the CCNP makes no provision for new healthcare facilities, and is therefore silent on where they should be accommodated. As such, the CCNP does not currently demonstrate how the strategic objectives of the Core Strategy are to be delivered. Given the requirement for additional housing land, and the WCS objectives to deliver new community infrastructure at Calne, and specifically new primary healthcare facilities, it is imperative that the WHSAP makes provision at Calne that can deliver the strategic community infrastructure requirements. Allocation of the omission site at Wenhill, South West Calne is therefore necessary both to meet housing requirements, and to deliver the specific strategic infrastructure requirements for the town that non-strategic housing allocations at Calne are intended to help secure.</p> <p>REQUIRED CHANGES</p> <p>Amend Policy H2 as follows:</p> <p>To include the allocation of the omission site at Wenhill, South West Calne, as identified on the Site and Concept Plans at Annex 1 to these representations, for residential development and new community infrastructure, to include provision of a new health centre with associated car parking.</p>
<p>Attached files (Please see Objective)</p>	<p>4712056</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The matters set out in the accompanying submissions relate to the site allocation strategy of the Plan and the adequacy of its provisions to meet the requirements of the Core Strategy. The changes sought may require consequential changes to other policies and provisions of the plan that are not the specific focus of these representations as set out in Section 3 above. Since the changes sought involve material change to the provisions of the WHSAP, and challenge the soundness of the plan in terms of adequacy of its provisions and approach, it is considered necessary to attend the Examination to assist the Inspector with his / her inquisitorial testing of its provisions to ensure that the DPD is 'sound' and will deliver the necessary development requirements during the plan period.</p>

Comment ID:	1036	Consultee Ms Lisa Bullock Town Planner (Western and Wales)	Agent	Do you consider the draft WHSAP is legally compliant?	
		Network Rail Person ID: 874600	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.1 Empress Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind I would strongly urge that when the council undertakes its viability testing for any proposed allocated site it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site. In particular the following allocated sites / policies will almost certainly have an impact on the level crossings listed below.</p> <p>Policy H1.1 Empress Way The following level crossings will be impacted: - Berrys – Public Footpath Crossing. This may be resolved by diverting the PROW over the proposed connecting highways link between Empress Way and Simonds Road. Details of the crossing can be found on our website http://archive.nr.co.uk/Transparency/LevelCrossingItemDetail.aspx?lcid=2354&name=Berrys&View=onList&postcode=&radius=</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p> <p>Level Crossings The level crossings which appear to be affected are listed above and give detail of the type of crossing.</p> <p>Any development which would result in a material increase or significant change in the character of traffic using these rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned by the impact the proposed site allocations would have on the safety and operation of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p>				

	<p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by development proposals:</p> <ul style="list-style-type: none"> By a proposal being directly next to a level crossing By the cumulative effect of development added over time By the type of crossing involved By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing By developments that might impede pedestrians ability to hear approaching trains By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing. <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by third party planning proposals which are further detailed in Appendix 1 attached to this email.</p> <p>It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings, not to increase risk, as could be the case with an increase in usage at the level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-</p> <p>(Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010) to requires that ... where a proposed development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".</p> <p>We would urge that information is provided within each policy to identify the need to either close the crossing and divert the public right of way or to improve the crossing, i.e. provision of a bridge. Any future proposals must be supported by a detailed Transport Assessment which assesses any potential impacts on the railway and detail any mitigation proposed.</p> <p>We would appreciate the Council's providing Network Rail with an opportunity to comment on any future planning policy documents as we may have more specific comments to make (further to those above). We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy.</p>
<p>Attached files (Please see Objective)</p>	<p>4712059</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1037	Consultee Mrs Cathy Titcombe Senior Admin Officer Salisbury City Council Person ID: 393725	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	Netherhampton Road, Salisbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Salisbury City Council Planning and Transportation committee recognises the need for a Wiltshire strategic housing strategy. However, there is concern that without the fundamental infrastructure as described then there will be an addition burden to our local roads. Therefore, should the developments within the strategy be approved, then SCC would request under a section 106 funds to support our amenities in order for the developments to be acceptable and to comply with the planning terms. The scale of these developments would put a considerable additional burden on SCC's resources with regards to amenities and services to all residents.</p> <p>The lack of a detailed Salisbury Transport Strategy. To date there is only a Summary dated November 2012 while the Salisbury Transport Strategy Refresh, which was promised last year, has not taken place. This would have given the opportunity to assess the transport impact of developments which have already taken place around the city and to come up with new ideas.</p> <p>It was agreed in the Core Strategy that to cope with the significant growth planned for the city and surrounding parishes that a radical approach to transport must be adopted to avoid overwhelming pressure on the road network and an unacceptable increase in air pollution. In spite of this development is going ahead without an adopted Transport Strategy.</p> <p>Green Infrastructure is key to achieving a major shift to sustainable transport, including walking, cycling and public transport. As set out in the Wiltshire Core Strategy "The Council will use its planning and transport powers to help reduce the need to travel particularly by private car by promoting sustainable transport alternatives". Cycling and walking routes linking existing and new developments to key destinations like schools, employment areas, leisure facilities, greenspaces and the countryside and connecting communities with each other must be a priority at the planning stage. One of the core planning principles set out in the National Planning Policy Framework is that the planning system should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in sustainable locations. The Department for Transport encourages Councils to develop Local Cycling and Walking Infrastructure Plans (LCWIPs) as part of the Planning process and incorporate these into Supplementary Planning Documents and Neighbourhood Plans.</p> <p>The large development of 740 houses on the Netherhampton Road in the draft plan can only be considered if the impact of traffic on the Harnham Gyratory is addressed and high quality GI is provided to encourage sustainable travel. SAGP have developed a plan for strategic routes around the city linking the major housing developments with key destinations, these routes, which follow desire lines, could be achieved by improving existing rights of way and creating some new traffic free routes. We believe this would provide the impetus needed for a shift in people's behaviour away from the private car and encourage active travel. We need a new approach to what is possible rather than retrofitting active travel onto an existing road network which is not fit for purpose. Consideration should not be given to further development on green field sites around the city without addressing the impact of traffic first.</p> <p>Access via Wilton Road will also be severely compromised particularly traffic travelling towards Wilton Town and Salisbury. In addition traffic will be further impacted during peak times as well as holiday traffic flowing through.</p> <p>Transport – the impact of further housing to the south of the city particularly on the Harnham gyratory needs to be assessed:</p>				

There is a lack of detail in the current Salisbury Transport Strategy, and this document has not been subject to a public consultation or formal adoption process. Furthermore there have been some very significant changes in proposed developments since work was undertaken in relation to this transport strategy.

The 'Salisbury Transport Strategy Summary' dated November 2012 suggests that development of Churchfields and Central Car Park will provide 1300 homes within the existing urban area [STSSum para 1.3] and it now seems unlikely there will be anything like this number [WHASAP para 4.66]. The Transport Strategy also worked on the basis that there would be 450 dwellings at Longhedge [STSSum Fig 1.1] whereas permission has now been given for 673 houses on this site [Planning application 13/00673/OUT, Option A]. Given the changes in the quantum and location of development the assumptions made in the Salisbury Transport Strategy – e.g. that there will be an additional 5,100 trips to the city centre in 2026 compared with 2008 [STSSum, para 5.2] – needs to be revisited.

There needs to be some clarity over whether the developments being proposed are for the numbers given in the Policy statement [WHSAP, Policy H3], or the SHLAA capacity which may be considerably higher e.g. 1195 houses at the Netherhampton Road site rather than 640 [see e.g. Salisbury Community Area Topic Paper, Table F.9, p. 64]. This is significant difference which will have a major impact on traffic generation and other infrastructure requirements, as well as on landscape and environment.

Even without any strategic sites planned to the south of the river, the Salisbury Transport Strategy assessed the Harnham Gyratory as being in the 'red' category – operating over 70% of capacity (or with two or more arms operating in excess of 90% of capacity). [STSSum, para 3.2 and Figure 3.2].

There has been no effective monitoring of the transport impacts arising from those developments around Salisbury which have already been completed, so it is not known whether the aspirations expressed in the Salisbury Transport Strategy have been fulfilled: "Implementing the transport strategy could ensure that 45% of these new trips to the city centre are made by sustainable modes in 2026. If the Salisbury Transport Strategy was not adopted (the business as usual approach), the forecasts show that only 20% would be by sustainable modes." [STSSum, para 5.3]

It is acknowledged that the transport impacts of the proposed developments have not been properly investigated – e.g. Draft WHSAP para 5.6 "Transport impacts from a proposal will also need detailed assessment in order to accord, in particular, with Core Policy 62 (Development Impacts on the Transport Network)." It is stated that "refreshing the Salisbury Transport Strategy will allow the effectiveness of existing measures to be reviewed and propose new ones to accommodate growth." [WHASAP, para 5.128] Mitigation measures are mentioned [WHASAP, para 5.136] however it could be the case that the combined transport impact of the developments to the south of the City places an unacceptable burden on the road network. The National Planning Policy Framework states that development should be "prevented or refused on transport grounds where the residual cumulative impacts of development are severe" [NPPF, para 32] and that may be the case in this instance. Appropriate green infrastructure can provide pleasant walking and cycling routes away from traffic congestion on busy main roads. As Salisbury expands there needs to be a major shift from car dependent life styles towards more active travel modes and this can only be achieved if a comprehensive Green Infrastructure Strategy for the settlement is developed in parallel with a Salisbury Transport Strategy. These need to be seen as basic and necessary prerequisites linked to the development of strategic housing and employment sites.

Para. 5.136 This paragraph provides grossly insufficient information regarding how the road network can/will be modified to manage what is recognised will be significant increases in road traffic. In the absence of a road traffic plan and costings the overall plan is flawed.

A fully detailed road traffic plan is required prove that the local road network can be adapted to cope – it is not sufficient to articulate the significant barrier without a detailed, costed plan within the draft plan.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1038	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Section 106 funds to support our amenities			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Should the developments within the strategy be approved, then SCC would request under a section 106 funds to support our amenities in order for the developments to be acceptable and to comply with the planning terms. The scale of these developments would put a considerable additional burden on SCC's resources with regards to amenities and services to all residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1039	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Chapter 5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SCC would highly recommend all new developments within the Wiltshire Housing Site Allocation Plan to adopt The Healthy New Towns programme which aims to put health at the heart of new neighbourhoods and towns across the country. With Britain losing 140 million working days to ill-health each year and the cost to the NHS of diabetes already at £10billion a year, the programme can have a real health and financial impact while delivering on key aims set out in the Five Year Forward View. A minimum in supporting reducing Obesity and to improving health living would be the provision of a 'Trim Trail.'				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1040	Consultee Mrs Cathy Titcombe Senior Admin Officer Salisbury City Council Person ID: 393725	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Lack of a green infrastructure strategy			Do you consider the draft WHSAP is sound?	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The lack of a Green Infrastructure Strategy (GI). Although there are frequent references to a GI Strategy in Wiltshire Core Strategy, Core Policy 52 this ‘remains in preparation’ with, as far as we know, no progress towards consultation or formal adoption. Without these two fundamental and interlinked strategies it would seem impossible to assess the impact of further development as proposed in the Housing Site Allocation Plan. In view of the lack of a County wide GI Strategy SAGP have been working on developing a local GI Strategy for the Salisbury Area. The Connectivity Group have surveyed and mapped all linear routes – rights of way, tracks, roads without footways and desire lines. This has enabled us to identify the gaps and missing links.</p> <p>Much of the new housing, already built or proposed in the current Housing Allocations Plan, lies outside the Salisbury Community Area but greenspace and green infrastructure, the network of footpaths and cycle ways, must inevitably cross community boundaries; which highlights the importance of cross-boundary working. There appears to be no mention of how this issue will be addressed.</p> <p>Green Infrastructure is key to achieving a major shift to sustainable transport, including walking, cycling and public transport. As set out in the Wiltshire Core Strategy “The Council will use its planning and transport powers to help reduce the need to travel particularly by private car by promoting sustainable transport alternatives”. Cycling and walking routes linking existing and new developments to key destinations like schools, employment areas, leisure facilities, greenspaces and the countryside and connecting communities with each other must be a priority at the planning stage. One of the core planning principles set out in the National Planning Policy Framework is that the planning system should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in sustainable locations. The Department for Transport encourages Councils to develop Local Cycling and Walking Infrastructure Plans (LCWIPs) as part of the Planning process and incorporate these into Supplementary Planning Documents and Neighbourhood Plans.</p> <p>Lack of a green infrastructure strategy</p> <p>A Wiltshire Green Infrastructure Strategy is considered fundamental to Core Policy 52 in the Wiltshire Core Strategy, see para 6.90 (& others): 6.90 The Wiltshire Green Infrastructure Strategy will define Wiltshire’s existing green infrastructure network , and provide the long term vision, objectives, policy framework, and delivery plan for the enhancement of the network.... The strategy is currently in preparation and will be delivered through a partnership of key stakeholders and individuals (Wiltshire Green Infrastructure Partnership). The council will take a key role in the preparation and delivery of the strategy, and Core Policy 52 will be delivered in line with the emerging strategy.</p> <p>‘Core Policy 52 - Green infrastructure’ makes reference to the delivery of the Wiltshire Green Infrastructure Strategy as part of development, however progress towards producing a Green Infrastructure Strategy appears to have stalled. A 9-page “Wiltshire Green Infrastructure Strategy update” was produced (dated January 2012), however there is still no adopted Green Infrastructure Strategy. One of the questions being asked in the Wiltshire Housing Site Allocations Plan Sustainability Appraisal, in connection with SA objective 7 is “Will the development site... 2. Aid in the delivery of a network of multifunctional Green Infrastructure, in line with the Wiltshire Green Infrastructure Strategy?” It is hard to see what this question means if there is no adopted Green Infrastructure Strategy, and the answer in all cases seems to be that the site “could offer the</p>				

	potential to deliver Green Infrastructure”, which does not provide the specifics which are required for each individual site. [see Q&A in Annex 1 A6 in respect of Salisbury sites] Appropriate green infrastructure can provide pleasant walking and cycling routes away from traffic congestion on busy main roads. As Salisbury expands there needs to be a major shift from car dependent life styles towards more active travel modes and this can only be achieved if a comprehensive Green Infrastructure Strategy for the settlement is developed in parallel with a Salisbury Transport Strategy. These need to be seen as basic and necessary prerequisites linked to the development of strategic housing and employment sites.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1041	Consultee Mrs Cathy Titcombe Senior Admin Officer Salisbury City Council Person ID: 393725	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury Air Quality Management Area			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Air Quality – related to (1) above, the impact on the Air Quality Management Area (AQMA) in Salisbury needs to be assessed, given the additional traffic which will be generated particularly to and from the south of the City.</p> <p>One of the places where air quality monitoring within the Salisbury AQMA is undertaken is in Exeter Street. The latest published data for this and other sites is in Wiltshire’s Annual Status Report for 2016 available at http://www.wiltshireairquality.org.uk/assets/documents/council-reports/Wiltshire ASR final draft 22nd July.pdf</p> <p>This shows that the annual mean bias adjusted reading for diffusion tube site P15/49 at 91 Exeter Street was 41µg/m3, already above the EU limit of 40µg/m3 without the additional traffic which is being proposed.</p> <p>Developments which resulted in further breaches of the EU limits in the AQMA would be contrary to national planning policy which states that “Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.” [NPPF para 124]</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1042	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Green field rather than brown field sites – new green field sites to the south of Salisbury have become targets for major development due to delays in bringing forward more central, and more sustainable, brownfield sites in Salisbury. One of the core planning principles in the NPPF is to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value” [NPPF, para 17]. There is also protection in the NPPF for high quality agricultural land: “Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.” [NPPF, para 112] There needs to be a better explanation as to why housing planned for brownfield sites such as the Maltings and the Engine Shed site is being delayed. The general decant issues which are mentioned for Churchfields do not apply to the Engine Shed location, which is already vacant and under the ownership of Wiltshire Council.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1043	Consultee Mrs Cathy Titcombe Senior Admin Officer Salisbury City Council Person ID: 393725	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Chapter 4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Housing Site Allocations Plan cannot be effective because of the spread of a single settlement like Salisbury across multiple community areas and parishes. The fact that so many new houses in the ‘settlement’ of Salisbury are being built or planned outside the boundary of Salisbury Community Area is not fully explained, nor are the complexities of this situation adequately covered. Community Areas are considered fundamental to delivering the Wiltshire Core Strategy, with plenty of references to support this, e.g. “Coordinating strategies and plans around the established Community Areas is central to Wiltshire Council and its partners’ commitment to empowering local people to have a greater role in what happens in their local communities. The Core Strategy includes a strategy for each of the Community Areas of Wiltshire, setting out how it is expected that these areas will change by 2026, and how this change will be delivered. Aligning the Core Strategy with the Community Areas in this way offers the opportunity for place shaping to be embedded within the local community and the benefits of development to be realised at a local level.” [WCS 1.18]. The fact that Salisbury’s settlement is not aligned with the Community Area is raised as an issue in para 5.112 of the Wiltshire Core Strategy: “5.112 Specific issues to be addressed in planning for the Salisbury Community Area include: the administrative boundaries around the city have led to a large proportion of the development allocations in this Core Strategy being located outside of the boundary of the city. Some are, for example, located on new greenfield sites in the adjoining parishes which are within the Southern Wiltshire and Wilton Community Areas. These allocations are, however, considered to contribute towards the requirement for housing and employment for Salisbury and are included within this Salisbury Area Strategy.” However there is no mention of what is going to be done to address the issue which has been identified, and this issue can only get worse as the proportion of housing technically ‘inside’ the settlement of Salisbury but in reality outside the Community Area grows. It is suggested that whenever housing numbers for ‘Salisbury’ are quoted they should be disaggregated by Community Area so this issue is made explicit. e.g. Draft WHSAP Tables 2.3, 4.11, 5.4, para 5.127 etc Salisbury CA Topic Paper para 2.2, Table 2.2 etc Turning to a specific example – it is proposed that a Settlement boundary is being drawn around Old Sarum & Longhedge housing. This it seems is part of the settlement of Salisbury (going on housing figures quoted, and confirmed by officers at the public exhibition in Salisbury on 19/7). However this settlement is not continuous with Salisbury, which conflicts with Core Strategy para 5.2 – “Where Principal Settlements and Market Towns are referred to, it should be noted that reference is being made to their continuous urban areas that may be within more than one parish area. Similarly, there are places, notably Chippenham, Salisbury and Trowbridge, where the continuous extent of their existing urban areas and/or proposed urban extensions, fall within more than one Community Area.”</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1044	Consultee Mrs Cathy Titcombe Senior Admin Officer Salisbury City Council Person ID: 393725	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.69			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	it is proposed that a Settlement boundary is being drawn around Old Sarum & Longhedge housing. This it seems is part of the settlement of Salisbury (going on housing figures quoted, and confirmed by officers at the public exhibition in Salisbury on 19/7). However this settlement is not continuous with Salisbury, which conflicts with Core Strategy para 5.2 – “Where Principal Settlements and Market Towns are referred to, it should be noted that reference is being made to their continuous urban areas that may be within more than one parish area. Similarly, there are places, notably Chippenham, Salisbury and Trowbridge, where the continuous extent of their existing urban areas and/or proposed urban extensions, fall within more than one Community Area.” As a general point, where a settlement extension is not within the community area or parish of the settlement there needs to be an explanation of the mechanism whereby infrastructure which the settlement may require to support that development gets identified and delivered.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1045	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is proposed that a Settlement boundary is being drawn around Old Sarum & Longhedge housing. This it seems is part of the settlement of Salisbury (going on housing figures quoted, and confirmed by officers at the public exhibition in Salisbury on 19/7). However this settlement is not continuous with Salisbury, which conflicts with Core Strategy para 5.2 – “Where Principal Settlements and Market Towns are referred to, it should be noted that reference is being made to their continuous urban areas that may be within more than one parish area. Similarly, there are places, notably Chippenham, Salisbury and Trowbridge, where the continuous extent of their existing urban areas and/or proposed urban extensions, fall within more than one Community Area.”</p> <p>There also seems to be a conflict with Core Policy 3, Infrastructure requirements – which the policy says will be delivered by “...liaison through the area boards with town and parish councils and appropriate local stakeholders to identify community infrastructure requirements”</p> <p>Wiltshire Council’s Statement of Community Involvement encourages pre-application discussions, particularly for major applications, when it is suggested that Community Area boards may be an appropriate forum for discussion and that parish/town councils should be involved [SCI, para 5.27/5.28]. For the example of Longhedge, where 673 houses are being developed within the settlement of Salisbury but outside Salisbury community area and in the parish of Laverstock and Ford, the Statement of Community Involvement for planning application 13/00673/OUT mentions dialogue with the local WC member (who sits on WC Southern Area Board) and various discussions with Laverstock and Ford Parish Council. Pre-application discussions are not recorded as having involved Salisbury Area Board or Salisbury City Council despite the impact this development will have on the settlement of Salisbury. This is a major concern not least because the pre-application stage should provide the opportunity for necessary infrastructure, such as sustainable transport links between a development and the settlement of which it forms part, to be discussed and agreed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1046	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	S61 Hilltop 10 homes, way seems acceptable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1047	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3272 Rowbarrow 100 homes, seems acceptable although consideration to infrastructure improvement should be written in to improve safe pedestrian access across Odstock Road for access to the open fields and park land to the south.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1048	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3272 Rowbarrow 100 homes, seems acceptable although consideration to infrastructure improvement should be written in to improve safe pedestrian access across Odstock Road for access to the open fields and park land to the south. Site must also include suitable park areas for toddlers and for young children and a separate park for older children.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1049	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		S1027 North of Netherhampton Road 100 homes, any development here must include improvements to include pavements wide enough to include a cycle way along Netherhampton Road that extends on the north side to meet up with current roads and pavements to the east and also run parallel to the west as far as the limit to the proposed S1028 site. With both sites S1027 and S1028 taken in conjunction and the possibility of developing a Primary school and other community facilities within S1028 site a safe pedestrian crossing point will be required across Netherhampton Road. As this side of the City is being increased further improvements are required for pedestrian and cycle connectivity via significant improvement to the “Broken Bridges” footpaths to include suitable hard surfaces, drainage solutions where required and street lighting. There could also be a footpath placed across Waldron’s Farm and a link footbridge placed into the south west corner of Churchfields industrial estate if the farm owner is agreeable and a link bridge found acceptable.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1050	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	S1027 North of Netherhampton Road 100 homes, ... Site must also include suitable park areas for toddlers and for young children and a separate park for older children.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1051	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	S1027 North of Netherhampton Road 100 homes, [...]Whilst this site borders a flood plain, request that additional measures are put into place to reflect the impact of the area being developed and the additional impact of the S 1028 development area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1052	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		S1028 South of Netherhampton Road 640 homes, any development here must include improvements to include pavements wide enough to include a cycle way along Netherhampton Road that extends on the south side to meet up with the road access at the Garden centre. Support the inclusion of Primary School and other community facilities within the site. With both sites S1027 and S1028 taken in conjunction and the possibility of developing a Primary school and other community facilities within S1028 site a safe pedestrian crossing point will be required across Netherhampton Road. As this side of the City is being increased further improvements are required for pedestrian and cycle connectivity via significant improvement to the “Broken Bridges” footpaths to include suitable hard surfaces, drainage solutions where required and street lighting. There could also be a footpath placed across Waldron’s Farm and a link footbridge placed into the south west corner of Churchfields industrial estate if the farm owner is agreeable and a link bridge found acceptable.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1053	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	S1028 South of Netherhampton Road 640 homes, [...] Support the inclusion of Primary School and other community facilities within the site. S1028 South of Netherhampton Road 640 homes, this area is lacking a doctors surgery and it currently only has one local shop which includes a post office. The school is, and has been overcrowded for several years and more residents in the area will only serve to exacerbate an already significant issue.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1054	Consultee Mrs Cathy Titcombe Senior Admin Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury City Council Person ID: 393725		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	S1027 North of Netherhampton Road 100 homes [...] Whilst this site borders a flood plain, request that additional measures are put into place to reflect the impact of the area being developed and the additional impact of the S 1028 development area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1055	Consultee Mrs Angela Mitchell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126811	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I strongly object to any further development of the Ridgeway Farm Site beyond the 10 houses already under construction.</p> <p>1) There have already been over 60 houses built in the village since 1980 with no improvement to any of the utilities.</p> <p>2) The access to Ridgeway Farm is dangerously narrow and the path to the Village Hall and plying field is clearly going to be very narrow and no help to getting to The Street (A429) where the buses run and the school is situated.</p> <p>3) The plan to use the public footpath across the fields is ridiculous as no-one is going to take their children to school across wet muddy fields occupied half the year by cattle with the inevitable mess they leave behind. Last summer the cattle were cows with calves at foot - potentially very dangerous and a bull.</p> <p>4) In the 36 years I have lived here there have been several incidences of flooding including one in 2007 when a large number of properties in several different parts of the village were under water.</p> <p>5) The foul drains are inadequate with raw sewage running down Tetbury Lane following heavy rain now. This is partly due to flow back from the main drain which runs along the A429. That drain flows back up the pipes to houses in the Butts so that house holders have had to have valves fitted. The engineer from Wessex Water said that the size of the main drain should be double its size to cope with the existing extra housing built since it was laid.</p> <p>6) The excellent school is already over-subscribed and has lost some of its green space to extra class-rooms so with Government campaigning to fight obesity in children by encouraging sport in school it would be a travesty to take any more field for building extensions.</p> <p>7) Policy 1 of Wiltshire's Core Strategy is that housing in villages will be built to meet need but there is no need in Crudwell as there is no employment and an inadequate public transport system to get to any.</p> <p>8) There is already 2,200 over supply in N Wiltshire.</p> <p>This is not NIMBY-ism but my objections are real and concrete. There is shortly to be published a Village Plan which must be adhered to.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1056	Consultee Felicity Gilmour Person ID: 1126818	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to oppose the above development for the following reasons:</p> <p>Boundary issues The Council is proposing to move the current town boundary from Church Lane to the Lambrok stream. This proposal aims to justify development on the above site. In 1996, as part of the West Wiltshire District Plan, this site was identified as part of the 'local rural buffer' between Trowbridge and Southwick. Development on this site was rejected and the land subsequently sold as agricultural land. The proposed boundary change is clearly 'developer-led' and simply aims to justify building on this land.</p> <p>Transport issues Development on this land will require access from the A361, a very busy main road. This will add to the already heavy traffic into and out of Trowbridge on this route and increase the traffic congestion at peak times. Walking into town does not currently appear to be an option for most. I walk in occasionally and it is already an unpleasant experience. Heavy traffic causes pollution, particularly at crossings/traffic lights, and in queues, and there is an ever-increasing number of heavy lorries which appear to use the Frame Road as a route through the town. The distance of this proposed development from the centre of Trowbridge, and the limited public transport options, mean this development will result in increased traffic movements along the Frame Road and an increase in air and noise pollution. An increase in traffic flow will further deter walking and cycling modes of travel.</p> <p>Environmental and landscape issues The proposed development is adjacent to Southwick Country Park. When the Country Park was initiated in 1996, part of its remit was as a Nature Reserve and the Park is currently applying to be redesignated as a Local Nature Reserve. Maintaining the 'rural buffer' would improve the overall environment for wildlife. It is difficult to see how homes built on this site can be integrated into the existing development as this would mean destroying ancient hedgerows and trees which the Council acknowledges need to be maintained and improved to provide areas for foraging bats and other wildlife.</p> <p>Infrastructure issues There has been very little recent development on the south-west side of Trowbridge and the infrastructure is not in place to cope with increased urbanisation. Apart from roads which I have mentioned above, there are no doctors' surgeries in the vicinity and those we have in Trowbridge are very busy. There is a shortage of Secondary School places which is acknowledged by the Council but there seem to be no immediate plans to resolve this issue.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	1057	Consultee Mr G Gaiger Gaiger Bros Person ID: 394670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5 West Lavington Settlement Boundary		Positively prepared	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>(1) Positively Prepared</p> <p>1.1 The 'remaining' objectively assessed development requirements are inaccurate- being based upon anticipated housing sites which will simply not deliver the required housing over the Plan period within the Devizes Community Area. Issues preventing the deliverability of sites which have been 'counted' as identified within the Devizes Area Neighbourhood Plan, are set out in (3) below. Consequently, the strategy, which seeks only to just about meet this need, is flawed.</p> <p>1.2 Paragraph 47 of the NPPF requires 'To boost significantly the supply of housing, local planning authorities should:</p> <ul style="list-style-type: none"> • use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.' <p>It promotes a positive presumption in favour of sustainable development as the 'golden thread' which runs throughout the document.</p> <p>1.3 The 2500 new homes required to be delivered over the Plan period in the Devizes Community Area are based on minimum housing targets. These figures were the eventual minimum housing figures after they were notably increased following scrutiny by the Inspector examining the Wiltshire Core Strategy. That Inspector made it clear that these were to be minimum housing targets, and that delivery of sustainable development over and above these figures was appropriate.</p> <p>1.4 Conversely, the draft WHSAP documents express the housing figures as 'about or approximate and neither minimums or maximums'. This does not represent positive preparation which will promote a presumption in favour of sustainable development nor will it significantly boost the supply of housing at these Large Villages. Settlements such as West Lavington and Littleton Panell offer a wide range of facilities and services and are a location where new housing sites of a suitable scale, should be identified in the interests of meeting the 'full, objectively assessed housing needs'.</p> <p>1.5 Moreover, the approach taken by Wiltshire Council, will not deliver the objectively assessed affordable housing needs. Indeed, in view of the current national thresholds for affordable housing, many villages avoid any housing sites with development below those thresholds. It will mean that very little if any affordable housing will be provided within the Large Villages and the affordable housing needs will not be met either within these villages or within the Devizes Community Area as a whole. Affordable housing being of course, a key issue in this area, especially within the desirable Large Villages, where house prices are at a premium and on average, are c. 9-10 times average incomes.</p> <p>1.6 The draft WHSAP suggests that delivery of affordable housing here will be achieved through the Neighbourhood Planning process (which seems unlikely due to the small scale of sites being identified as set out above) and through exceptions policy CP44. The latter has historically been an extremely poor mechanism for on site delivery, as many landowners simply bank their sites in the hope they will achieve open market housing in the future. It is clear that affordable housing need outside of the main settlements will not be delivered in this way and a planned approach is required through the allocation of some larger sites within the Large Villages.</p>			

	<p>1.7 Specifically, we would suggest that sites, such as Land off Lavington Lane at West Lavington, which are well supported by the community, and are of a scale which will deliver the range of housing needed by the parish, together with other community benefits such as a second access and much needed parking to access the primary school should be given further consideration for inclusion by the Council, in order to help meet the objectively assessed housing and affordable housing need and help support the village's facilities and services.</p> <p>1.8 As set out at below at 1.10, sustainable sites within the Large Villages which have the propensity to deliver a range of community benefits including by making a meaningful contribution to both the OAHN (including affordable housing need) should not be disregarded simply because the Council may feel it has met its minimum duty. Effectively, by omitting such sites from the site allocations process, communities (and developers) are 'penalised' simply because the parish council are unable or unwilling to engage with the Neighbourhood Planning process or are not in a position to see it through to conclusion. We do not therefore agree that this is a robust approach to the requirement that such plans should be 'positively prepared'.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1058	Consultee Mr James Mitchell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126831	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I hereby object to any increase in the number of houses to be built at the Ridgeway Farm site in Crudwell.</p> <p>Wiltshire Councils Core Strategy clearly states that development in villages will only be to meet need. There is no employment in Crudwell and no efficient transport to centers of employment so no "need".</p> <p>An increase of 50 dwellings in total would increase the size and needs of Crudwell by 20% and those needs could not be met. There is an over-supply in both Malmesbury Community Area and an over-supply of around 2,200 houses in North and West Wilts. These houses are clearly not needed.</p> <p>Crudwell is about to publish a Neighbourhood Plan where any potential for any further housing will be fully researched.</p> <p>There has been severe flooding in the area and there are continually problems with the inadequate main sewer with raw sewage running down Tetbury Lane after heavy rain and flow-back into houses along the Street making valves necessary.</p> <p>Crudwell Primary School is over-subscribed and there is no room for any further extension of the buildings without taking away large areas of vital playing field space.</p> <p>Tetbury Lane is narrow and there is no way of putting in a footpath down to the bus route on the Street and the school. The idea that anyone is going to use a muddy path across fields occupied by cattle to get their young children to school is ludicrous.</p> <p>There is clearly no need for that much housing increase in Crudwell and the Neighbourhood plan will look into this and find out the wishes of the community and environmental constraints to cover any small shortfall.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1059	Consultee Mr G Gaiger Gaiger Bros Person ID: 394670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A5 West Lavington Settlement Boundary				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>(2) Justified</p> <p>1.9 The strategy is not ‘the most appropriate’ as it leaves open to chance the delivery of any housing in the Large Villages. Only those parishes which can ‘agree’ and are sufficiently well resourced in terms of time, expertise and money will be in a position to deliver Neighbourhood Plans. This is unjust and does not support the objective to deliver the much needed and significant boost in housing supply advocated by the NPPF.</p> <p>1.10 Many of these Large Villages are reliant upon growth to maintain their current level of facilities and services, including local schools, shops and public houses. West Lavington and Little Panell is no exception to this, having lost two public houses within the last 7 or so years. It is keen for a modest level of growth to support the remaining public house, doctor’s surgery, primary and secondary school (in neighbouring Market Lavington) and village shop and, having such easy links to adjacent Market Lavington, new housing here would inevitably also help support this Local Service Centre. The next two paragraphs are taken from West Lavington’s housing site allocations work relating to the NP ‘Need to support local schools and services</p> <p>This is an important issue for local people. Wiltshire Council have informed us that Dauntseys Academy Primary School has spare places in a number of year groups and that the birth rate in the catchment area is declining. Their formula for estimating demand arising from new development suggests that some 50 new houses could generate demand for up to about 14 new primary school places which they believe could be accommodated. Demand for additional places at Lavington Secondary School may require contributions to fund a small expansion.</p> <p>Local commercial services, shops and pubs, would undoubtedly benefit from an increase in local trade whilst the community would benefit from an increase in younger people into the village.</p> <p>Need to provide suitable housing for growing families</p> <p>A large number of houses in the village, including quite a large proportion of newly built housing on infill or small developments, are of a size and standard which attracts a price that is too high for most younger families. A mixed development that provides a choice of small to medium family housing at competitive prices is only likely to be achieved on a medium sized site.’</p> <p>1.11 As an alternative, we submit that site allocations should be considered and made in the Large Villages, especially where there is a strong level of community support such as the land off Lavington Lane site in West Lavington, which is well advanced through the site selection Neighbourhood Plan process. The NP had however, then stalled due to lack of finances.</p> <p>1.12 In this respect, it is notable that of the 67 Large Villages consulted across Wiltshire, only 13 (of 39 responding parishes) said they were preparing NP’s which included housing development. It is likely that these responding parishes were also those which are more organised/ better</p>			

	resourced Parish Councils, thereby indicating a very high proportion of large villages will not be able to deliver any housing or affordable housing in this way.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1060	Consultee Mr G Gaiger Gaiger Bros Person ID: 394670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		A5 West Lavington Settlement Boundary		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>(3) Effective</p> <p>1.13 The Draft WHSAP would not be deliverable over the Plan period. The following list identifies site allocations made within the Devizes Community Area which are those identified by the Devizes Area Neighbourhood Plan over which there are known major questions over their deliverability or discrepancies over the figures relied upon. These show that of the 364 new homes included for delivery over the period 2014-2026, at least 84 of these would be highly unlikely to be built and should not be included within the pipeline. Consequently, we submit that the evidence base for Devizes (and as a result, the Devizes Community Area) is significantly out of date; sufficient so as to call into question the deliverability of the OAHN. To rely on such a flawed evidence base, with an insufficient contingency even to cover the known issues with currently identified sites, results in a draft Plan which will not be effective as it will not deliver OAHN (including affordable housing).</p> <p>1.14 Furthermore, it calls into question both the deliverability of other sites across other Community Areas, and the resulting 5 Year Housing Land Supply, which, again we would submit requires a greater contingency given the barriers already identified to delivery the identified site allocations. This issue is confirmed in 1.5 of Topic Paper 4 which sets out that 'It is difficult to predict rates of development with a high degree of certainty because a number of issues can affect construction...'. It would therefore be reasonable to include site allocations at the Large Villages to allow for a greater contingency and ensure delivery of sufficient housing rather than basing a site allocations on 'minimum' housing targets at sites which are unlikely to be delivered.</p> <p>1.15 As such, we submit that it would be prudent to reconsider the deliverability of the 'existing' site allocations and to give consideration to site allocations at sustainable sites, such as those offered at Large Villages, like the Land off Lavington Lane site, to ensure that sufficient allocations are made to meet the OANH and ensure that the plan is Positively Prepared, Justified, Effective and in the spirit of the NPPF. Identified Issues Affecting Deliverability of Housing Site Allocations from Devizes Area Neighbourhood Plan</p> <p>SEE TABLE ATTACHED - SUMMARISED BELOW</p> <p>SHLAA number Site Name Issue with housing numbers allocated Suggested effect on housing numbers identified 362 Northgate Gardens Planning permission now granted for 4 dwellings – site not suitable for 8 - 4 713 Railway Cuttings Major ecological issues and potential access issues – serious doubt over any future development - 9</p>			

	<p>4004 Wadworth warehouse Now retained for employment use – remodelled as Gaigers premises (related planning permission granted in 2016) - 30</p> <p>4002 St Peters School Now marketed for an extensive period without success. Involves a difficult conversion of sensitive heritage asset which is deterring developers. Not changed but doubt as to deliverability and contribution to short- medium term HLS</p> <p>15 Stonebridge House This is a viable employment site in current use and protected by Core Policy 35 of the WCS. An extension to this business use was approved in 2016 so housing is highly unlikely to be delivered on this site within the Plan period - 14</p> <p>1088 Land Adj Elm Tree Gardens Permission granted for 6 dwellings on part of a recreation space (TR17 site under old Kennet Local Plan). NPPF para 74 would now not allow for this – therefore figure adjusted to reflect - 4</p> <p>approved numbers</p> <p>367 The Meadow, Hartmoor Rd In the 2011 SHLAA, this site was identified as being in multiple or unknown ownership No change but could call into question availability and deliverability of site</p> <p>361 Magistrates Court, Northgate Street Site recently marketed and included a pre-app which raised issues over the principle of the site for any housing development due to being in setting of a LB. When independently assessed by RCC Town Planning Consultancy, it was considered that c. 3 dwellings may be achievable. - 5</p> <p>4003 Browfort, Bath Road Planning permission now granted for 55 units (60 noted in the site allocation) - 5</p> <p>9 Bath Rd Business Centre Viable business units for employment uses. These are affordable, useful and popular small/ start up business units which are under-represented within the town, together with a successful auction room. The loss of this site for employment purposes would likely result in the loss of a number of smaller employers and for this reason, they should be discounted. - 13</p> <p>Total - 84</p>
<p>Attached files (Please see Objective)</p>	<p>4712152</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1061	Consultee Mr G Gaiger Gaiger Bros Person ID: 394670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A5 West Lavington Settlement Boundary				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>(4) Consistent with National policy</p> <p>1.16 The NPPF requires local planning authorities to positively prepare plans to significantly boost the supply of housing as outlined at paragraph 47. Many Large Villages, as noted above, including West Lavington and Littleton Panell are suffering from a lack of support for services etc.</p> <p>1.17 This approach, which utilises a site allocations approach only to secure the minimum number of houses needed, is not a positive approach to sustainable development. Moreover, the evidence base for calculating the 'remaining' objectively assessed housing need is flawed as demonstrated by the table above which explains why these figures are not valid. As such, the approach will not deliver the OAHN and we disagree with the statement provided in paragraph 4.2 of the draft WHSAP that says 'There is no strong strategic priority for allocating land at Large Villages in the HMA's and no sites are proposed due to strength of supply overall.'</p> <p>1.18 By utilising correct, up to date figures, it would be seen that in fact, there is a requirement to allocated sustainable sites for housing development at the Large Villages, such as the site at Land off Lavington Lane, West Lavington.</p> <p>1.19 Unless Parish Council's are motivated and are sufficiently resourced in terms of personnel, time and finance, the approach fails to take the opportunity to deliver appropriate housing in sustainable settlements. As noted in paragraph 1.4 above, this does not help to sustain and support the level of facilities and services within the Large Villages, nor does it provide the opportunity to provide more balanced communities by securing the type of housing required by the village.</p> <p>1.20 This approach is also flawed because it will not deliver the Council's objectively assessed affordable housing need. Indeed, it is doubtful whether any affordable housing will be achieved in the Large Village settlements as many which are successful in making a NP will favour smaller scale developments which are below the affordable housing threshold. Whilst the draft WHSAP infers that affordable housing can be brought forward as 'exceptions sites' under CP44 or through the preparation of Neighbourhood Plans, there has been a persistent lack of appetite for exceptions sites over many years and as mentioned above many sustainable communities will either not get a Neighbourhood Plan made, or will allocate small sites which are under the affordable housing thresholds.</p> <p>The housing site allocations figures utilised (taken from the Devizes Area Neighbourhood Plan) should be reviewed and updated. Any sites/ numbers which are unlikely to be deliverable over the Plan period should be discounted so as to reflect the comments set out within the table above. This will allow the remaining OAHN to be properly evidenced and will result in a shortfall below the 'approximate', (we would submit 'minimum') housing to be delivered by the Plan.</p>			

	<p>Site Allocations should be made at the Large Villages to help support the sustainability of these communities, to make up the shortfall and to exceed this minimum amount to ensure a planned 5 year Housing Land Supply can be maintained over the Plan period and to reflect the fact that only 13 of the 67 Large Villages responded to the consultation saying that they were planning new housing as part of their NP work. Such site allocations should include some larger site allocations so as to ensure the delivery of affordable housing within the larger villages. These sites should be prioritised in terms of both their sustainability and support from the local community. In this instance the site at Land off Lavington Lane, West Lavington scores highly with strong NP support and a site allocation at this location should be supported.</p>
Attached files (Please see Objective)	4712152
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1062	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to comment as follows: I cannot believe that any more houses are really needed in this beautiful City. We seem to be building houses everywhere and the beautiful, medieval City is being swamped by new housing estates. I just cannot believe that you are proposing to allocate a further 850 dwellings just in this City. The documents suggest that in South Wiltshire CA there is a shortfall of only 594 dwellings – taking into account completions and existing commitments up until 2026. For the settlements of Salisbury and Wilton this shortfall equates to only 173 dwellings. Yet your document is purporting to allocate 850 dwellings in Salisbury alone! 840 of those are to be in Harnham. And 740 of those are to be in Netherhampton Road. I consider this to be a vast oversupply of housing and is absolutely unnecessary. I consider it to be unacceptable that the entire ‘need’ is to be provided in one part of the City Combined with the Churchfields allocation, this western side of Salisbury will be made to suffer the development of nearly 2000 houses!!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1063	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>S159 (North of Downton Road): I think discounted site S159 is directly comparable with suggested site S1027. Both afford views of the Cathedral; are partly in Flood Zone 2; and cannot provide a school on their own. S159 is however on a cycle link; has footpaths leading to the City (including Britford Lane at the bottom of this very field); is on the main X3 bus route; and is opposite one of the City's Park & Rides site. It also has numerous links to the hospital which is one of the City's main employers. S1027 has none of these links to the City or employment. S1027 is also adjacent to a conservation area, listed buildings a SAC and SSSI. I would suggest that out of the two, S159 is far more appropriate.</p> <p>Site 3435 (Land Off Britford Lane): You have discounted Site 3435, essentially because it is partly in Flood Zone 2 but also because 'the main road network is unable to take additional traffic'. This is the same road network that is to serve the three Harnham sites you have allocated! The same Harnham gyratory, that struggles at best to cope with the convergence of the three main routes into the City from the south and south west direction. The Harnham Roundabout cannot cope with the existing traffic load on it and regularly clogs up at weekends/bank holidays Adding 840 new households onto this road network is going to cause all sorts of issues in terms of tail backs, traffic jams, congestion, air pollution. The impact on this road network will be no different and probably significantly worse for 840 dwellings than if Site 3435 was allocated.</p> <p>Site 3421 (Land Adjacent A354): Why has Site 3421 been discounted? It is one of the most obvious places for a further expansion of the City, if it is truly needed. It would represent a natural extension to an existing modern estate. It is walkable to the City and is on a main bus route. It is also in very close proximity to the Hospital, which is one of the main employers in the City. This site is truly sustainable. You have discounted it because it 'could not accommodate enough houses to justify the necessary infrastructure improvements'. Why have you only suggested it can accommodate 330 houses? It is 21.9 hectare in size. Applying a modest 30 dwellings per hectare, would equate to 657 dwellings</p>				

	<p>East Harnham needs its own school as currently most of the traffic generated at peak school times is from parents travelling from East Harnham to the school in West Harnham Allocating Site 3421 and providing a school here would reduce traffic congestion</p> <p>Other Sites: Why hasn't the Old Sarum airport site been allocated for housing? I believe that there is a planning application currently being considered by the LPA on this site which proposes a few hundred houses. Why aren't the fields around the hospital, previously identified in the SHLAA, being allocated?</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1064	Consultee Miss Rachael Eldridge	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This site is completely unsuitable.</p> <p>This site has no direct bus, pedestrian links to the City at all and is unsustainable</p> <p>You have recently removed a well used traffic lighted crossing across the Netherhampton Road (near the shop). Crossing this road is virtually impossible as it is, without addition a further 740 households and associated traffic to the mix.</p> <p>Netherhampton Road is insufficient to take any of the additional traffic that would be associated with such a development.</p> <p>Extra traffic congestion on this inferior road will cause highway safety issues.</p> <p>Harnham Road/Netherhampton Road is essentially a residential street and the majority of residents who live on Netherhampton Road, reverse onto the road when exiting their properties. It is not suitable for the additional traffic.</p> <p>The existing road network is poor for the existing traffic let along an additional 640/740 dwellings and more B1, B2 and B8 developments.</p> <p>The Harnham Roundabout is unfit for its current purpose. The current convergence of three main routes into the City causes chaos and the existing road network cannot cope. It certainly will not cope with the additional traffic generated by such a mixed use scheme.</p> <p>The Wilton Road/A36 trunk road junction is also unfit for purpose with no right hand turn and a convoluted turning system to access the city in this direction.</p> <p>The A36 junction is framed by the Grade I listed Wilton House and its listed park and garden and listed garden wall. This junction cannot therefore be easily improved.</p> <p>I can't believe that this site has been allocated before traffic surveys, archaeological investigations and a masterplan has been drawn up, there are too many unknowns.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1065	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Its development will serve to merge the small village of Netherhampton into the main built up area of Salisbury. The site has significant level changes across it with any existing built development in the area sitting on the lower levels not extending past the Harnham Hill chalk pit cutting. The site you have allocated extends well past this natural land level and over the hill which will have a significant and detrimental impact for this part of the countryside and views into the City/Cathedral.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1066	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	West Harnham does not need another school, which will only serve to attract more traffic from across the City. The existing school is only oversubscribed because it caters for the residents of East Harnham as well as Wilton, Bemerton Heath and elsewhere in the City. Pupils travel to the school from all over the City and as a result Netherhampton Road regularly clogs up from the Harnham Roundabout all the way up to the shop during school pick up/drop off times				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1067	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	The site is sandwiched between industrial sites. B2, B8 and cattle market uses are not very compatible with residential uses and will create significant issues for residential amenity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1068	Consultee Miss Rachael Eldridge	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed development will adversely affect the nearby SAC and SSSI.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1069	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	We don't need additional B1, B2 and B8 uses, the adjacent business park is empty.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1070	Consultee Miss Rachael Eldridge	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site is also totally unsuitable Site S1027 (North of Netherhampton Road) is situated partly in Flood Zone 2. Harnham has suffered from significant flooding in the past and the development of this site will only reduce the flood plains and natural capacity for the area to cope when the river/s flood.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1071	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site's development has potential to harm the nearby SACs and SSSI and the ecological value of the area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1072	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site is adjacent to a conservation area and a number of listed buildings and therefore has potential to impact on important heritage assets. Most importantly the site affords very important views of the Cathedral from the west. No amount of Public Open Space or buffering will prevent the erosion of that view if housing is developed on this field.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1073	Consultee Miss Rachael Eldridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 898778	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site is also truly unsustainable in that it has NO current links to the City. It is not an easy walk to the City and it has no bus links what so ever. There are far more appropriate sites for development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1074	Consultee Mr Mark Tinson Business Development Manager	Agent Miss Emma Greening Senior Planner	Do you consider the draft WHSAP is legally compliant?	No
		Hills Homes Person ID: 1126841	Hunter Page Planning Person ID: 1004509	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 3549 Land North of Queensfield Barns, Sutton Lane		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The site in question is identified by the SHLAA as site 3549 and as being suitable for around 22 dwellings. A site location plan is attached. Whilst the site passed states 2a and 2b of the selection criteria, it was eventually excluded due to the level of development in Sutton Benger in recent years.</p> <p>Having regard to the recent appeal decision on Land at Arms Farm (AP/T3940/W/15/3028953) for 28 dwellings, whilst this appeal was dismissed due to the impact on the Conservation Area and heritage assets. In respect of the scale of development, whilst noting the redevelopment of the former poultry factory for around 76 dwellings, the Inspector did not consider that this development for 28 dwellings would lead to a lack of cohesion (paragraph 35). The Appeal further goes on to state at Paragraph 37 that Sutton Benger is an appropriate location for residential development with the Inspector concluding that there was no evidence to demonstrate that an additional 28 dwellings would be detrimental. A further committee report (application ref: 16/11427) on land to the north of the application site concluded that Sutton Benger was an appropriate location for development. It is noted that this application is still pending consideration (August 2017) having been deferred by the Planning Committee.</p> <p>The Housing Needs Survey for the Parish carried out in 2015 identified that there was a need for new affordable housing in the Parish. It should be noted that these may underestimate the requirements needed as it only relates to those who responded to the survey. In conclusion, the report recommends that there is a requirement for at least 4 units of subsidised rented housing and 4 units for shared/ low cost home ownership. Sutton Benger is identified within the Core Strategy as a large village which policy CP1 describes as a settlement with a limited range of employment, services and facilities. The policy further states that development at large villages will be limited to that needed to help meet the housing needs of settlement and to improve employment opportunities, services and facilities.</p> <p>The Core Strategy at policy CP43 requires development in this location to provide 40% affordable housing. Development of the site to the north of Queensfield Barns for around 22 dwellings could go a long way to meeting the identified Housing Need within Sutton Benger.</p> <p>The NPPF sets out 4 requirements which Local Plans must meet. Taking each in turn, in summary, the Allocations Plans does not meet these for the following reasons.</p> <p>Positively prepared: In this instance, by not allocating a site at Sutton Benger, the Allocations Plan has not sought to meet an identified Local Need as identified in the Housing Needs Survey. Previous appeal decisions have identified Sutton Benger as a sustainable location for development.</p> <p>Justified: At stage 3 all sites in Sutton Benger appear to have been dismissed because of growth which the village has previously been seen. Sites do not appear to have been assessed on their individual merits.</p> <p>Effective: By dismissing sites within Sutton Benger on the basis on previous development, it means that the settlement is unable to meet identified housing need which is likely to further increase over the plan period.</p>			

	<p>Consistent with National Policy: The NPPF seeks to significantly boost the supply of housing, and also seeks to plan for a mix of housing based on current and identified future trends. By not allocating sites for development in Sutton Benger, the Plan is not seeking to meet existing needs within the settlement, let alone future needs.</p> <p>Sutton Benger has been identified within both the Core Strategy and recent appeal decisions as a sustainable settlement for development. The Housing Needs Survey has identified a need for affordable housing within the village and the proposed development at Land North of Queensfield Barns, Sutton Lane would go a long way to meeting this need. Whilst outside of the settlement boundary, the site has clearly defined boundaries, it is located outside of the Conservation Area and is therefore considered a suitable site for development.</p>
<p>Attached files (Please see Objective)</p>	<p>4712102</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>These issues should be debated within a public forum.</p>

Comment ID:	1075	Consultee Ms Claire Gourlay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126851		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road/Harnham		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Regarding the sites the A3094 traffic is my main concern. I have work colleagues who use this main road. Upon the demonstration (car convoy) operated with 25 vehicles through this area on Tuesday 19th September 2017 the nursing staff of the main hospital were delayed in their arrival. This was with just 25 extra vehicles not the expected 1,000 movement a day the housing would generate. I also work along the main road and have concerns for getting out of the driveway safely on a normal day. The road is at full capacity today without extra traffic. Build elsewhere with proper infrastructure and consultation with local residents of Salisbury, not a piecemeal allocation by Wiltshire Council who apparently have little or no knowledge of the proposed site and the traffic in the area. These sites are unsustainable. Expensive housing beyond the financial reach of local residents of Salisbury. The only justification for this volume of housing would be for houses at rents which meet the average local Salisbury salary.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1076	Consultee Councillor Ernie Clark Person ID: 840630	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge Community Area housing allocations				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>You have failed at any time to consult with the Hilperton Neighbourhood Plan (HNP) Steering Group. Your methodology is inadequate and you have failed in your ‘Duty to Cooperate’ as enshrined in the Localism Act 2011. The duty to cooperate requires additional consultation beyond existing statutory consultees. “The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process”. (Paragraph: 009 Reference ID: 9-009-20140306. Revision date: 06 03 2014.)</p> <p>Wiltshire Council must work together with other bodies constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies.</p> <p>This whole plan should be dismissed and Wiltshire Council instructed to comply with its duties under the 2011 Localism act. Your method of calculating housing requirements for Housing Market Areas (HMA) is improperly based and contains errors. It seems that WC is using this exercise to improperly avoid due democratic process, and to engineer objectives beyond those required of a housing site allocations plan. An example is the allocation of land for a further 800 homes to Trowbridge (in addition to the 4,790 completed and committed and a further 1,000 ‘delayed’) despite these being in excess of HMA housing needs. This seems to be in pursuit of an ambition, unrelated to housing requirements, to create an ever larger ‘Greater Trowbridge’ urban settlement.</p> <p>You have failed to encourage effective use of brownfield sites in accordance with NPPF Core Principle 8. NPPF Core Principle 8 requires planning authorities to “Encourage effective use of land by reusing Brownfield land.” and in Topic Paper 3 you state “during the Wiltshire Core Strategy period (2006-2015) delivery of brownfield sites have contributed 29% of all housing completions”. You go on to correctly note the much greater emphasis on brownfield in national policy, particularly in the Housing and Planning Act 2016 and the Housing White Paper of February 2017.</p> <p>However, beyond these token acknowledgements, your plan fails to consider any measures to encourage effective use of brownfield, especially in the principal settlement of Trowbridge which has acres of derelict former industrial land.</p> <p>Key documents fail to address brownfield properly or at all. For example, Topic Paper 4 states that “There are significant brownfield opportunities that are a priority for redevelopment, although this source of housing land is ultimately a modest proportion of overall supply”. You willingly fail to understand that, while this might be true of Wiltshire as a whole, it is far from true for the specific urban context of Trowbridge</p>			

You have failed to include specifically identified sites, which as such are not defined by the NPPF as 'windfall' and are located within the Trowbridge Settlement Boundary.

Namely:-	The former West Wiltshire District Council Offices, Bradley Road	70 dwellings
	East Wing/Trowbridge Hospital/Margaret Stancomb School	300 dwellings
	The 'Bowyers' site adjacent to Trowbridge railway station	250 dwellings
	Ashton Street Centre	70 dwellings
	Conversion of 'The Pavillions', White Horse Business Park	130 dwellings

You have failed to allocate site 256 south of Green Lane for 167 new dwellings.

This site is a logical extension of Trowbridge town which lies between the proposed Trowbridge settlement boundary and Green Lane Wood which acts as an appropriate natural barrier to the urban spread. Further mitigation measures to reduce recreational and other impacts on Bechstein and other bat species in line with existing development permissions and allocations can be satisfactorily achieved.

You have failed to allocate site 292 north of Green Lane for 170 new dwellings.

This site is a logical extension of Trowbridge town which lies between the proposed Trowbridge settlement boundary and Green Lane Wood which acts as an appropriate natural barrier to the urban spread. Further mitigation measures to reduce recreational and other impacts on Bechstein and other bat species in line with existing development permissions and allocations can be satisfactorily achieved.

You have failed to allocate site 3247 Biss Farm for 210 new dwellings.

This site is a logical extension of Trowbridge town which lies between the proposed Trowbridge settlement boundary and the Ashton Park allocation. Part of the Ashton Park development, closest to White Horse Business Park, could be reallocated for employment uses to compensate for the loss of this area as an employment allocation. This would also have the benefit of not reducing the build rate at Ashton Park within the plan period.

You have ignored Planning Examination findings the basis for which have not changed.

Over ten years ago the Planning Inspector determined, in relation to the Hilperton Gap, in his West Wiltshire District Plan First Alteration Inspector's Report:-

"2.2.47. This area so contained comprises a series of small fields, separated by hedges, and crossed by a number of public and other footpaths. From my visits to this locality I consider that at present this area appears as a reasonably homogenous tract of open land, although there are subtle differences in landscape character within it. It is partly in agricultural use and partly consists of unused grassland, but there are views of Hilperton and the edge of Trowbridge from within and across it. I consider that the properties in Wyke Road, Victoria Road and Albert Road form an obvious definition to the eastern edge of Trowbridge hereabouts...

2.2.48. I appreciate that the proposed Hilperton Relief Road is intended to cross this land [the Gap] broadly from north-west to south-east. Although the precise alignment of the road is not formally before me, a draft scheme has been drawn up and was presented to the inquiry. From this and my own observations, I cannot imagine that substantial earthworks would be needed to accommodate the road, wherever its precise route lay, so that its impact in the landscape might not be great. In these circumstances I do not believe that it would, if built here, appear as a more convincing boundary to the town than the existing development...

2.2.49. An alternative boundary to the town policy limit further to the east would enable development to take place on the land so enclosed. This would extend Trowbridge into open land having a reasonably pleasant appearance and would in my opinion harm the semi-rural character and appearance of the area as open fields were replaced by built development of one form or another. It would also erode the gap between Trowbridge and Hilperton..."

These comments relate specifically to sites 263 and 297.

You have made unrealistic and unsubstantiated assumptions on building density.

	<p>You have proposed sites 263 and 297 for housing stating that these would provide 205 dwellings after numerous mitigation measures. These sites have a combined area of approx. 20.5 ha and thus provide a net housing density of only 10 dwellings per hectare. This is only about one third of typical modern development density and indicates a highly wasteful use of precious green field space. HGT Developments llp has applied to develop houses on the northern part of site 263, an area of about 8.5ha partially in a flood zone. After over 18 months of negotiation with WC they are now asking for approval for 170 dwellings. This is a density of 20 dwellings per hectare which would provide, were it to be approved, 80% of the dwellings expected of site 263 on 40% (and the most difficult part) of the site. WC owns site 297 and has claimed (in Wiltshire SHLAA Appendix 3 for Trowbridge community area) that it alone could accommodate 74 dwellings.</p> <p>Your calculations are clearly unsound. Either only about one third of these sites is needed to provide the 205 dwellings you claim is required, or you have deliberately underestimated the number that will be built in an obvious attempt to assuage fierce local opposition to development in the Gap.</p> <p>You have failed to reallocate housing figures within the North and West HMA from Trowbridge to other community areas. Other towns have demonstrated an ability to deliver higher than planned completions up to 2017 and can offer sustainable development sites in the plan period but you have failed to consider them. Rectification of the omissions and errors listed above.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>As an elected member of Wiltshire Council I wish to be able to explain my rationale to the Inspector if required to do so.</p>

Comment ID:	1077	Consultee Mr Ian Scaife Person ID: 473545	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.75				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Re: Draft Wiltshire Housing Site Allocations Plan/Settlement Boundary Review - The Banks, Common Road Whiteparish (Wiltshire SHLAA reference s181) Re: Supplementary comments to proposed amendments to Whiteparish Settlement Boundary Review – Your reference: 378 & 379 (earlier correspondence attached below) (NB: this correspondence has also been sent to you by letter today).</p> <p>I write to provide further information regarding land to the rear of The Banks, Common Road, Whiteparish ("The Banks"), in particular its characteristics and physical relationship to the revised settlement boundary as proposed by the Council. These are observations that may not be readily achieved by using aerial photography alone and in the absence or benefit of an on- site visit.</p> <p>Comments are provided against the Council's settlement boundary review methodology.</p> <p>Built and commenced residential and community facilities development such as religious buildings schools and community halls, that is physically related to the settlement;</p> <p>The subject land lies immediately to the south of the Whiteparish Memorial Centre - a substantial community building in the south west corner of the Memorial Ground playing fields and at the eastern end of an established car park associated with Whiteparish Surgery. The Memorial Centre is arguably the centre of the village but with only two neighbouring properties, it is in relative isolation from residential development that would consolidate its role in the urban fabric of the village;</p> <p>A substantial storage and stable building is located at the eastern end of the garden curtilage of The Banks with a stone path providing continuous access to these buildings throughout the day;</p> <p>To the south of the garden curtilage of The Banks lies a professional standard schooling arena/menage with direct access from the garden curtilage of The Banks. This arena has permanently changed the character of this land away from agricultural paddocks to leisure uses associated with equine facilities. These uses have been in existence for a significant period of time, in excess of 15 years, and are visual separated from the open fields to the east (beyond the ownership boundary of land associated with The Banks by a mature hazel and hawthorn hedge rising over 3-4m along the southern boundary of the land.</p> <p>The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location;</p> <p>the length of the Whiteparish Doctor's Surgery to the north but separated from The Banks by 2no relatively recent infill properties provides an appropriate guide to the extend of the built form settlement to the north of The Banks. This built form is extended by the inclusion of the Memorial Centre in the amended settlement boundary of Whiteparish;</p>			

	<p>The immediate garden curtilage of The Banks itself does not extend further east than the memorial ground and as such does not in itself extend the settlement boundary beyond its pre-defined natural limits. The immediate garden curtilage of the Banks, as proposed to be extended, would provide a natural continuation of the settlement boundary from the south west corner of the Memorial Centre to the rear of Croft Heights as the settlement boundary continues south;</p> <p>The remaining land in the ownership of The Banks, as described in the extant planning consent reference S/07/1416 dated 27 February 2008 (as attached to email dated 5 September 2017 and referenced at the top of this email) lies immediately south of the Memorial Ground. This land now in continuous equine use albeit distinct in nature from the arena described above is visually separated from the open fields to the east by the mature hedge line to the south and east along its boundary.</p> <p>Including this land adjacent to the Memorial Ground and the Memorial Centre, now in the amended settlement boundary, would consolidate rather than extend the cultural and social heart of the village represented by these central village functions.</p> <p>The Council has within its discretion, the ability to include all or parts of the subject land made up of three elements: the immediately residential curtilage that is well aligned with the existing building form of the village, the equine arena that represents a minor but visually isolated parcel of land, and the remaining land, which frames the Memorial Centre and playing fields, central village functions and the heart of the village, presents significant credentials for a sustainable pattern of development.</p>
Attached files (Please see Objective)	4712151
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1078	Consultee Mr Mike Wright Person ID: 1126871	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>General Concerns:</p> <p>Firstly, I cannot believe that any more houses are really needed in this beautiful City. We seem to be building houses everywhere and the beautiful, medieval City is being swamped by a doughnut form of development. At the moment development is continuing a pace at Long Hedge, Old Sarum, Pearce Way, Rowbarrow, Fugglestone Red and Wilton Hill. Every side of the City is currently suffering the disruption and inconvenience of construction and yet more development is now being identified. Surely this existing development must be adding to your housing need in some way! How can we still need more! There must be a point where Salisbury has had all it can reasonably manage. It cannot go on indefinitely, can it?</p> <p>Having read the documents however I just cannot believe that you are proposing to allocate a further 850 dwellings just in this City. The residents of this City are the envy of larger cities such as London. Salisbury has often affectionately been entitled 'the City in the Countryside'. The fact that you can be in the middle of the busy hustle and bustle of the City Centre and still feel the countryside creeping in providing the lungs to our City is a characteristic that should be respected and protected not dissolved at every opportunity. The green fields that absorb the centre and the many green open spaces and the convergence of 5 rivers are integral parts of our City and should not be wantonly developed, at whim. We need to preserve this character as it not only enhances the historic core of our beautiful City but also provides an important and heralding setting for one of the most important listed buildings in the County if not the Country – Salisbury Cathedral. The fact that you can see the Cathedral from nearly all major routes into the City as if it rises from the fields/countryside should be lauded not eroded with the innocuous, vacuous brick box houses that we can look forward to with yet more modern housing estates being encouraged on every remaining green field.</p> <p>I fear that yet more development of even more lush green fields that make up this integral character and important setting for our City and the Cathedral is a travesty and should be seriously rethought.</p> <p>The documents suggest that in South Wiltshire CA there is a shortfall of only 594 dwellings – taking into account completions and existing commitments up until 2026. For the settlements of Salisbury and Wilton this shortfall equates to only 173 dwellings. Yet your document is purporting to allocate 850 dwellings in Salisbury alone! 840 of those are to be in Harnham. And 740 of those are to be in Netherhampton Road. I consider this to be a vast oversupply of housing and is absolutely unnecessary. I also consider it completely unacceptable that the entire 'need' is to be provided in one part of the City, disproportionately affecting one sector of the community. I think these proposals are completely unjustified and your documents do not go far enough to explain why or how this has come about. Indeed, the text seems to be written to explain your intentions rather than properly and pragmatically analyse the need or assess the various sites to establish what to allocate.</p> <p>You have stated that more than 173 dwellings need to be allocated to ensure that the supply continues to be met in the long run, especially as the main allocation in your adopted core strategy – Churchfields - has a number of complexities that will take time to resolve. You then however go on to confirm that the Netherhampton Road site/s are to come forward at the end of the plan period at the same time as the Churchfields development, not instead of. There is therefore no explanation as to why you are allocating nearly 400% more houses than is needed to meet</p>				

	Salisbury's need as the Churchfields Development will meet this need. And if your grand plan does come together, this western side of Salisbury will be made to suffer the development of nearly 2000 houses!!
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1079	Consultee Mr Mike Wright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126871		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S159 (North of Downton Road)			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Discounted Sites: Having read the SHLAA and your assessment of the various sites that were presented, I am utterly bemused by your methodology and thought process. Has anyone in your department actually visited Salisbury or the sites you have looked at? Your methodology and conclusions are utterly spurious. Three sites that you have discounted at this early stage, are also in Harnham! But I feel they have very similar constraints to the sites you have allocated and therefore I do not understand how these have been discounted yet the allocation sites have not. S159 (North of Downton Road): For instance, with the S159 (North of Downton Road) site, you have claimed that this is an unsustainable site because it affords views of the Cathedral; is partly in Flood Zone 2; there are no links to the City; and it could not on its own provide a school. However S159 (North of Downton Road) is on a cycle link; has footpaths leading to the City (including Britford Lane at the bottom of this very field); it is on the main X3 bus route; and is opposite one of the City's Park & Rides site. It also has numerous links to the hospital which is one of the City's main employers. It is hardly an unsustainable site. The so called constraints that you have highlighted for this site are however entirely comparable with the constraints that exist for S1027 (North of Netherhampton Road), but the latter has gone through to allocation. Like S159 (North of Downton Road), Site S1027 (North of Netherhampton Road) is also situated partly in Flood Zone 2; it's development with dwellings, has potential to harm the nearby Special Area for Conservation (SACs) and Site of Special Scientific Interest (SSSI); it is adjacent to a conservation area and a number of listed buildings; and it also affords important views of the Cathedral. It is however truly unsustainable in that it has NO links to the City. It is not an easy walk to the City and it has no bus links what so ever. And on its own it cannot justify infrastructure improvements or a school. I would suggest that based on your analysis and key criteria, neither site is suitable for development. BUT out of the two, S159 (North of Downton Road) would be a far more appropriate site for development and far more 'sustainable' than S1027 (North of Netherhampton Road).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1080	Consultee Mr Mike Wright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126871		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 3435 (Land off Britford Lane)			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site 3435 (Land Off Britford Lane): You have also discounted Site 3435 (Land Off Britford Lane), essentially because it is partly in Flood Zone 2 but also because ‘the main road network is unable to take additional traffic’. You do realise that the main road network that this alternative site feeds into is the same main road network that all three sites in Harnham that you have allocated feed into don’t you? The same Harnham gyratory, that struggles at best to cope with the convergence of the three main routes into the City from the south and south west direction, will serve both Netherhampton Road sites and the extension to the Rowbarrow site (site 3272 (Rowbarrow)). If this really is a constraint that prevents site 3435 (Land Off Britford Lane) from being allocated then I would suggest that it is a constraint that is equally applicable to S1027 (North of Netherhampton Road), S1028 (Land at Netherhampton Road) and 3272 (Rowbarrow). Or has this site actually been discounted because it became a political hot potato with the ‘Save the Meadows’ campaign?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1081	Consultee Mr Mike Wright Person ID: 1126871	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 3421 (Land Adjacent A354)			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Discounted Sites</p> <p>Having read the SHLAA and your assessment of the various sites that were presented, I am utterly bemused by your methodology and thought process. Has anyone in your department actually visited Salisbury or the sites you have looked at? Your methodology and conclusions are utterly spurious.</p> <p>Three sites that you have discounted at this early stage, are also in Harnham! But I feel they have very similar constraints to the sites you have allocated and therefore I do not understand how these have been discounted yet the allocation sites have not.</p> <p>Site 3421 (Land Adjacent A354): You have also discounted site 3421 (Land Adjacent A354). This is unbelievable as I would suggest that this and the fields around the hospital are the most obvious place for a further expansion of the City, if it is truly needed. It would represent a natural extension to an existing modern estate. It is walkable to the City and is on a main bus route. It is also in very close proximity to the Hospital, which as I have said above, is one of the main employers in the City. This site is truly sustainable. However you have discounted it because it 'could not accommodate enough houses to justify the necessary infrastructure improvements'. This is crazy! The site is 21.9 hectare in size. Applying the government minimum of 30 dwellings per hectare, this site could accommodate well over 600 houses – 657 to be exact. Why then does your SHLAA document only suggest it can accommodate 330 dwellings? Applying an appropriate dph, this site would more than deliver what you have identified is necessary, in a far more sustainable location than the Netherhampton sites. It would also finally provide East Harnham with its own school, thereby reducing traffic congestion, rather than giving a second school to West Harnham thereby encouraging all of the local traffic to travel across the City, through the Harnham gyratory, along the insufficient Netherhampton Road to get to a school. I would suggest that proper planning would confirm that there would be far less impact to the local traffic network and the development would be far more sustainable if the development and new school were to be focussed in East Harnham. Site 3421 (Land Adjacent A354) represents one of the best options as it is close to the hospital - and jobs. It is on a bus route and has good links to the City. A school on this side of Harnham would also be beneficial without being built virtually on the doorstep of the existing school in West Harnham. I would also, again, suggest that there is little difference between the 'constraints' you have identified for site 3421 (Land Adjacent A354) compared with S1028 (Land at Netherhampton Road) and yet again the 'constraints' have ruled 3421 (Land Adjacent A354) out but not S1028 (Land at Netherhampton Road). It is a completely spurious methodology and does NOT represent good planning of my City.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1082	Consultee Mr Mike Wright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126871		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Why has the Old Sarum airport site not been allocated for housing? I believe that there is a planning application currently being considered by the LPA on this site which proposes a few hundred houses. This isn't included in any of your calculations. Its allocation would serve to infill between the main built up area and the Old Sarum Housing Estate so must be considered to be sustainable and would serve to no doubt fulfil the actual surplus of 173 dwellings thereby negating the need to allocate any more sites.</p> <p>Also there are a number of vacant fields in and around the Long Hedge development that is currently under way. Surely infilling these areas and providing more linkages to the existing developments within our City would be a better approach than starting again with a new green field site that is very isolated.</p> <p>In a previous document and SHLAA I remember seeing that the fields that wrapped around the main hospital of the City were also being assessed for development, yet these have not made the cut. I haven't seen any information on these in the current raft of documents (perhaps I have missed your assessment of these) but to my mind this would make an ideal location for new development. There are already good bus links to the hospital from the City and as I have already said, the hospital is one of the main employers. It also has good footpath links to both the City and the Park and Ride and therefore, again would represent a natural expansion of the City and would be truly sustainable! It is not clear why this site has been omitted from the plan or plans for the future.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1083	Consultee Mr Mike Wright Person ID: 1126871	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	S1028 (Land at Netherhampton Road)				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Allocated Sites: S1028 (Land at Netherhampton Road): The fact that site S1028 (Land at Netherhampton Road) has made the cut is a real concern for a number of reasons as I believe that this site is totally unsuitable for new residential development. My reasoning is as follows: This site has no direct links to the City at all. It is a little isolated outside of the main built up area and will serve to merge the small village of Netherhampton into the main built up area of Salisbury. Netherhampton Road is insufficient to take any of the additional traffic that would be associated with such a development. Harnham Road/Netherhampton Road is essentially a residential street that is gradually turning into a bypass yet is not dual carriageway (and has no way of becoming a dual carriageway) and the majority of residents who live on Netherhampton Road, reverse onto the road when exiting their properties. The existing road network is poor for the existing traffic let alone an additional 640 dwellings and more B1, B2 and B8 developments. There is no need for another school to serve West Harnham. The existing school is only oversubscribed because it caters for the residents of East Harnham as well as Wilton, Bemerton Heath and elsewhere in the City. Pupils travel to the school from all over the City and as a result Netherhampton Road regularly clogs up from the Harnham Roundabout all the way up to the shop during school pick up/drop off times. West Harnham does not need another school, which will only serve to attract more traffic from across the City. The site has significant level changes across it with any existing built development in the area sitting on the lower levels not extending past the Harnham Hill chalk pit cutting. The site you have allocated extends well past this natural land level and over the hill which will have a significant and detrimental impact for this part of the countryside and views into the City/Cathedral. The policy (H.3.1) confirms that any development will be retained to the 75th contour but there is no notion of what that means on the ground and the red line site includes an entire site that according to the SHLAA can accommodate 1125 dwellings. To my mind only the very frontage of the site is suitable for any development and it should not extend past the natural built line and massing that is already created by the existing industrial units on the adjacent sites. This however does not provide a very large site and I therefore assume that more of the site is to be developed in order to accommodate the mixed use development that is outlined in the DPD including 640 dwellings, a school, a local entre and more! The site is sandwiched between industrial sites. B2, B8 and cattle market uses are not very compatible with residential uses and will create significant issues for residential amenity. I cannot see how the site can be effectively developed with residential development without significantly reducing the size of the site or resulting in an adverse impact for these existing businesses from noise nuisance and disturbance complaints. The site is well out of town and is virtually in Netherhampton. It has no direct pedestrian links into the City and is not on a bus route. I would say it is not at all sustainable and there are better, more sustainable options in the City.				

	<p>The Harnham Roundabout is unfit for its current purpose. The current convergence of three main routes into the City causes chaos and the existing road network cannot cope. It certainly will not cope with the additional traffic generated by such a mixed use scheme. Harnham Road/Netherhampton Road being a residential street, cannot be increased width and cannot therefore be improved to increase its capacity. The other end of the road feeds into the busiest road in Salisbury – the A36 trunk road. This junction and part of the road is framed by the Grade I listed Wilton House and its listed park and garden and listed garden wall. This junction cannot therefore be easily improved. The road will and is insufficient for purpose and will not be able to accommodate the traffic movements that would be generated by a further 640 (possibly 740) households.</p> <p>S1028 (Land at Netherhampton Road) is close to a SAC and SSSI and the proposed development will have detrimental impact for the ecological value of the area.</p> <p>The allocation policy in the draft DPD suggests that this site is to be allocated for ‘approximately’ 640 dwellings. What does this mean? This is not precise enough and suggests it could be a lot more – especially as the SHLAA suggests that this site has capacity for 1124 dwellings. Your own policy also confirms that there are a lot of unknowns – such as archaeological importance and transport uncertainties – which will all need to be assessed to ‘inform a future development’. I am amazed that you can get so far with an allocation – your main allocation at that – without already having thoroughly assessed the constraints. What if the whole site is covered in archaeological remains and cannot be developed? Is this site really deliverable?</p> <p>My experience is that once a site is allocated it is virtually impossible to reduce the level of development, no matter what constraints are found after the fact. I would suggest that before this site can be allocated there has to be more certainty about its deliverability and the constraints in order to properly assess exactly what can be delivered on the site. A housing allocation figure should be based on facts and known impacts not plucked out of thin air!</p> <p>The policy for this and the northern site (S1027 (North of Netherhampton Road)) suggest that GP surgeries and healthcare improvements will be secured from the development. How? This is not normally a planning matter as it is governed by completely separate legislation and public bodies. You also have no policies in your adopted Core Strategy that seek to secure contributions towards GP surgeries or healthcare. This will not be achievable and the suggestion feels like it is just a sop to make the site’s allocation more palatable.</p> <p>The policy suggests that this site will provide a mixed use development including B1, B2 and B8 uses. The existing business park adjacent to the site is already under developed and empty. What will happen to the adjacent site? You should be encouraging such development there, not on a new greenfield site. In any event, as has been said above, such uses are incompatible with a residential use so is likely to cause future conflict for amenities of the businesses involved.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1084	Consultee Mr Mike Wright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126871		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027 (North of Netherhampton Road)			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This site has been allocated as an extension to S1028 (Land at Netherhampton Road) and will aid the ability to secure an unnecessary school in this area. However it has a number of constraints which in my mind make it unsuitable for development – as alluded to above. These are as follows:</p> <p>Site S1027 (North of Netherhampton Road) is situated partly in Flood Zone 2. Harnham has suffered from significant flooding in the past and the development of this site will only reduce the flood plains and natural capacity for the area to cope when the river/s flood.</p> <p>This site's development has potential to harm the nearby SACs and SSSI and the ecological value of the area.</p> <p>The site is adjacent to a conservation area and a number of listed buildings and therefore has potential to impact on important heritage assets. Most importantly the site affords very important views of the Cathedral from the west. I note that the drafted policy H.3.3 suggests that an open space buffer will be created along there road boundary in order to secure continued views of the Cathedral. However this represents two problems. Firstly, the views of the Cathedral along Netherhampton Road from the west are both long distance and short distance views. No amount of Public Open Space or buffering will prevent the erosion of that view if housing is developed on this field. Secondly, this site is supposed to link up the south of Netherhampton Road site (S1028 (Land at Netherhampton Road)) and natural links between the two is required so that the school, local centre and businesses are fully accessible. The public open space/landscape buffer along this road boundary will only serve to isolate and sever this northern development from the southern development. It won't therefore achieve what you are expecting it to achieve. One of these factors will suffer and I suspect it will be the 'protected views' of the Cathedral rather than the viability of a school or local centre.</p> <p>This site is also truly unsustainable in that it has NO current links to the City. It is not an easy walk to the City and it has no bus links what so ever. There are far more appropriate sites for development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1085	Consultee Anna Treseder	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126944		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With reference to the proposal to build 840 new properties on three sites in Harnham as a resident of the area since 1995 I wish to put forward my objections to the developments under the following headings:</p> <p>1) Roads/Traffic The Netherhampton Road is already very busy, with substantial queues at peak times. The route towards Wilton alongside the Wilton House wall and the roundabout is already very busy with queues at peak times. The bridge into Salisbury at Newbridge Road is very busy already and there are queues at peak times. The Harnham Gyratory roundabout is a very badly designed piece of road. It is already very busy, particularly at peak times, with traffic queuing back to the Radnor Hall on some days. The A36 to Southampton is a disgraceful entry to and exit from Salisbury with frequent congestion, as is the A36 along the Wyley Valley towards Warminster. The A30 out of Salisbury is already very busy with frequent congestion in both directions. Salisbury City centre is frequently gridlocked. Considering all these existing problems why do the planners think that south Salisbury is a suitable location for another 840 homes which will exacerbate them?</p> <p>2) Public transport There is little or no public transport along the areas of the Netherhampton road.</p> <p>3) Schools What extra facilities will be available to the children who will inevitably come to live in these new houses if they are built? Schools in Salisbury are already under pressure.</p> <p>4) Doctors/Dentists What extra facilities will be available to the people who will come to live in these new houses if they are built? Doctors and dentists surgeries in Salisbury are already underpressure with people having to wait three weeks for GP appointments and failing to find NHS dentists.</p> <p>5) Hospital Services What extra facilities will be available to the people who will come to live in these new houses if they are built? The hospital is already underpressure with people having to wait many months for appointments/operations.</p> <p>6) Flooding With five rivers in the Salisbury area flooding is always a risk, particularly when the water meadows cannot cope with extra water. This endangers the City and its environs including the Close and the Cathedral itself. There have been previous investigations and reports on the effect of building in Harnham and the impact on the flood plain. Surely the potential developers are aware of this problem and should not be seeking to endanger the flood plain by building in Harnham?</p>				

	<p>7) Jobs With shops and businesses closing down or relocating out of Salisbury what employment will be available locally for all the people in 840 new houses?</p> <p>8) Affordable Housing How many of the proposed houses will be low cost affordable homes for key workers and homeless families and how many will be expensive homes to maximise profit for the developers?</p> <p>I attended the consultation meeting in Harnham on 6 September 2017 and the consensus of opinion in the hall reflected my own concerns. We hope that this project will be quashed because the infrastructure to support another 840 homes in Harnham does not exist.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1086	Consultee Mr Richard Deane vice-chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Salisbury Civic Society		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3, site N of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Salisbury Civic Society opposes this site. Had it been in the original range of sites, the Society is highly likely to have opposed it in its 2015 response.</p> <p>The Society's view is that development here would potentially be damaging to the setting of the cathedral, and to the wider view of Salisbury on the approach from the west. The assessment of the site notes its location 'in an area which is sensitive in terms of the setting of the cathedral', but the only suggestion towards practical recognition of this issue is one for open space along the southern boundary. This is highly unlikely to be a sufficient answer.</p> <p>On the question of impact on views of the wider city, the assessment is silent. Currently the sharp boundary of the city to the north of the Netherhampton Road is mostly masked by mature trees, greatly reducing the impact of the built-up area as it is approached along that road. S1027 is to the west of that screen of trees, and development here is likely to complete change the whole perception of the city from this direction. It is hard to see how a screen of anything like comparable effectiveness could be achieved to the west of the new development. The Society believes that landscape considerations alone are sufficient to rule out S1027 as an appropriate location for development.</p> <p>Site S1027 N of the Netherhampton Road should be removed from the list of sites. If this means the shortfall has to be made up elsewhere, the Civic Society would point either to the possibility of greater capacity at S1028 (but only if the hopeful words in the consultation document about being able to address the site's traffic impacts are actually borne out), or to S80 at Old Sarum, which was a site supported by it in 2015. The Society believes that the scale of development to date at Old Sarum makes further housebuilding logical, provided that landscape impacts can be controlled. Further development, at S80, would not be ruled out by landscape considerations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1087	Consultee Mr Graham Clemow	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126865		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is inadequate road capacity to support new housing on Netherhampton Road which is already very congested at peak times. Update the Salisbury Transport strategy to take into account existing traffic flow and bottlenecks and to provide some realistic solutions to the traffic congestion that Salisbury already suffers. Once that has been done it will become crystal clear that major housing development off Netherhampton Road is not the correct approach. Minor amendment: remove policy H3.1.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1088	Consultee Mr Richard Deane vice-chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Salisbury Civic Society Person ID: 1126725		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H.3.4, land at Rowbarrow			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Salisbury Civic Society accepts this site, but only in a greatly reduced form. It believes that in order to avoid intruding into important views, only 22 units can be found here, in the NW corner of the site. Reduce this site to no more than 22 houses. If this means the shortfall has to be made up elsewhere, the Civic Society would point either to the possibility of greater capacity at S1028 (but only if the hopeful words in the consultation document about being able to address the site's traffic impacts are actually borne out), or to S80 at Old Sarum, which was a site supported by it in 2015. The Society believes that the scale of development to date at Old Sarum makes further housebuilding logical, provided that landscape impacts can be controlled. Further development, at S80, would not be ruled out by landscape considerations.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1089	Consultee Mrs Julia Parker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126867		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.14 WHSA PSCONS09L BarTERS Farm, Chapmanslade			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am very pleased to read that Wiltshire Council are proposing a mixed housing development of this site on the edge of Chapmanslade. It is a sensible place to build much-needed additional housing, being a site that is already partially developed, largely set back from the road and therefore not diminishing the look and feel of the existing village. The owners of the site seem sensitive to the needs and views of existing village residents and have gone to great lengths to take all preferences on board. In a recent village survey, I believe that 61% of the residents that took part said they wanted additional "affordable housing" in Chapmanslade - this development will be a good way to deliver on their wishes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1090	Consultee Mr Calum Grant-Wood Person ID: 1126843	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - specifically Policy H3.1, Policy H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The overall scale of development proposed for Salisbury is totally disproportionate to the size of the city and its facilities. In particular the Netherhampton road proposals have specific traffic issues:</p> <ul style="list-style-type: none"> - The current traffic bottle neck of Harnham Gyratory & New Bridge Road to travel into the city or to Southampton / Bournemouth / Andover and London. This is already at capacity with too many vehicles taking the alternative over the tiny medieval bridge on St Nicholas' road. The local roads already run to capacity and any additional traffic will bring the area to almost permanent gridlock. - Until such time as there is sufficient local employment for all these new people to use public transport, hundreds more cars will have to be used to take people to work in the areas listed above aggravating the traffic problems at Harnham & New Bridge road. - All the supermarkets are on the north side of Salisbury's rivers, again therefore aggravating the traffic issue - Local infrastructure (hospital, surgeries, schools etc) are already at capacity. Additional facilities need to be provided before the housing. <p>The scale of additional housing proposed for Salisbury is not justified on the grounds of demand and the southern locations will not be effective as they put too great a burden on the local infrastructure, causing inconvenience, cost and discomfort for all residents, tourists, visitors and people passing through the area.</p> <ul style="list-style-type: none"> - Smaller scale developments - Consideration for where people will work and shop and how they will get there. - Building infrastructure (roads, surgeries, schools etc) in advance of housing development - Accepting that Salisbury is on a flood plain and accept the limitations of additional development that implies. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1091	Consultee Mr Richard Deane vice-chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Salisbury Civic Society Person ID: 1126725		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Salisbury Civic Society would like to repeat a view it put at the outset of the S Wilts Core Strategy process in 2008. It strongly believes that the current pattern of endlessly seeking more housing sites of the periphery of Salisbury is not a sensible way of approaching the problem of ever-increasing demand for such sites, and prevents any coherent approach to infrastructure needs. The Society believes that a new settlement, somewhere in the eastern part of the district, should be given very serious consideration, as far and away the most sensible way of accommodating demand in the long term. It is not realistic at this stage of the plan process to expect a radical shift to an emphasis on a new settlement in order to meet current requirements. However a new settlement should be included in future thinking.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1092	Consultee Princeton Homes Person ID: 1126886	Agent Tom Wright Planner Origin3 Person ID: 1126888	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Plan Strategy				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On behalf of our client Princeton Homes, please accept this letter setting out our representations to the pre-submission version of the Wiltshire Housing Site Allocations Plan (SAP).</p> <p>Whilst we understand this consultation period is principally to discuss policies within the emerging SAP, we consider there to be a wider issue in hand with the Council's planning strategy moving forwards that needs to be addressed relating to soundness and consistency with the NPPF. Wiltshire Planning Strategy</p> <p>When the adopted Wiltshire Core Strategy (CS) was examined in 2014, it was acknowledged by the CS Inspector that the plan period up to 2026 does not provide the preferable 15 year horizon advised by paragraph 157 of the NPPF (only 12 years of the plan period left at the time), which reads as follows:</p> <p>"Crucially, Local Plans should: (...) be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date".</p> <p>The CS Inspector did however consider this to be sufficient, so long as the Council undertook an early partial review of the CS, including an updated Strategic Housing Market Assessment (SHMA) (paragraph 20 of the Inspector's Report, December 2014).</p> <p>Three years on, and with only 8/9 years of the plan period remaining, the committed early CS review has not yet been undertaken.</p> <p>Whilst the emerging SAP seeks to complete the Development Plan it only seeks to allocate sites to meet the minimal residual housing requirement now left in the current plan period. This plan should be more comprehensive in addressing the housing requirement for Wiltshire beyond the current plan period moving forwards and should ideally be in the form of a CS review as required by the Inspector or an advance on a more substantial update to planning policy through a new local plan.</p> <p>At a minimum, the SAP should allocate for considerably more housing than the residual housing requirement set by the CS on the basis the early review has not come forward.</p> <p>At present, taking into account dwelling completions and commitments (referring to Table 4.1 of the SAP), there is only a fraction of the housing requirement for each HMA left to identify up until 2026 suggesting a more substantial review would be more appropriate. Using the figures provided in Table 4.1 of the SAP, the following residual requirements are to be found (which are minimal at best):</p> <p>East Wiltshire HMA – Only 2.9% of the minimum housing requirement left to identify;</p> <p>North & West Wiltshire HMA – Only 2.3% of housing requirement left to identify; and</p> <p>South Wiltshire HMA – Only 5.7% of housing requirement left to identify (albeit, the SAP provides fractionally more than the minimum requirement for each HMA).</p> <p>Based on the above, alongside commitments made by the Council during the CS Examination in 2014 to undertake an early review, a more substantial review of the housing requirement and locations for growth should be progressed as part of this process. This would suggest strong delivery across all HMAs still with 8 years to go on the current plan period.</p> <p>The NPPF (paragraph 47) stipulates that to boost significantly the supply of housing, "local planning authorities should:</p>				

	<p>identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15" [underlined for emphasis]</p> <p>However, as we are now a significant way through the plan period (2006-2026), the Council is unable to identify a sufficient supply of specific, deliverable sites for years 6-10 as required by the NPPF. It is understood that the Council anticipates the adoption of the SAP next year (2018). At this point, there would be less than 8 years of the plan period left. This is not consistent with the NPPF and as such cannot be considered "sound".</p> <p>At present the SAP refers to housing land supply figures with a base date of April 2016 (Table 4.8) and presents a scenario which suggests the Council can demonstrate a five year supply for the remainder of the plan period. However, this will need to be updated with more recent housing land supply figures by the time the plan is at examination. More up to date calculations by the Council itself suggests the Council cannot demonstrate such a comfortable rolling five year supply beyond the initial five year period.</p> <p>Topic Paper 3 (Table 3.4) which forms part of the evidence base to the SAP, estimates a more accurate up to date land supply position based on supply throughout 2017. This suggests that, based on current figures, the planning strategy leaves the Council without a demonstrable five year supply in any of the three HMAs towards the end of the plan period (2025/26), shown as follows: [refer to table in attached representation document]</p> <p>It is clear that the Council needs to plan for further growth to sustainable settlements in order to ensure that it maintains a rolling five year supply to the end of the plan period and indeed beyond.</p> <p>With reference to the Cabinet minutes¹ of the 12th September 2017, it is acknowledged that the Council no longer intends to undertake a "partial review of the CS", with a view to undertaking a "Swindon and Wiltshire Joint Spatial Framework" and subsequent "Wiltshire Local Plan Review". We support the Council's intentions to review the wider planning strategy to ensure there is a suitable growth strategy to support housing need moving forwards. If as it appears the Council no longer intends to undertake an early CS review as required, the SAP must do more to ensure that the Council can demonstrate a rolling five year supply until the end of the current plan period (2026). At present, any delays to the Wiltshire Local Plan Review scheduled for adoption in Q1 of 2021 runs the risk of leaving the Council without a demonstrable five years supply.</p> <p>Furthermore, there are no guarantees that the high numbers of "commitments" relied on across all three HMAs will deliver within the suggested time period and there appears to be no safety mechanism for under or non-delivery. In respect of Devizes for instance, we are of the opinion that at least one or two of the NP allocations are unlikely to come forward within the plan period.</p> <p>As set out above, the SAP therefore needs to ensure as a minimum there is a demonstrable five year supply across all three HMAs for the remainder of the plan period. This is particularly important if the Council does not address the requirements of a CS review now, given the lengthy time-scales that are involved in producing a new Joint Local Plan. The SAP should therefore look to include additional strategic allocations at the most sustainable settlements to ensure there is a sufficient buffer above the minimum housing requirement and to buffer against non-delivery. This is made even more important in light of the recent Government announcements² to simplify the calculation of Objectively Assessed Need (OAN) which, over the next year, we anticipate alongside the updated SHMA for Swindon and Wiltshire, will increase the housing requirement significantly.</p>
<p>Attached files (Please see Objective)</p>	<p>4712188</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1093	Consultee Princeton Homes	Agent Tom Wright Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126886	Origin3 Person ID: 1126888	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Devizes represents an appropriate location in which to direct further growth. It is identified as a "Market Town" in the adopted CS, described as having "the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self-containment and viable sustainable communities."</p> <p>There has been a strong market for growth in Devizes over the plan period to date which is shown through the high number of dwelling completions and commitments. Demand for more housing and employment at Devizes is expected to remain high and the Council should be actively promoting additional growth to support this.</p>				
Attached files (Please see Objective)	4712188				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1094	Consultee Mr Ben Pearce Consultant	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Land Development & Planning Consultants Ltd Person ID: 162663		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.8			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The fact that settlement boundaries have been used by Wiltshire Council in the past does not automatically provide justification their continue use going forward. LD&PC Ltd consider that the removal of settlement boundaries from small villages was a positive step that enables a site by site approach to be taken to rural development according to the principles of sustainable development and material considerations. Identifying discrete boundaries to the limit of sustainable development unnecessarily stifles the organic development and, ultimately, the preservation of rural communities. The plan can be more effective in providing for rural development, both economic and residential, through the removal of settlement boundaries from both large and small villages. Such an approach would enable organic development well related to existing settlements and together with the neighbourhood planning process allow for larger allocations to meet identified needs of the community.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1095	Consultee Miss Victoria D'Avanzo Person ID: 1126899	Agent Mr Lachlan Robertson Partner Carter Jonas Person ID: 1123010	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S113 Shrewton		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We consider the Wiltshire Site Allocations Plan (WSAP) to be unsound due to several key errors (identified in attached document) made during Stage 2 of the assessment. These errors have resulted in Site S113 being rejected without sound reason, leading us to believe the WSAP is unsound.</p> <p>The inaccuracy upon which the assessment of S113 was based means we must consider the WSAP to not be justified or effective; an error has resulted in an unjustified rejection of my site, demonstrating an ineffective assessment method.</p> <p>A positively prepared plan that is consistent with national policy should not allow errors in assessment, such as those made in the assessment of S113, to be made. Hence, we must consider WSAP unsound in all four categories specified at question 5.</p> <p>Due to key errors made at Assessment Stage 2, we believe our site was wrongly rejected, causing us to find Wiltshire Site Allocations Plan unsound. Our reasons for finding the plan unsound are as follows:</p> <p>1) Comments on unsoundness of Assessment Stage 2</p> <p>In the drafting of the Wiltshire Site Allocations Plan, Site S113 (Land to the rear of Hinde's Meadow) has been rejected at Assessment Stage 2A: Exclusionary Criteria, due to a consideration of accessibility. This decision has been made despite all other criteria being met, and has been based upon a consideration that has made several key errors;</p> <p>Access to the site has been incorrectly identified as a bridleway; it is actually a properly surfaced unrestricted byway open to all traffic.</p> <p>This byway is alike in character to the adjacent road, Elston Lane, and provides sufficient access to both Shrewton House and Shrewton Farm (indicating it can provide access to wide vehicles). Furthermore, the byway entrance is clearly visible from both approaches along Elston Road, allowing safe use.</p> <p>From the previously mentioned byway, a point of access (a double gated entry) to the site already exists.</p>				

The point of access along the sites North Eastern side, adjacent to its byway, has not been identified. The gated entry identifies an existing point of access to the site, confirming the suitability of the byway as a suitable route to and from the site.

It has been incorrectly stated that third party land is required to bring access to acceptable standards; the land immediately adjacent to the site is in fact the property of the same owner.

Should it be necessary, access to the site can be provided via the London Road, which sits adjacent to the land owner's boundary. There is potential to provide appropriate access points without damaging the integrity of the woodland.

In summary, considering the site met all specified exclusionary criteria at Assessment Stage 2A, and was rejected only after consideration of accessibility based on inaccurate information, there is no sound reason the site should not progress to Assessment Stage 3: Sustainability Appraisal.

We have therefore undertaken an evaluation against the Sustainability Appraisal Framework as follows:

(See attached document, S113 AS3)

2) Predicted result of Assessment Stage 3

Using the Sustainability Appraisal Framework (found in the Sustainability Appraisal June 2017, p.90), we have assessed the site against the framework, and found it to satisfy most criteria.

Development at S113 will have a moderate positive effect upon Climatic Factors, Historic Environment, Population and Housing, and Economy and Enterprise. It will have a minor positive effect on Air Quality and Environmental Pollution, Landscapes, and Transport

Development will have a neutral impact upon both Water Resources and Healthy and Inclusive Communities.

The nature of the intended development (residential) means there will be a minor adverse effect upon Biodiversity and Land and Soil Resources.

It appears that development at the site will have a positive effect on the majority of Sustainability Topics, and only a minor adverse effect on two topics, it can be concluded that use of the site would allow Sustainable Development to contribute to growth in Shrewton.

3) Conclusion

The projected result of Assessment Stage 3 demonstrates the sites suitability for development. Should it be re-assessed with amendment to the identified errors, it can be presumed the site would pass both stages 2 and 3, and successfully become part of the Wiltshire Site Allocations Plan. This re-assessment would allow us to find the plan sound, and allow us to support its publishing and delivery.

We are confident this representation will be fairly considered, and look forward to receiving your response.

The re-assessment of Site S113 is necessary to allow the WSAP to be considered sound; re-assessment will provide the opportunity to address the errors that resulted in accurate assessment of the site. Once these errors are addressed, and subsequent assessment is made in an

	<p>effective and justified way, we shall be able to consider the WSAP positively prepared and consistent with national policy, and hence, find the WSAP sound.</p> <p>Please see attached document (S113 Rep) for suggestions to suitable changes at assessment stage 2, and predicted result of assessment stage 3 (S113 AS3).</p>
Attached files (Please see Objective)	4712209
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1096	Consultee Mr Ross Kavenagh	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 399816		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Housing Site Allocations does not reflect the endorsed Strategic Plan. Development along Elizabeth Way will lead to the expansion of Trowbridge right up to the Hilperton village policy limit. Policy states that development should not lead to the convergence of towns with neighbouring villages and that villages should be able to maintain their historic character. Follow the strategy set out in previously consulted documents.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure council development officers don't simply ignore public representation as they appear to do whenever public consultation raises awkward questions.			

Comment ID:	1097	Consultee Mr Mark Edwards Business Support Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Calne Town Council Person ID: 1126863		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.22 Amended Settlement Boundaries		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	65/17 DRAFT WILTSHIRE HOUSING SITE ALLOCATION PLAN CONSULTATION The Community Area Topic Paper for Calne was circulated to the Committee. It was agreed to provide feedback and ask that consideration is given to extending the settlement boundary to include developments which have commenced since 2016. Extend the settlement boundary to include developments which have commenced since 2016.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1098	Consultee Mrs Ann Bizeray Clerk to Heywood Parish Council	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Heywood Parish Council Person ID: 1131482		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.58			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ol style="list-style-type: none"> 1. Against the principle of allowing employment areas and residential areas within which would generate conflicts of use. 2. West Wilts Trading Estate is wholly within the Parish of Heywood, and not in town of Westbury, and should not therefore be treated in the same way as an employment see Topic Paper 1, Settlement Boundary Review methodology. 3. Lodge Wood Farm is an isolated dwelling and should not therefore be included at all. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Note: should there be a requirement to participate at the oral examination, a Parish Councillor will represent Heywood Parish Council.				

Comment ID:	1099	Consultee Mr Ben Pearce Consultant	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Land Development & Planning Consultants Ltd		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.41			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The amended settlement boundary of Semmington is welcomed, reflecting the built form of the village as presently exists. Paragraph 1.1 of the Housing Site Allocations Plan suggests that the plan has been prepared to allocate new sites for housing to ensure delivery across the plan period, maintaining a five year housing land supply until 2026. However, focusing solely upon the obligation to meet an objectively assessed need up-to 2026 unhelpfully restricts the ability to plan for housings needs beyond the plan period. Effective future-proofing of the Housing Site Allocations Plan, and securing of the five year housing land supply, may be achieved through acknowledgement within the Plan of significant consents that have been granted, and not yet implemented, such as the 24no. dwellings at St Georges Road, Semmington (ref. 16/01678/OUT); together with sustainable sites that have been promoted through the SHLAA process, such as the former Sale Ground (SHLAA ref. 724). The two sites are shown on the attached drawing ref. LDC.2089_01. Development of these two sites at Semmington will assist in the preservation of the five year housing land supply, and result in a local and defensible settlement boundary to the village into the next plan period.				
Attached files (Please see Objective)	4712200				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1100	Consultee Mr Robert Wort Durrington Square Limited Person ID: 1126914	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONSULTATION ON THE PRE-SUBMISSION DRAFT WILTSHIRE HOUSING SITE ALLOCATIONS PLAN DURRINGTON SITE 3410 This representation is made by Durrington Square Limited, the owners of SHLAA site reference 3410 in the Wiltshire Housing Site Allocations Development Plan Document (WHSADPD). This representation is being made as part of the consultation process requiring submissions to be lodged by 22nd September 2017. The purpose of this representation is to demonstrate that site 3410 should be allocated for housing together with urgently required local facilities including a doctor's surgery and a public open space as part of a comprehensive use of the site.</p> <p>This submission is made up of the following elements:</p> <p>Demonstrating how the site can meet the two objectives of the WHSADPD Demonstrating that the exclusionary questions have been misapplied in the site selection process. Demonstrating the existing use of the site for recreation, which is already a deviation from the allocated use in the Salisbury District Local Plan 2011 Comments upon the Pre-application submitted in 2015. Commentary on demand for uses. Appendices 1-5.</p> <p>DEMONSTRATING HOW THE SITE CAN MEET THE TWO OBJECTIVES OF THE WHSADPD. The two objectives of the WHSADPD outlined below are met by including site 3410. Objective 1: To ensure there is a clear definition to the extent of the built up areas at principal settlements, market towns, local service centres and large villages. Our comment – The existing housing to the south and eastern boundaries, together with the A345 road provide a very clear definition as is apparent from the plans in the pre-application and the Council's response.</p> <p>DEMONSTRATING THAT THE EXCLUSIONARY QUESTIONS HAVE BEEN MISAPPLIED IN THE SITE SELECTION PROCESS The questions in bold below are the exclusionary questions which were used as part of the site selection process. After each question, we have outlined our response. Is the SHLAA site fully or partly a commitment? Or is the site fully or partly within a Principal Employment Area, or other existing development plan allocation? The site is not an employment area, but it is allocated as 'open space' in the existing development plan allocation. However, as we shall demonstrate this allocation is now historic as another use, namely recreation, has been implemented via various planning consents. Or is the site isolated from the urban edge of the settlement i.e. not adjacent to the settlement boundary and not adjacent to a SHLAA site that</p>				

is? No, it immediately abuts the existing settlement boundary and is naturally bounded to the west and south by roads and to the east and north by residential development.

Is the site fully or partly within the settlement boundary (31)? The site is not within the existing settlement boundary. However, as will be apparent from the plan the inclusion of the site is a natural extension of the boundary up to the A345 with the settlement boundaries already on the northern, eastern and southern boundaries. A settlement boundary has to be flexible to meet the new demands, otherwise, by definition, boundaries would never change which is untenable. The two new sites being brought forward are S98/3154 and 3179, both of which are outside the existing boundary.

Is the site fully or partly within one more of the following environmental designations of biodiversity or geological value (i.e. SAC, SPA, Ramsar sites, National Nature Reserve, Ancient Woodland, SSSI)? No, the site is not.

Is the site fully or partly within green belt? No.

Is the site fully or partly within flood risk areas, zones 2 or 3? No. See the Exclusionary Plan in Appendix 2.

Is the site fully or partly within areas involving any of the following internationally or nationally designated heritage asset (i.e. World Heritage Site, Scheduled Ancient Monument, Historic Park and Garden, Registered Park and Garden, Registered Battlefield)? No, the site is not. However, the site, along with all sites in Durrington, is in an area of significant archaeological interest, being near Stonehenge and Durrington Walls. This would need to be addressed in any planning application with an excavation report. However, this is a procedural issue, which has no bearing on the allocation of the site for housing and other uses.

DEMONSTRATING THE EXISTING USE OF THE SITE FOR RECREATION, WHICH IS ALREADY A DEVIATION FROM THE ALLOCATED USE IN THE SALISBURY DISTRICT LOCAL PLAN 2011

Site 3410 was excluded at stage 2 of the SHLAA process. We understand that this decision was made because the Salisbury District Local Plan of 2011, policy R10, has allocated the site as 'public open space'. This is a flawed approach because of the history of the site, the ownership and the current, planning consented, use.

The site has been let by Durrington Square Limited to Durrington Town council since December 2005, but their current lease is ending on 2nd December 2017. Historically the ownership of the site was fragmented and there were no submissions by the owners when the 2011 Plan was being prepared. As a result, we are informed that the site was allocated for the then apparent use by default. However, the allocation of the site as 'open space' is now historic and has been superseded by planning permissions since this allocation was first made. Consequently, the 'open space' use is no longer applicable in any event. The site is now in recreational use, including a BMX bicycle course and an associated building. Copies of the planning history decisions are in Appendix 3. The site is in private ownership and uses within the existing planning consents are being considered, none of which will be for 'public open space' yet all such uses will comply with the existing planning consents for recreation and BMX biking. Furthermore, the owners will have to make the site secure and stop any access on expiry of the lease, if/when the property is handed back purely from a security point of view. The open space use will, therefore, not be continuing long term in a public context.

COMMENTS UPON THE PRE-APPLICATION SUBMITTED IN 2015.

The owners submitted a pre-application in 2015 with a scheme. The pre-application, the scheme and the Response from Development Services South of Wiltshire Council is contained in Appendix 4.

The Response was thorough and, in general, supports the housing use were it not for the R10 open space designation. The pre-application Response highlights some misconceptions with regard to the R10 designation, which are answered in the paragraph on this page outlining the ownership and lease history. In particular, the impact of the ownership and lease on the historical zoning of the site for R10, open space use. The Response has comments in three categories. First, there is the pure planning view by reference to the National Planning Policy Framework (March 2012) and the Adopted Wiltshire Core Strategy. In essence, our site is designated Public Open Space by policy R10. There is also reference to the Durrington boundary. The boundary is inevitably a flexible line which needs to adapt to changing circumstances in the way that has the least impact. Our site is natural infill being bounded by existing housing and a road, which forms a sensible and clear boundary limit.

	<p>The second category of Responses do not object to development but address requirements of any development, such as affordable housing and the works needed to connect utilities. These Responses are relevant once the principle of development is established, but would not be an impediment to development.</p> <p>The third category of responses relate to archaeological matters given the proximity of the site to Stonehenge and Durrington Walls. All of the issues raised in the Response can be addressed and dealt with as part of the normal planning process for Durrington and would not be an impediment to a housing use. The site is outside the World Heritage Sites zone (see the Exclusionary Plan in Appendix 2), however it is in an area where archaeology needs to be carefully considered.</p> <p>Excavations would be needed as part of any planning application, but again, this would not stop any development, but would merely need to be carried as part of the planning application and development process. All of Durrington has some relics and it is a question of managing the process. For example, we are not aware that thorough extensive excavations have occurred for those sites allocated (S98, 3154 and 3179), yet they will be needed.</p> <p>The Response refers to sight lines in the context of heritage sites. In fact, the site is bounded by houses on the south and eastern sides and is sloping which means that the site is hidden from view except from the A345 to the west.</p> <p>In summary, the grounds for a refusal would be the same as the reason the site was rejected at stage 2 in the SHLAA process. That is to say, the R10, public open space zoning under the existing Plan. As we have stated, we consider this to be misconceived.</p> <p>COMMENTARY ON DEMAND FOR USES</p> <p>There is a well-publicised shortage of housing in Great Britain. The WHSADPD has assessed housing requirements and how those are going to be met. The key issues which may not have been fully taken account include:</p> <ul style="list-style-type: none"> a) There have been thousands of soldiers returning from Germany. (see articles in Appendix 5). b) Infrastructure is required in the form of schools and medical facilities to meet the influx as well as the existing population. We are exploring at a local level, which facilities are needed. These include a doctor's surgery as the current one is about to close and a dentist's surgery to cater for the growing population. We are actively investigating ways of incorporating these within our site. c) Durrington potentially offers less expensive housing than, say Salisbury, the main settlement in South Wilts, where house prices are some 30% higher. In the Page 349, para 3.6.3 of the BNP Paribas Report within the Draft Wiltshire House Allocations Plan dated 20th June 2017 submitted to Councillors it is stated that the average new build sale price of £3,205 per sq m for south Wiltshire. Whilst we agree this might be an average, the figure is less for Durrington and more for, say, Salisbury. d) We have marketed the site for residential use and the response has been positive, subject to the site being allocated for housing. This is indicative of demand. <p>CONCLUSION AND SUBMISSION</p> <p>Based upon this information we consider that site 3410 should be allocated for housing with supporting infrastructure facilities to meet evident requirements in Durrington and the surrounding areas.</p>
<p>Attached files (Please see Objective)</p>	<p>4712253</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>It will enable points to be clarified if necessary. It will be possible to answer any queries the inspector might have about our site both generally and in the context of other sites.</p>

Comment ID:	1101	Consultee Mr Robert Wort Durrington Square Limited	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126914		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Objective 2: To help demonstrate a rolling five year supply of deliverable land for housing development - a duty on each Local Planning Authority required by the National Planning Policy Framework. Our comment – To have a five year supply in Durrington requires more planning than most areas because of the archaeological considerations. All sites will require detailed excavations which means that sites will not come on stream as quickly as perhaps envisaged. Surely it is better to err on the side of caution and allocate extra sites to overcome this problem. After all, the market will determine the demand and additional supply will, if anything, reduce house prices, making them more affordable, which must be a good thing.				
Attached files (Please see Objective)	4712253				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It will enable points to be clarified if necessary. It will be possible to answer any queries the inspector might have about our site both generally and in the context of other sites.				

Comment ID:	1102	Consultee Mr Robert Wort Durrington Square Limited	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126914		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		One has to question whether s98 and 3154 will be developed as they are reliant on access from the site between them which received a planning consent in 2008, yet has not been developed. Plans showing the settlement boundary, existing and proposed is in Appendix 1 together with plans showing s98/3154 and 3179.			
Attached files (Please see Objective)		4712253			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		It will enable points to be clarified if necessary. It will be possible to answer any queries the inspector might have about our site both generally and in the context of other sites.			

Comment ID:	1103	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I wish to object to the proposed selection of Site1021 Church Lanein Trowbridge on the grounds that it will have a detrimental effect on the wellbeing of many local people.</p> <p>The area proposed for development is part of the green buffer between Trowbridge and Southwick, and lies alongside theSouthwickCountryPark. This is the first real piece of rural countryside when exiting Trowbridge southwards along the A361.Church Laneretains its aged rural nature, old trees and ancient hedgerow, drainage ditch – all populated by birds and wildlife and with paddocks to the south of Church lane occupied by horses and sheep. The lane remains unadopted and with minimal street lighting. As a no-through road it remains narrow and peaceful. The lane probably sees more foot traffic than motor vehicles as it is well used by local people getting toFrome Road, by dog-walkers and by cyclists. As a ‘green lung’ on the south side of the town of Trowbridge the ‘site’ is clearly visible to passers-by and by visitors to the Southwick Country Park, and much of it is accessible to the general public.Church Lane remains a quiet and safe route for horses and their riders, for mothers with prams and young children and other pedestrians. Site 1021 is currently recreational land and the views towards the Southwick Country Park are a very valuable asset to local residents, dog-walkers and all other passers-by. Local children play happily onChurch Laneand sometimes watch and talk to the horses in the paddocks.</p> <p>The area of Site 1021 is a particularly valuable landscape for a number of local groups that use the church hall including Scouts and Guides, play groups and groups of people with disabilities. The peaceful rural landscape and wealth of flora, fauna, birds and other wildlife including deer and the rare Bechstein’s Bats here are all of great educational and leisure benefit to such groups of local people.</p> <p>For one local man in particular Site 1021 is crucial. The man in question has severe physical disabilities and little speech. He can only get around by use of a wheelchair. Nevertheless, most days of the year he drags himself in his wheelchair several hundred metres alongFrome Roadat some considerable effort, despite the noise and polluted air on the very busy A361 all the way toChurch Lane. He then wheels himself 20 metres along the lane, turns off the road and up to the gate overlooking the paddocks that look towards Southwick Country Park.</p> <p>The man will sit here in his wheelchair enjoying the peace and quiet of this view, and soaking up the sun sometimes for 2 or 3 hours on a pleasant day. I have seen the horses in the paddock wander up to the gate to be near to him. How can you place a value on this locality and this daily experience for this man and others like him?</p> <p>For most local people the threat of turning this unique rural corner of Church Lane into just another modern housing estate represents a potential permanent loss of an ancient rural corner of Trowbridge, the loss of a tranquil lane where wildlife remains to enrich our lives, and a very welcome green relief to our hectic modern lives from the noise, dirt, traffic and tarmac of the busy town.</p> <p>For the man in the wheelchair the loss of this tranquil field, the view, the peace, and his friends – the horses, could be a devastating, morale-shattering personal tragedy.</p>				
Attached files (Please see Objective)						

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1104	Consultee Mr & Mrs Paul and Lynn Stoney Person ID: 1125563	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	S1027, S1028			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2) Flood risk and the high water table in Salisbury. –</p> <p>We attended the consultation meeting in the Guild Hall on 19th July. There were tables with the maps spread out. Although the proposed building sites were highlighted, the river systems were not, and the existing roads and pinch points were not. These pinch points consist of places where major roads are carried across the rivers, or points at which major roads pass under the railway. Of course by definition a map is a 2-dimensional representation, but these maps had nothing on them that made for real consultation. They did not show areas of question and concern, and they did not show any awareness on the part of the developers about the geographical limitations and realities raised by the proposed developments.</p> <p>There was a representative for the consultation at the table. We asked her about the flood risk for site 1027. She replied that the environment agency has it designated as a non-flood risk area. If you pass that field in the winter when it is wet, it is always flooded. If you walk across the field, what you will come to is the river (not highlighted in the maps) and it is a flood plain. The houses in the adjoining St George's close development arguably should not have been built there and people who live in that development have given anecdotal reporting about the problems.</p> <p>Building such a huge number of houses on site S1028 will significantly reduce the absorbency of these fields and hill slopes which will cause a great increase in run-off water down onto the Netherhampton Road and the already flood-prone S1027 towards the river.</p> <p>Another man who was looking at the maps as well, showed the representative how the Ring road which goes round the east and north sides of the city was abandoned at the point where it was supposed to join Churchfields to the west and south because concrete pillars would have had to have been built to get it across the very high water table.</p> <p>The representative seemed ignorant of these considerations. We pointed out to her on the developers' own maps where the river systems run. The were marked on the map but not highlighted and so did not make visible the challenge of the sites proposed.</p> <p>1) Justified/Not justified: We understand that more housing is needed. People need decent places to live, and affordable places to live. We need more socially-affordable housing. However we doubt very much whether developers are the people to deliver this. We also have to live for ever with the consequences of ill-thought-out changes or decisions based on cost-cutting or corporate money-making considerations. These far-reaching decisions must be based upon consideration of what is really needed. I personally believe that the policy of adding house-building to preexisting urbanised areas, especially in a beautiful county such as Wiltshire, needs to be re-examined.</p> <p>2) Effective/Not effective: We believe this is a piecemeal proposal where a holistic planning strategy is needed. No more houses can be built until this is done. There needs to be a thorough review of the transport infrastructure around Salisbury before any more housebuilding can take place. There should also be a better analysis of the flood risks when building new houses on S1027 and S1028.</p> <p>3) Positively prepared/Not positively prepared: We believe there is a real case for creating a new market town for example, on the garden city lines, where the infrastructure would be able to cope because it was planned for; where there would be doctors' surgeries and schools as well</p>				

	<p>as roads and houses, efficient transport links to other centres, rather than overwhelming existing infrastructures that simply cannot cope because they are already overburdened.</p> <p>4) National policy: We have not had time to study the national policy and so cannot comment as to whether this proposal is in line with it. However, river systems and the facts of physical geography have to be taken into account whether or not national policy aligns with it.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1105	Consultee Mr & Mrs Paul and Lynn Stoney Person ID: 1125563	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	S1027, S1028			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Therefore: -</p> <p>3) Lack of confidence in the quality of the consultation: - Our concern at the lack of apparent awareness of issues by the developers. At the meeting in Harnham on Sept 6th we learned that when the MacDonald's Drive-Thru was being proposed on the Southampton Road, the Highways Agency turned out to have got their figures wrong on the traffic volumes. In this proposal we cannot even believe they have studied the matter. In this consultation we were told the Environment Agency does not define as a flood-risk area an area which we know for a fact floods frequently and is part of a flood plain. We have no confidence in the consultation. To have a one-day event on July 19th in the holiday period, when this issue is so extremely important to so many people, seems to suggest that the developers are not genuinely interested in a real consultation.</p> <p>1) Justified/Not justified: We understand that more housing is needed. People need decent places to live, and affordable places to live. We need more socially-affordable housing. However we doubt very much whether developers are the people to deliver this. We also have to live for ever with the consequences of ill-thought-out changes or decisions based on cost-cutting or corporate money-making considerations. These far-reaching decisions must be based upon consideration of what is really needed. I personally believe that the policy of adding house-building to preexisting urbanised areas, especially in a beautiful county such as Wiltshire, needs to be re-examined.</p> <p>2) Effective/Not effective: We believe this is a piecemeal proposal where a holistic planning strategy is needed. No more houses can be built until this is done. There needs to be a thorough review of the transport infrastructure around Salisbury before any more housebuilding can take place. There should also be a better analysis of the flood risks when building new houses on S1027 and S1028.</p> <p>3) Positively prepared/Not positively prepared: We believe there is a real case for creating a new market town for example, on the garden city lines, where the infrastructure would be able to cope because it was planned for; where there would be doctors' surgeries and schools as well as roads and houses, efficient transport links to other centres, rather than overwhelming existing infrastructures that simply cannot cope because they are already overburdened.</p> <p>4) National policy: We have not had time to study the national policy and so cannot comment as to whether this proposal is in line with it. However, river systems and the facts of physical geography have to be taken into account whether or not national policy aligns with it.</p>			
Attached files (Please see Objective)				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?				

Comment ID:	1106	Consultee Mr & Mrs Paul and Lynn Stoney Person ID: 1125563	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	S1027, S1028				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	4) Disappearance of open spaces: - I oppose ribbon development. It just spoils places. These beautiful open spaces need to be preserved around the city. It is what Salisbury is known for, 'The City in the Country'- not 'The City in the Urban Sprawl becoming more like Croydon every day.' Wildlife habitats must be preserved and the open spaces which modulate our physical and mental health, leisure and breathing spaces are needed, not just optional extras. Many, many people enjoy walking along those fields and field edges. I am one of them. 1) Justified/Not justified: We understand that more housing is needed. People need decent places to live, and affordable places to live. We need more socially-affordable housing. However we doubt very much whether developers are the people to deliver this. We also have to live for ever with the consequences of ill-thought-out changes or decisions based on cost-cutting or corporate money-making considerations. These far-reaching decisions must be based upon consideration of what is really needed. I personally believe that the policy of adding house-building to preexisting urbanised areas, especially in a beautiful county such as Wiltshire, needs to be re-examined. 2) Effective/Not effective: We believe this is a piecemeal proposal where a holistic planning strategy is needed. No more houses can be built until this is done. There needs to be a thorough review of the transport infrastructure around Salisbury before any more housebuilding can take place. There should also be a better analysis of the flood risks when building new houses on S1027 and S1028. 3) Positively prepared/Not positively prepared: We believe there is a real case for creating a new market town for example, on the garden city lines, where the infrastructure would be able to cope because it was planned for; where there would be doctors' surgeries and schools as well as roads and houses, efficient transport links to other centres, rather than overwhelming existing infrastructures that simply cannot cope because they are already overburdened. 4) National policy: We have not had time to study the national policy and so cannot comment as to whether this proposal is in line with it. However, river systems and the facts of physical geography have to be taken into account whether or not national policy aligns with it.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1107	Consultee Mr & Mrs Paul and Lynn Stoney	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125563	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027, S1028		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		1) Justified/Not justified: We understand that more housing is needed. People need decent places to live, and affordable places to live. We need more socially-affordable housing. However we doubt very much whether developers are the people to deliver this. We also have to live for ever with the consequences of ill-thought-out changes or decisions based on cost-cutting or corporate money-making considerations. These far-reaching decisions must be based upon consideration of what is really needed. I personally believe that the policy of adding house-building to preexisting urbanised areas, especially in a beautiful county such as Wiltshire, needs to be re-examined.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1108	Consultee Mr & Mrs Paul and Lynn Stoney	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125563	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027, S1028		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		2) Effective/Not effective: We believe this is a piecemeal proposal where a holistic planning strategy is needed. No more houses can be built until this is done. There needs to be a thorough review of the transport infrastructure around Salisbury before any more housebuilding can take place. There should also be a better analysis of the flood risks when building new houses on S1027 and S1028.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1109	Consultee Mr & Mrs Paul and Lynn Stoney	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125563	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027, S1028		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		3) Positively prepared/Not positively prepared: We believe there is a real case for creating a new market town for example, on the garden city lines, where the infrastructure would be able to cope because it was planned for; where there would be doctors' surgeries and schools as well as roads and houses, efficient transport links to other centres, rather than overwhelming existing infrastructures that simply cannot cope because they are already overburdened.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1110	Consultee Mr & Mrs Paul and Lynn Stoney	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125563	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027, S1028		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		4) National policy: We have not had time to study the national policy and so cannot comment as to whether this proposal is in line with it. However, river systems and the facts of physical geography have to be taken into account whether or not national policy aligns with it.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1111	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There's stated an 'Indicative residual housing requirement of 47 dwellings. This is indicative, not absolute, and takes no account (as does not the overall process) of numbers of people that would benefit.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1112	Consultee Mr Patrick Kinnersly White Horse Alliance Person ID: 487991	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Preamble The White Horse Alliance is a coalition of national, regional and local environmental groups and parish councils campaigning for sustainable transport and spatial planning in West Wiltshire and along what Wiltshire Council calls the ‘A350 economic growth corridor’. In view of the council’s interest in developing a fast route from the M4 to the Channel Ports we also keep a watchful eye on transport and planning matters along the A350 through Dorset and along the A36 eastwards to Salisbury and the container port at Southampton.</p> <p>Summary We oppose the draft Housing Sites Allocation Plan because it cannot achieve sustainable development. The plan proposes further significant growth in housing numbers in the Trowbridge area without an overall spatial plan for dealing with the resulting impacts on transport systems, social infrastructure and the environment. The plan would locate a disproportionate burden of new development in communities around Trowbridge, shrinking the open space between town and villages and eroding natural habitats required for the conservation of European protected species.</p> <p>The council admits that the ‘need’ for most of these new homes - 1000 out of 1,220 – arises because the Ashton Park urban extension will not provide its full allocation of 2,600 dwellings before the end of the plan period in 2026. Sites for 1,000 homes therefore have to be found in the Trowbridge community area. The delay in construction of Ashton Park is blamed on the need to prevent the development and the A350 Yarnbrook-West Ashton relief road - an integral part of the scheme - harming the breeding colonies of Bechstein’s bats that roost in ancient woodlands to the SE of the site. Harming the conservation of this European species would damage the integrity of the European site established for their protection, the Bath and Bradford on Avon Special Area of Conservation (SAC). That would be in breach of the European Habitats Directive and the UK’s Habitats Regulations 2010. The development would then be unlawful and planning permission would have to be refused.</p> <p>While we can sympathise with the problems imposed on local authorities by the government’s imposition of arbitrary but rigid housing quotas in each housing market area (in this case including Chippenham as well as Trowbridge), Wiltshire Council’s difficulties at Ashton Park are entirely of its own making. The presence of breeding colonies of Bechstein’s bat in woods to the SE of Trowbridge has been known since 2003. WC’s predecessor, WCC, was warned at the time by its own ecologist that development in this area might be in breach of the Habitats Directive. Natural England repeated the warning in 2009 when WC published its first draft of the Core Strategy. At the Examination in Public of the Core Strategy in 2013 our ecological adviser Prof John Altringham predicted that the Ashton Park development could lead to the eventual extinction of these bat populations.</p> <p>The council and the developer appear to have ignored all these warnings until it was far too late to rethink its spatial strategy. It is now devising a new master plan for Ashton Park and a new mitigation strategy to reduce the ecological impact of the new section of A350. This calls into question the soundness of a plan based on creating a very large estate reliant on a very large road to handle the traffic problems that result from building massive car-dependent estates remote from towns and services. Did the council’s ambition to build a new section of the A350 ‘growth</p>				

	<p>corridor’ drive it to create an urban extension large enough to yield an £11.5m contribution from the developer towards the £17m cost of the road? We think it did.</p> <p>The communities around Trowbridge will pay the price for this upside-down approach to spatial planning. After 2026 they will be accommodating not only the 1,000 extra ‘AshtonPark’ homes but also the delayed 1,600 originally planned for the large area of farmland allocated for housing and industrial development in the open countryside between Paxcroft Mead, West Ashton and Yarnbrook.</p> <p>The Bechstein’s and other bat species will also pay a price in further habitat loss. As the council has acknowledged, most of the sites now proposed for development are used by foraging and commuting bats – see below.</p> <p>The framework documents that should guide and underpin the housing growth now proposed by the council are out-of-date and incomplete. Work on the Transport Plans that were supposedly integral to the Wiltshire Core Strategy appears to have stopped in 2012. Much the same applies to the equally central Green Infrastructure Strategy.</p> <p>In the absence of these tools for joined-up planning the council has inevitably failed to comply with sustainable development policies embodied in its own Core Strategy and in the National Planning Policy Framework (NPPF).</p> <p>As a result Wiltshire Council has undermined the Local Development Framework, rendering the Local Plan unsound and ineffective.</p> <p>Conclusions</p> <p>Wiltshire’s transport and spatial planners and ecologists face an uphill struggle if they are to rescue a sustainable development plan from the mess that has resulted from ignoring early warnings about the environmental constraints facing any large-scale development in the area to the SE of Trowbridge. We doubt if that will be possible.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1113	Consultee Mr Patrick Kinnersly White Horse Alliance Person ID: 487991	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Local Plan policies - Brown-field last? The proposed wave of new estates depositing 1,000 more homes on farmland round Trowbridge highlights the council's failure to achieve any prioritisation of brown-field sites, as envisaged in the Core Strategy and encouraged in Para 17 of the NPPF.</p> <p>The long-derelict Bowyers factory in Trowbridge stands as a monument to this absence of imagination and resolve in pursuing sustainable development. This massive site has for years presented the council with an opportunity to achieve several of its own objectives for sustainable development.</p> <p>The most obvious of these is transport integration. Core Policy T4 identifies the need for a Transport Strategy for Trowbridge. The strategy should identify a package of measures including 'Interchange enhancements that are accessible by all.'</p> <p>'Transforming Trowbridge – Scoping and Vision Study' (August 2010) recognises that 'The town has a below national average usage of public transport, exacerbated by the lack of a bus depot facility and poor bus terminus facilities' and admits that 'The rail station is poorly integrated with the town centre and other transport modes and there is low provision of safe pedestrian and cycle routes.'</p> <p>The 'emerging' Trowbridge Transport Strategy set out five 'components'. Under 'Public transport' it listed 'Improvements to Trowbridge rail station, including redesigned station forecourt and interchange area.'</p> <p>Why have the Bowyers site and adjacent railway land not been developed so as to provide not just a transport interchange but a multi-functional centre of the kind seen in small towns on the Continent? Instead of the present dismal prospect confronting travellers arriving in the county town, they could for a start find a welcoming café-bar. The site could also provide housing in the form of high-density affordable apartments (with limited remote parking). In pursuit of more skilled and more diverse employment opportunities, there could be a cluster of affordable small units for offices, start-up enterprises, workshops, craft studios and small shops. We suspect that the ongoing dereliction stems from councillors and planners relying on the usual template for off-the-peg economic growth - 'waiting for the Big Developer' to come up with the funding for a clone-town commercial centre with abundant parking for more chain-store brands and fast-food outlets. The redevelopment of Chippenham station seems to have fallen into this trap.</p> <p>LEP funding could have been sought for such a development, as at Chippenham station, had the council not been so determined to devote a total of £17m of LEP and developer funding to building another section of its A350 growth corridor, between Yarnbrook and West Ashton.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1114	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Transport planning - a catalogue of undelivered aspirations</p> <p>The Wiltshire Core Strategy Pre-submission Document set out overarching key principles to guide the development of its transport strategy. The first of these was 'Providing for the most sustainable pattern of development that minimises the need to travel and maximises the potential to use sustainable transport.'</p> <p>Policy T4 identifies the need for a Transport Strategy for Trowbridge. The strategy should identify a package of measures that will need to be implemented within the Core Strategy period, and should consider the following:</p> <ul style="list-style-type: none"> * New and improved networks of routes for pedestrians and cyclists; * Enhanced public transport services and facilities; * Traffic management measures; * Demand management measures; * Selective road improvements; * Interchange enhancements that are accessible by all; and * Smarter choice measures. <p>'Transforming Trowbridge – Scoping and Vision Study'. A number of key challenges are identified:</p> <ul style="list-style-type: none"> * The movement of traffic through town needs to be addressed to improve the current town environment for pedestrians; * The town has a below national average usage of public transport, exacerbated by the lack of a bus depot facility and poor bus terminus facilities; and * The rail station is poorly integrated with the town centre and other transport modes and there is low provision of safe pedestrian and cycle routes. <p>Other stalled plans</p> <p>Wiltshire Local Transport Plan 2011-2026: Latest version appears to be March 2011.</p> <p>Salisbury Transport Strategy: no update since 'Summary' published in November 2012.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1115	Consultee Mr Patrick Kinnersly White Horse Alliance Person ID: 487991	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Green infrastructure (GI) There is no adopted green infrastructure plan. The current draft Wiltshire Sites Allocation Plan recognises that a GI strategy is ‘essential’ to realising the objectives of Core Policy 52. However no progress seems to have been made towards adoption of a plan in the five years since the council published a nine-page Green Infrastructure Strategy update in January 2012.</p> <p>This is a cause of special concern to our member groups. Green infrastructure is vital for any effective mitigation strategy for reducing the adverse impact of these developments on bat populations in an area where patches of natural habitat are shrinking and becoming ever more fragmented. GI strategy can protect and enhance natural features such as hedgerows that support existing flight lines and potential commuting routes between summer roosts and the hibernation roosts in the SAC areas of Bradford and Box.</p> <p>Since the Examination in Public of the Core Strategy in 2013 the WHA has consistently called for the council to promote the mapping of commuting routes between summer roosts and hibernation sites (as pioneered by Natural England when it mapped the strategic flyways serving the South Hams SAC for greater horseshoe bats in south Devon). Some mapping of flight lines has been done for the developer in the case of the Ashton Park development but the council has consistently resisted mapping and safeguarding – let alone creating - green corridors extending beyond the boundaries of individual sites and beyond the funding provided by the developers of those sites.</p> <p>The fresh wave of large housing sites now proposed in the heart of the SAC ‘planning guidance zone’ makes it even more urgent to add this as a requirement to the GI strategy and then complete the strategy without further delay. The council has acknowledged that the majority of proposed sites in villages around Trowbridge could impose adverse impacts on bat populations linked to the Bath and Bradford SAC:</p> <p>‘In the face of the need to identify sites for additional housing at the town, there are significant ecological, landscape (Green Belt) and infrastructure constraints that significantly limit the choice of available sites. Assessment evidence demonstrates three considerations to be addressed in order for housing development to be accommodated: Ecology: an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats. To address this issue, the Habitats Regulations Assessment (HRA) for the Plan recommends developing a strategy for managing recreational pressure across the town. Detailed design and layout of schemes would need to consider additional planting and open space to protect and enhance these BAP priority habitats and thereby augment opportunities for bat foraging routes and roosting sites. This could include establishing dark corridors through sites to protect foraging routes and roosting areas for bats. Specific measures that will be required are explained for each site.</p>				

	The text above and the site descriptions below are taken from the Cabinet Version (June 2017) Appendix 1: Draft Wiltshire Housing Site Allocations Plan. Text relating to bat conservation and the SAC is in italic.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1116	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Hilperton Gap Approximately 16.33ha and 205 homes 'The existing natural features of the site are significant in the landscape and would be incorporated within the detailed layout. These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species.'				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1117	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Elm Grove Farm 'Approximately 14.33ha of land at Elm Grove Farm is allocated for the development of approximately 200 dwellings. The existing natural features of the site are significant in the landscape and would need to be incorporated within a detailed layout. 'These features also provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. These elements should be protected and enhanced where possible by additional planting with native species. 5.48 The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. '</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1118	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>North Bradley 'Approximately 25.26ha [including land used for grazing – important for foraging GH bats - PK] off the A363 south-west of the White Horse Business Park is allocated for the development of approximately 150 dwellings. The site is characterised by a distinctive pattern of mature and semi-mature hedgerows and trees that form a feature in the landscape. Development of the site would need to retain these features and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design. Existing hedgerows and trees also provide habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, 'dark corridors' for foraging bats. 5.54 The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Woodland belts associated with the White Horse Business Park • Network of hedgerows • Grounds of Willow Grove. <p>'5.55 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Mitigation Strategy.'</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1119	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Southwick - Southwick Court 'Approximately 18.17ha of mainly agricultural land at Southwick Court is allocated for the development of approximately 180 dwellings. 'The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC.'				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1120	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Upper Studley 'Approximately 2.33ha of land allocated for the development of approximately 20 dwellings. The site is in an area likely to be used by Bechstein's bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: • Boundary hedgerows / tree lines • Lambrok Stream. '5.72 These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will be required to contribute towards the delivery of the Trowbridge Mitigation Strategy.'				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1121	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is worth noting that the total area of land occupied by the above sites represents a loss or deterioration of natural habitat amounting to more than 80 hectares. Such a loss cannot be made good by 'mitigation'.</p> <p>Much of the development now proposed falls within the 'consultation zones' laid down in 'Bat Special Areas of Conservation (SAC) Planning Guidance for Wiltshire' (See maps on pages 8 & 9 of the September 2015 edition.) The guidance says that 'Mitigation strategies for European protected species cannot legally be obtained by condition.' It goes on to explain that 'All mitigation land should be transferred to a single responsible body and should be visible and accessible to facilitate effective compliance, monitoring and enforcement. It is not acceptable to rely on land in multiple and / or private ownerships e.g. private gardens, as appropriate management of such features cannot be secured for the long term – conditions would be unenforceable.'</p> <p>The Bats SAC planning guidance sets demanding standards if developments are to comply with European and UK biodiversity law. The WHSAP proposes that 'Development will be required to contribute towards the delivery of the Trowbridge Mitigation Strategy.' We look forward to studying this document and seeing if it meets the standards laid down in the planning guidance, eg by transferring bat commuting corridors and other GI infrastructure to a single 'responsible body' rather than leaving them scattered among commercial developers.</p> <p>All these matters will have to be finalised before finalising a rigorous Habitats Regulations Assessment of the sites plan. All new developments and associated infrastructure will have to be added to the list of plans and projects to be assessed for their in-combination effect on the integrity of the SAC.</p> <p>Because most new housing sites in the WHSAP could potentially threaten the conservation of European bat species and therefore the integrity of the Bath and Bradford bats SAC, they will also have to be added to the list of plans and projects to be assessed for in-combination effects on the SAC as part of the HRA of Ashton Park and the A350 relief road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1122	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GI and sustainable transport We welcome the way WC planners have seen the need to connect these new developments to Trowbridge or other settlements by footpaths and cycleways. Reliance on developer-funding leads to the risk that, as with the creation of green corridors for wildlife, this additional infrastructure will not actually materialise, negotiated away during bargaining over financial viability as it competes with affordable housing, new roads and extra provision for education and healthcare. Rapid completion of a GI Plan and a Transport Plan is now more urgent than ever so that these green corridors can be enshrined in policy and funded by the council as essential infrastructure.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1123	Consultee Mr Patrick Kinnersly White Horse Alliance	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 487991	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>More traffic and air pollution The council's spatial planners are to be commended for recognising the traffic-generating potential of the proposed new housing estates and aspiring to connect them by walking and cycling routes. However, without the provision of much better bus services it is inevitable that these developments will add traffic to local and strategic road networks, increasing air pollution in the area.</p> <p>The environmental statement for the Ashton Park development acknowledged that traffic pollution from the development would pose a threat to several areas of ancient woodland in the area, including the Picket and Clanger woods SSSI. The developer's ecologists claim that the harmful effects of Nitrogen oxide emissions can be mitigated by sustainable transport provision. All the woods identified by modelling to be at risk from NO2 provide core roosts for the bats SAC.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1124	Consultee Miss Rita P Molland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128746		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to lodge my objections to the above proposed development, believing the plan to be unsound.</p> <p>The main points that concern me are:</p> <p>The increased traffic that will be generated. Has this been investigated? If each house has even only one car (but many have 2 or more nowadays) that will be another 640 (or 1280 +++) cars on the road every morning. One assumes most of residents will be coming this way (not through Wilton) to get to work in Bournemouth, Southampton etc. or supermarkets. Recently it has been getting more and more difficult to exit St Mary's Road, as frequently the traffic is backed up from the gyratory past the road entrance and this can only get worse.</p> <p>All traffic coming along Harnham Road has to go through the Gyratory which is, I understand, already operating at almost maximum capacity. How can it cope with hundreds more vehicles?</p> <p>Apart from the traffic generated by the new residents there will be excavators, builders' lorries etc all that have to come through Harnham to reach the site. There are two schools as well as some old people's homes situated on or just off the road.</p> <p>Harnham Road is already a dangerous road with many HGVs including cattle lorries with live animals. Recently a man died as a result of a collision with such a lorry.</p> <p>Has provision been made in the plans for essential services such as doctors, schools, a church or a shop? if not then people will need to go elsewhere thus increasing the traffic flow even more.</p> <p>The fields on the north side of the road flood regularly in the winter - not a good place for houses. I have grave concerns that the northern development will have upon the flooding. I remember some years ago when a Link Road to Churchfields Trading Estate was mooted and it would have had to be built on stilts to avoid the flooding.</p> <p>I have lived in St Mary's Road since October 1970 and prior to this date knew someone who lived just round the corner in Harnham Road. I remember distinctly their garden being more than halved in size when the road was widened in the late sixties - to cope with all the additional traffic will really need a wider road - but there is just no more space to widen it. Also there was a beautiful line of mature trees further back along the road towards Folkestone Road, all of which were felled to achieve this so-called "progress".</p> <p>Finally. what a shame to spoil the only really delightful way to approach the city by building on beautiful, productive green fields, when an alternative brown field site could be sought for.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1125	Consultee Mrs Sarah Elphick	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126925		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	A recent survey was undertaken on 21st July 2017. Trenches were dug prior to heavy rain that followed. These showed that the water table, even after a long dry spell was approximately as little as 30cm below the surface. One was on low ground and another further up the field. After rain, the water table rose to be level with the field grass. The fields either side of Lambrok stream often become flooded over a large area after heavy rain. Surely it can't sit well on the shoulders of cabinet members to willingly destroy part of Lambrok stream and also the partial or complete destruction of the tree lined brook that is hundreds of years old.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1126	Consultee Mrs Sarah Elphick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126925	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Surely it can't sit well on the shoulders of cabinet members to willingly destroy part of Lambrok stream and also the partial or complete destruction of the tree lined brook that is hundreds of years old.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1127	Consultee Mrs Sarah Elphick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126925	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to protest most strongly at Wiltshire Councils proposal to take a wrecking ball to its CORE STRATEGY adopted in 2015 to move the Trowbridge boundary to facilitate the building of a hundred and eighty homes on site 3565 at Southwick Court. It is sheer idiocy to proceed on this farmland and to do so is beyond my comprehension. Building on greenfield sites should only be undertaken when all brownfield sites are exhausted. Yet, this is clearly not the case.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1128	Consultee Mrs Sarah Elphick	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126925		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed cost of these up market properties is likely to attract professionals, who may be less inclined to shop locally or benefit the local community. So why pursue the destruction of green farmland to cater for Bath and Bristol's overspill. Most are unlikely to work in Trowbridge, but will use the services, facilities and amenities. It is far better that Wiltshire Council build reasonably priced homes that are affordable on the abundant brown sites for those who are more likely to work and spend in Trowbridge. These are the very people who will create more demand and encourage the regeneration of the town centre. This is surely what is best for our county town and the cabinet members should be addressing these concerns.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1129	Consultee Mrs Sarah Elphick	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126925		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>One hundred and eighty homes will not support nor merit a new primary school or doctors surgery and will put an unbearable strain on the local community that is already at breaking point. Where will all the extra doctors come from? Most surgeries are over stretched and close to being over subscribed whilst struggling to fill GP vacancies. This is because there are insufficient doctors entering General Practice.</p> <p>The Grove primary school will be the closest to the proposed development and has only limited spaces in a few year groups. Clare Medland; Wiltshire Councils head of school place commissioning (Wiltshire Times 14th July 2017) said that if hundreds of homes are built in Trowbridge and surrounding areas, it would desperately need one or two new primary schools to cater for the incoming pupils. She takes into account the two new schools planned to be built in Ashton Park. It goes without saying that a primary school needs to be within walking distance.</p> <p>The proposed cost of these up market properties is likely to attract professionals, who may be less inclined to shop locally or benefit the local community. So why pursue the destruction of green farmland to cater for Bath and Bristol's overspill. Most are unlikely to work in Trowbridge, but will use the services, facilities and amenities. It is far better that Wiltshire Council build reasonably priced homes that are affordable on the abundant brown sites for those who are more likely to work and spend in Trowbridge. These are the very people who will create more demand and encourage the regeneration of the town centre. This is surely what is best for our county town and the cabinet members should be addressing these concerns.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1130	Consultee Mrs Sarah Elphick	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126925		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to protest most strongly at Wiltshire Councils proposal to take a wrecking ball to its CORE STRATEGY adopted in 2015 to move the Trowbridge boundary to facilitate the building of a hundred and eighty homes on site 3565 at Southwick Court.</p> <p>A recent survey was undertaken on 21st July 2017. Trenches were dug prior to heavy rain that followed. These showed that the water table, even after a long dry spell was approximately as little as 30cm below the surface. One was on low ground and another further up the field. After rain, the water table rose to be level with the field grass. The fields either side of Lambrok stream often become flooded over a large area after heavy rain. Surely it can't sit well on the shoulders of cabinet members to willingly destroy part of Lambrok stream and also the partial or complete destruction of the tree lined brook that is hundreds of years old. It is sheer idiocy to proceed on this farmland and to do so is beyond my comprehension. Building on greenfield sites should only be undertaken when all brownfield sites are exhausted. Yet, this is clearly not the case. One hundred and eighty homes will not support nor merit a new primary school or doctors surgery and will put an unbearable strain on the local community that is already at breaking point. Where will all the extra doctors come from? Most surgeries are over stretched and close to being over subscribed whilst struggling to fill GP vacancies. This is because there are insufficient doctors entering General Practice.</p> <p>The Grove primary school will be the closest to the proposed development and has only limited spaces in a few year groups. Clare Medland; Wiltshire Councils head of school place commissioning (Wiltshire Times 14th July 2017) said that if hundreds of homes are built in Trowbridge and surrounding areas, it would desperately need one or two new primary schools to cater for the incoming pupils. She takes into account the two new schools planned to be built in Ashton Park. It goes without saying that a primary school needs to be within walking distance.</p> <p>The proposed cost of these up market properties is likely to attract professionals, who may be less inclined to shop locally or benefit the local community. So why pursue the destruction of green farmland to cater for Bath and Bristol's overspill. Most are unlikely to work in Trowbridge, but will use the services, facilities and amenities. It is far better that Wiltshire Council build reasonably priced homes that are affordable on the abundant brown sites for those who are more likely to work and spend in Trowbridge. These are the very people who will create more demand and encourage the regeneration of the town centre. This is surely what is best for our county town and the cabinet members should be addressing these concerns.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1131	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the rural landscape of the area As well as offering a rural setting for the heritage assets here, the land between Church Lane and Southwick Country Park provides a part of the green buffer between Southwick and Trowbridge and is well used by local people. The first field has been used for grazing animals for at least the last 30 years and the larger field behind Framfield offers wide ranging views across the countryside, is used by local residents and is home to pairs of deer as well as bats. In 1989 there was an application (w89/0140) to build 2 dwellings on the field behind Church Cottage, Church Lane. This planning proposal was refused on the basis that “the proposed development (of just 2 dwellings) would extend the built-up area into open countryside, detrimental to the character of the area,” (Extract from the decision notice) Also, the Secretary of State further notes (in the appeal document) that “the proposal would harm the rural character of the area” and that “the site is outside the limits of Trowbridge”, which is still the case. Thirdly, the appeal document notes that the Plan “seeks to maintain a rural buffer between Trowbridge and Southwick. The proposal would encroach on open rural land and harmfully effect its appearance.... The appeal site, which is part of a pasture field on the south side of Church lane, is in the pleasant open countryside between Trowbridge and Southwick” If this is the case for 2 dwellings, 45 dwellings would be extremely detrimental to the rural nature of this area. In fact, the addition of Southwick Country Park since this application would further promote the maintenance of this area as rural, alongside maintaining the setting of St Johns Church, former school houses and Church Cottage.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1132	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The consultation document states that there are Bechstein's Bats at the sites behind Church Lane and OldBrick Fields. The document states that bat corridors should be built into any proposed development.</p> <p>When contacting the council regarding the reasons for delay of the West Ashton site, the reason given was "The application has been delayed because the applicant is addressing ecology objections relating to a colony of bats in nearby Biss Wood. It is anticipated that a revised masterplan and environmental statement will be submitted by the applicant to address the objection in the near future, at which time all interested parties will be notified and given a further opportunity to make representations. All things being equal, the application may then be presented to the Council's Planning Committee for determination towards the end of the year."</p> <p>Since there are also bats at The Church Lane site, there is clearly a contradiction. As one of the rarest bats in the UK and Europe the Bechstein's Bat is one of the UK Biodiversity Action Plan species, which means that it is a conservation priority on both a local and national scale. Does Wiltshire Council want to be responsible for destroying the bat's habitat at Church Lane and further jeopardising its survival?</p> <p>National Policy also states:</p> <p>74 - Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> • an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or • the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or • the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. <p>75 - Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p> <p>156 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</p>				
Attached files (Please see Objective)	4712481				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1133	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There was also a historic application (ref APP/F3925/A/02/1082021) regarding an agricultural access off the A361 to the field to the south of Church Lane. This is the proposed site of access to the new dwelling on the Housing Site Allocation Plan. However, when this planning application went to appeal, the Inspector specifically states that there need to be considerations as part of the appeal success. Paragraph 12 states “In the future, for economic reasons, they would expect to lease or rent this land to a local farmer”. On this basis the inspector goes on to say that this purpose “seems to be reasonable and therefore agricultural machinery and transport would require access to the field....tending of livestock would require a small number of visits by light vehicles.....Arable use may well involve particularly large vehicles and plant but only during more restricted periods”</p> <p>Since this application the field in question has not been rented or used for agricultural purposes. The only use is that the field was ploughed once about three years ago, not for arable purposes or to grow crops but seemingly to prevent dog walkers and locals from enjoying the site and countryside. Also, it is clear from the above evidence that the access was granted ONLY for limited agricultural use NOT for construction or residential traffic which would clearly change the local area.</p> <p>Finally, when purchasing 344 Frome Road the new owners contacted the Planning Department at Wiltshire Council regarding future building on the fields that directly backs onto the Grade II listed cottage.</p> <p>In the reply they were informed that “the land that backs onto 344 is outside the development policy boundary for housing and therefore any application to develop the land is likely to be refused by the council.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1134	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>OBJECTION re: Flooding considerations Church Lane Site 1021 - Draft Wiltshire Housing Site Allocations Plan</p> <p>The area of land identified for proposed development of some 45 houses is an area already known to be prone to flooding, particularly during winter months.</p> <p>The southern edge of the proposed development is skirted by Lambrok Stream. Local residents, and anyone who walks in the Southwick Country Park know that in the winter months the landscape around the stream is waterlogged and some paths at the northern end of the Country Park will flood, sometimes for weeks.</p> <p>The gradual progression of global warming and climate change means the trend is towards warmer and wetter winters, and indeed warmer and wetter summers and ever-increasing levels of precipitation.</p> <p>A fluvial flood event was recorded at the proposed development site on 27th December 1979 when for several days the main river flooded when the channel capacity was exceeded. A considerable area of land each side of the stream was flooded.</p> <p>There are many other recorded issues and concerns regarding flooding and flood risk in areas of Trowbridge and nearby hamlets adjacent to the Lambrok Stream, a few of which are quoted below:</p> <p>Heart Radio website reported on 3rd November 2011 that people at risk of flooding from Lambrok Stream in Trowbridge will benefit from improvements to the Environment Agency's free flood warning service. "We know that certain parts of the River Biss, Paxcroft Brook and Lambrok Stream will flood earlier while other areas will flood later and only when the levels continue to rise," said Paul Hardy for the Environment Agency.</p> <p>On 23rd November 2012 the Environment Agency issued flood warnings for Lambrok Stream.</p> <p>3rd March 2015. Twelve neighbours living at Acacia Crescent, Trowbridge raised concerns about flooding relating to Lambrok Stream and planning application 14/06917/OUT for a development of some 30 properties. Their comments included the incidence of recent flood events associated with high water levels in the River Biss, flood water backing up very quickly in the Lambrok stream, rapidly affecting the land to the rear of Acacia Crescent, and threatening the flooding of those properties. Water routinely enters gardens. The Environment Agency issues warnings to these properties as they are in their declared flood zone. The residents stated that one thing they knew for certain was that the Lambrok stream floods after short periods of heavy rain.</p> <p>14th February 2017. The Save Our Southwick campaign group have voiced many objections to the Outline Planning Application 16/12279/OUT by Redrow Homes to build 100 homes on Blind Lane in Southwick village. Aspects relating to flooding and Lambrok Stream relevant to the proposed Church Lane development include: the development is partially on a flood zone 1 and extremely close to flood zones 2 and 3. This area of land is on clay and the water table level is always very close to the surface. When the water flows from the attenuation pond it will feed</p>				

into the Lambrok stream at a single point and this will increase the volume of water being carried off towards Trowbridge. (This suggests that if the Redrow development is approved it could lead to greater flows in Lambrok Stream further increasing the risk of flooding in the vicinity of the proposed Church Lane development, as well as to other residential areas near to the Lambrok Stream throughout Trowbridge). Lambrok stream hasn't been able to cope with the water volume and has flooded the gardens south of Blind Lane in Southwick. This has happened on three occasions since 2012 which shows that the flood zone models used for these flood calculations are out of date. The Lambrok Stream on the site runs in three directions and the site is on a well-known floodplain. Flooding has been frequently witnessed in these fields and within some of the housing surrounding them, especially during autumn winter and spring. Application 13/02007/OUT being a property on the corner of Blind Lane/Wynsome Street was recently refused planning permission by Wiltshire Council, due to the level of existing flooding in the area. The campaign group also state that if development proceeds despite the concerns of local people the developers and/or existing landowners should be required to set aside funds in order to compensate future flood victims in the neighbourhood.

The River Levels independent website www.riverlevels.uk/floodwarning has identified land alongside the full length of Lambrok Stream from Acacia Road in the centre of Trowbridge all along the line of its flow to Southwick Village for flood alerts and warnings.

Whilst the Church Lane proposed development area currently comprises green fields, rough grasslands and paddocks the land acts like a sponge in the wet winter months absorbing rainfall over the whole area of the site and sending much of it down to the water table below, with a lesser volume of water flowing into the Lambrok Stream. This means surface water run-off is reduced and flooding in the area is less than it would otherwise be.

However, if the proposed development site were to be approved it would lead to the area being covered by highway tarmac, pavement and houses. Instead of rainfall soaking into the land the incidence of 'run-off' of water would increase significantly causing excessive and concentrated rainflow into the Lambrok Stream. This would severely threaten the new homes, as well as existing nearby properties and the adjacent Southwick Country Park with surface water flooding.

Furthermore, the consequentially raised water table in the area of the new and existing properties could also undermine their physical structure and increase the risk of heave and subsidence. It is common knowledge that clay soils that are repeatedly waterlogged in wet winter months and then dried in dry summers will expand, shrink and crack greatly. The Environment Agency website www.gov.uk/check-flood-risk identifies the land 100-200m all along either side of this section of the Lambrok Stream to be at HIGH RISK of flooding (27th June 2017).

The Environment Agency's concerns about increased levels of irresponsible building development in floodplain areas in the UK in recent years are well-known. The lower section of the earmarked field at Church Lane is classified as floodplain, and it seems foolish to consider it for development when it is bordered by a stream and known for local flooding and waterlogging, whilst many other potential development sites have been identified in Wiltshire, as well as a number of available large 'Brownfield' sites, which do not have the same proximity to streams and rivers with the associated flood risks.

The Government's Planning Portal Planning Policy Statement 15: Planning and Flood Risk Annex B: Development and Flood Risk says:

B11 New development can increase indirect flood risk in locations beyond the development site simply by increasing the amount of run-off from the developed area. This may occur where permeable surface areas are reduced by construction work leading to increases in the volume and speed of water transported through a catchment.

B12 Where development, for example, a poorly located bridge across a river, restricts the capacity of the drainage system to convey water through an area, this will increase the flood risk adjacent to and upstream of that development. This will create the potential for flooding to occur more often and to greater depths. Development that impairs the conveying capacity of the flood plain can also exacerbate risk by encouraging the gathering of water borne debris that may further restrict floodwater flows.

B13 Buildings and the construction of other hard surfaces also have the potential to increase downstream flood risk by decreasing flood plain storage and increasing the scale or speed of run-off.

So, development at Church Lane, in addition to exacerbating flooding and the other identified risks at this site, could also increase flooding issues anywhere along the line of the Lambrok Stream which ribbons its way across Trowbridge, through Wingfield, North Bradley, Southwick and beyond. If development causes additional water flow or blockage or obstruction at any point along the stream this could impact upon properties near to the stream anywhere along its line. Development anywhere along the line of the stream should therefore be investigated very thoroughly to assess the potential detrimental flooding consequences all the way along the line of the stream.

	<p>The Environment Agency's website under the Flood Map for Planning tool has been interrogated (28th June 2017). It shows that the lower end of the proposed development site registers as a category flood zone 2 or 3 which requires the developer to carry out a Comprehensive Flood Risk Assessment.</p> <p>The outline planning application that Trowbridge Town Council was consulted on identifies the Church Lane site as the whole field right down to the Lambrok Stream. This area includes the floodplain zone 2/3 section of the field. The Trowbridge Town Clerk advises, however, that when the planning application progresses he expects the developer only to include the upper two-thirds of the field, the section above the floodplain (flood zone 1) which does not normally require any flood risk assessment. However, given that any run-off of water from the development would pass straight into the flood zone 2/3 area and into the Lambrok Stream with all the associated risks outlined above to the immediate neighbourhood as well as elsewhere up and downstream I believe the development should still be disallowed on flooding grounds.</p> <p>I once worked in a large city council Engineering Department. One of our fully qualified engineers told me his house was built on clay and that he spent his summer evenings not spraying the plants in his garden but instead he sprayed the foundations of his house to prevent the clay beneath drying out to try to reduce the risk of subsidence. Wiltshire Council should take heed – it would be far better to build houses on a level and stable site, preferably a tried and tested Brownfield one than to build on a virgin Greenfield slope of clay, on a gradient and alongside a stream that has a history of flooding and ground saturation every winter. The costs of flooding and/or subsidence are always high.</p> <p>Local hearsay...one of our neighbours has said she was recently walking in the area in question when she stumbled upon a Wiltshire Council officer and asked him if the Council was planning to develop the land. He apparently answered on the lines of, 'Not a chance. We wouldn't build on floodplain'.</p> <p>And now...here we go.</p> <p>Wiltshire Council - 'where everybody matters'</p> <p>Let's hope the views and wishes of the people of the Church Lane area matter.</p> <p>P.S. Another representative of the developers was seen making bore holes in the adjacent fields Sites 3260 and 3265 during August 2017, apparently to check the level of the water table. If this is the only time these inspections have been carried out (i.e. in August after one or two of the driest months of the year) then it is particularly foolish.</p> <p>If development is allowed to take place at Site 1021 Church Lane or the other nearby sites those unfortunate new residents will not have the luxury of only living in their houses in the summer months. They will have to live here all year round. That said, I suppose they may only be able to live there in summer if their properties flood every winter, and they may well have to pay colossal annual home insurance premiums for the 'pleasure' of living on a flood plain.</p> <p>Residents who have lived in the Church Lane vicinity for much longer than me report that flooding in the area is a frequent occurrence. The following photographs evidence this:</p>
<p>Attached files (Please see Objective)</p>	<p>4712512</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1135	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>OBJECTION re: Accessibility/Highways considerations Church Lane Site 1021 - Draft Wiltshire Housing Site Allocations Plan</p> <p>Highways issues/Accessibility</p> <p>The A361 is a blackspot for accidents both “in the dip” where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. There have been a number of serious road traffic accidents and one dead deer on the A361 in the last 6 months in the vicinity of the Church Lane and Oldbrick Road junctions (local Police will have full details).</p> <p>I witnessed one of those ‘boy racers’ in a silver car accelerate from around the junction of The Poplars southwards down the A361 at dusk on the evening of Thursday 7th September 2017 at a colossal speed. I am not exaggerating with an estimation of 60-70mph. Notwithstanding the failing light, reading the number plate at that speed was quite out of the question.</p> <p>Further access points onto the A361, even with tightened speed restrictions would only make matters worse. The Country Park is also used for regular ‘park runs’ where running and parking along the A361 between Southwick and Trowbridge is a common cause of delays.</p> <p>In contrast, the West Ashton site, for which the planning is well progressed, already has a new road, one new school and plans for two others. Sites at Church lane, Boundary Walk and Old Brickfields are being considered as Wiltshire Council states they would reduce traffic as residents would walk into Trowbridge rather than using their own vehicles (as opposed to development in nearby villages where cars would need to be used).</p> <p>PFA Consulting report for Wiltshire Council Trowbridge Traffic Model 2026 Model Forecasting ‘Problems and Issues’ Dated 30th June 2011</p> <p>This report was commissioned by Wiltshire Council to advise on impacts on traffic and highways of the development proposals in its Core Strategy for 2006-2026. The report was written in the context of a planned 6,000 new homes in Trowbridge during this 20-year period.</p> <p>Para 2.6 required that 40% of the new homes should be affordable. Will they be?</p> <p>Para 2.7 stated that there would need to be improved public transport, pedestrian and cycling linkages to the town centre. What improvements in this regard are to be made affecting sustainable commuting from the proposed Church Lane, Southwick Court, and Upper Studley developments?</p> <p>Para 5.1 says TEMPRO guidance advises where development proposal is likely to have significant impact it should be explicitly modelled. Has such modelling been carried out for proposed development sites 1021, 3260 and 3265?</p> <p>Para 7.8 says average journey times were estimated to rise by 30-40% between the base year 2009 and 2026. It also states that this is unacceptable.</p>				

Para 8.4 The Conclusions section of the report states:

The traffic modelling has demonstrated that the performance of the highway network would suffer from increased levels of congestion with the planned future developments in Trowbridge resulting in the following:

- Reduced reliability for both motorists and bus passengers (given that public transport has no priority over cars);
- Increased journey times and journey distances;
- Reduced traffic speeds;
- Increased car borne pollution (since this report was compiled the Government has in 2017 reluctantly released the damning findings of its plan to tackle air pollution, much of it from motor vehicles, which is now quoted as causing up to 40,000 premature deaths p.a. in the UK).

Para 8.5. Further conclusions state that increased traffic volumes and congestion will likely result in:

increased noise;

increased visual intrusion;

discouragement of walking and cycling as modes of travel;

It will also reduce the economic viability and attractiveness of Trowbridge as a place in which to live, work or visit.

Traffic and travel survey A361 in the vicinity of Church Lane

The number of vehicles on the UK's roads rises daily, leading to more road traffic accidents, ever greater levels of congestion and vehicle emission pollution, and more directly attributed illnesses and deaths due to this pollution. Outdoor air pollution is contributing to about 40,000 early deaths a year in the UK, say the Royal Colleges of Physicians and of Paediatrics and Child Health – February 2016.

Vehicle pollution and adverse effects on health are greatest where there are the highest densities of heavy slow-moving traffic in built-up residential areas. Therefore planning more housing developments which will bring more motorised traffic into areas which are already suffering from traffic congestion and pollution are irresponsible, and those people deciding on those developments will be responsible for the increased respiratory illness and deaths caused as a consequence.

I have carried out a traffic survey of residents living very close to the proposed Church Lane Site 1021, Upper Studley Site 3260, and Southwick Court Site 3565 during August 2017 to try to gauge the local impact of developing some 250 houses on these 3 sites all feeding traffic onto the A361.

The scope of the travel survey were residents living in Church Lane, Church Fields, The Nestings, Oldbrick Fields, The Poplars, Spring Meadows, and Frome Road (from the Nestings to the junction of Silver Street Lane) – i.e. existing homes nearest to the proposed development site 1021 Church Lane.

Purpose of the survey –

INDICATOR 1: to get an indication of the extent to which building some 250 new houses on the green buffer zone off the A361 (sites 1021, 3260, 3565) would regenerate Trowbridge Town centre.

(Ref: Atkins Sustainability Appraisal Report June 2017 page 158 - A marginal increase in population will help support and bolster the town as a principal settlement and thereby increase opportunities for inward investment.)

INDICATOR 2: to get an indication of the extent to which residents of these 3 proposed housing development sites would use sustainable transportation modes (walk/cycle/bus) to go into Trowbridge town centre.

(Ref: Atkins Sustainability Appraisal Report June 2017 page 147 – Improve air quality; it is recognised..that the development is within 2km of key facilities in Trowbridge which are therefore accessible by foot, cycle and buses. This could limit the extent of additional traffic using the A361 to access the town.)

Survey results –

62 people completed the travel survey.

INDICATOR 1: Town Centre regeneration.

20 respondents said they use the town centre facilities less than 5 times per month.

The average number of visits per month to the town centre by the remaining 42 survey respondents (68% of the total) was 12.5.

This indicates a relatively low usage of Trowbridge town centre facilities including its shops, restaurants, and entertainment facilities by residents of this outer fringe of the town. Indeed, a significant number of these visits to the town are by people who work there or attend school, rather than people visiting the town to spend money in the shops or other establishments.

If more new homes were instead built on vacant brown field sites in the centre of Trowbridge the new residents there would be truly within easy walking distance of the town centre facilities. Residents there would be likely to bring much greater demand for town centre services and facilities and to generate more trade for town centre businesses.

INDICATOR 2: Increased incidence of sustainable commuting to the town centre – i.e. walk/cycle/bus.

Of the 58 respondents who said they go into the town centre the mode of transport they mostly used was:

Mode	Number of people	%
Walk	9	15
Cycle	3	5
Bus	1	2
Private car/motorbike	44	76
Taxi	1	2
Other	0	0
Totals	58	100

Conclusions from the local travel survey:

There is no evidence to support the contention that building houses on the outer green fringes of the town will have any significant regeneration effect on Trowbridge town centre businesses.

There is no evidence to support the contention that either existing or new residents in the vicinity of Church Lane will use sustainable modes of transport to reach the town centre.

Conversely, it is highly likely that people living in the proposed 250 new houses, spilling perhaps 500 additional motor vehicles every day onto the A361 will have a significant effect on local road congestion, air pollution, and would increase the likelihood for increased road traffic accidents. Many of these motor vehicles would head into the town centre congestion even though a large number of them may be passing through towards other towns, M4 etc and therefore spending no time or money in Trowbridge town centre itself.

Conservative extrapolation of the impact on Trowbridge of 250 new houses, with an average of 2 cars per household, where 68% of those cars go into town along the A361, on an average of 12.5 occasions per month, and then come home again, x 12 months of the year, would mean... 102,000 extra car journeys into Trowbridge town centre p.a. causing additional road accidents, air pollution and traffic congestion.

Other points

It is difficult to justify any development at the present time that leads to greater density of traffic on already built-up and congested town and city roads given the issues of congestion, commuter delay and its impact on British industry, and traffic pollution induced ill-health. Electric cars are touted as the way forward to replace the most polluting diesel and petrol vehicles, but the technology for producing cost-viable electric cars and the charging technology and infrastructure is as yet years away.

Britain's highways are in chronic disrepair and in no shape to handle the volumes of traffic coming their way. An article in The Times on 1st August reported, 'A report by the Asphalt Industry Alliance earlier this year found that local roads had a £12 billion backlog of repairs that would take a decade to clear at present rates.'

The main traffic artery into Trowbridge the A361 is a classic example of this. The route was clearly established long before the invention of motor vehicles being narrow, having many bends, some of them very sharp as well as some fairly steep gradients in places. As you get nearer to the

town centre (from Manor Road onwards) it is apparent the rows of terraced houses were built before people owned motor cars as there are no driveways and vehicles are parked in a continuous line along one side of Frome Road, making the route even narrower. Frome Road (A361) has a continuous convoy of motor vehicles travelling along it all day long. Long queues of stationary idling vehicles build up during the morning and evening 'rush-hours'. During the daytime when these vehicles are actually moving many of them travel too fast given the pedestrians, the many side roads, the bends in the road, junctions, the poor visibility due to all the parked vehicles, and the gradients. There are also a huge number of very large lorries and buses on this route that find it a challenge to navigate the route into town.

The Atkins report Wiltshire Housing Site Allocations Plan Sustainability Appraisal Report Annex 1 A.9 Trowbridge Principal Settlement June 2017 at Page 147 under the Church Lane site 1021 section says of development at Church Lane: 'It is recognised, however, that the development is within 2km of key facilities in Trowbridge which are therefore accessible by foot, cycle and buses. This could limit the extent of additional traffic using the A361 to access the town'.

This is a fantasyland statement. The A361 is the only direct route into town from here. As proved by the results of my recent traffic survey few people are prepared to walk into town from here. Who would want to walk 2km immediately alongside the continuous din of the 'A' road, breathing in deadly vehicle emissions, and risking a drenching from vehicles charging through puddles in the road on a wet day? Any health benefit derived from the exercise would be negated by the harmful effect of the noxious poisons emitting from the passing vehicles. Still less likely are ordinary people to choose to cycle to town, and it would be an absolute 'no-no' to allow children to risk cycling. I am an experienced cyclist and I can assure you that this must be one of the most dangerous cycle routes that I have ever experienced. The risks include:

- Many side roads and vehicles entering the A361;
- Cross-roads and mini-roundabouts;
- Pedestrians crossing the A361, which as well as being an 'A' road is also a residential street;
- Narrow pavements, pedestrians, and cats and dogs (and deer) sometimes step onto the carriageway without looking first;
- Narrow carriageway with numerous bends and some considerable gradients in places;
- Many parked cars. These hamper visibility of pedestrians and of vehicles emerging from side streets. Parked cars provide a further specific hazard for cyclists. Drivers and passengers frequently emerge suddenly from them, opening car doors into the traffic without looking. Many cyclists are injured in the UK when car doors are opened into them. As an experienced cyclist I know to give parked cars a wide berth, but this causes other issues.

Given the nature of the A361 the route is simply not adequate for the many large lorries and buses that attempt to use it. If the drivers of these large vehicles are responsible they have to drive slowly, frequently having to stop to give way to oncoming traffic at particular pinch-points in the road. I, and the numerous other keen and experienced cyclists will continue to use this route into town. I almost invariably end up with a convoy of large articulated lorries following behind me as I approach town on the A361. The road is not wide enough for them to pass me, so they have to follow at whatever speed I am cycling. Taking planning decisions that lead to more motor vehicles on this route and adding to the congestion and air pollution would be pure folly.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1136	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Alternative sites to Church Lane and Upper Studley 1. Review of Atkins “Wiltshire Housing Site Allocations Plan” Atkins were employed to review the six key sites identified by Wiltshire council for housing: Elizabeth Way – 205 houses White Horse Business Park – 150 houses (67% negative impact vs 33%positive) Elm Grove Farm – 200 houses Church Lane – 45 houses (83% negative impact to 17% positive) Upper Studley – 20 houses (80 % negative impact vs 20% positive) Southwick Court – 180 houses (71% negative impact vs 29% positive) Each site was assessed against the following headings Bio-diversity, Water, Historic Environment, Landscape, Accessibility, Education and Housing/ Employment provision. They were given a rating against each objectives (negative impact or positive impact.) The land at Church Lane was deemed the least appropriate site of all six. In addition, the sites at Elizabeth Way, White Horse Business Park and Elm Grove farm provide infill between existing developed sites whereas the other three site would impinge on open countryside. In fact, the recent planning application for 100 plus houses off Blind lane was refused on the basis that it provided “an unwarranted encroachment of the open countryside”. This is also the case at the Church Lane, Boundary Walk and Old Brick fields sites. This was rejected based on paragraph 17 of the National Planning Framework: Core planning principles 17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should: <ul style="list-style-type: none"> ● be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency; ● not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives; ● proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as 			

land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;

- always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;
 - take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;
 - support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy);
- contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;
- encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;
- promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
 - conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;
 - actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and
 - take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

The Church Lane (1021) and Upper Studley (3260) proposed sites in Trowbridge form the outer boundary of the town and lead into beautiful, unspoilt countryside which forms the buffer between Trowbridge and Southwick. Provision of new housing in Trowbridge should make use of sites which do not extend into open countryside before rural sites are considered. This paper will put forward other sites within the current settlement boundary which would provide the same housing capacity whilst maintaining the Wiltshire Countryside.

The Church lane and Upper Studley sites offer 6ha of developable land. Wiltshire Council could easily offer this land using a variety of sites which are within the town. The following sites should be used before encroaching on our countryside:

Site 645,646 and 647 – Land to the rear of Trowbridge Road (over 2 ha)

Whilst this land is currently agricultural, it provides an infill between two residential areas and should therefore be used before open countryside.

Site 1018 – District Council Offices (2.46ha)

Seen as windfall by the council but should be offset against open countryside.

Site 198 – Land and Buildings (0.33ha)

Site 200 – Trowbridge Garden Centre (1.33ha)

This land is ripe for development and again provides infill between residential areas

Site 247 – The Stables (0.7ha)

Site 248 - Drynam Lane (1.68 ha not yet accounted for)

This site is ideal for development as it would complement development which is already planned for this part of town

These sites alone would provide 8.5ha of land for development which would mean that none of the open land between Southwick and Trowbridge need be touched. All of these sites could be developed within the next 10 years. In addition to this there is:

Site 613 – Land off the A363 White Horse Business Park to...(5.7ha)

Although agricultural land, this site provides infill between existing development as opposed to open countryside.

In addition to these sites other sites were dismissed as part of the SHLAA, the reason given for this was that they were within the current settlement boundary. The National Planning Policy states, “planning policies and decisions should encourage the effective use of land by re-using land.” It appears that Wiltshire Council have decided that developing infill sites would be less attractive to developers and have therefore chosen open sites which do not need to be built on to fulfil their housing quota. Surely Wiltshire Council should not opt for the easy, developer led option to the detriment of our countryside, wellbeing and wildlife.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1137	Consultee Mr Michael Steedman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125794		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site No.s H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	CONTRARY TO HOUSING DELIVERY STRATEGY • The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”. • Para 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1138	Consultee Mr Michael Steedman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125794	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site No.s H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE • Para 5.128 of the Draft Allocation Plan says: “The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS”. This is simply not true. • The “Salisbury Transport Strategy” (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed. • Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: • “Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy.” • It should also be noted that such “Salisbury Transport Strategy” as exists is not detailed and has never been subject to public consultation or formal adoption. • Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end. • We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague “solutions” should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through. • There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess. • We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all. • Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1139	Consultee Mr Michael Steedman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125794	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site No.s H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	FLOOD & SEWAGE IMPACT • Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites. • Site S1027 is well known locally for having standing water regularly during the winter. • There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1140	Consultee Mr Michael Steedman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125794	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site No.s H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	NOISE • A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1141	Consultee Mr Michael Steedman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125794	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site No.s H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLAWED PROCESS • We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process. • The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed. • The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan. • The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.</p>				

Comment ID:	1142	Consultee Mr Michael Steedman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125794	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site No.s H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	VISUAL AMENITY / HERITAGE LANDSCAPE • The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1143	Consultee Mrs Clare Clifford Person ID: 1126359	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H3.1, H.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is no infrastructure to support this number of additional houses in Harnham. The current road system is already at capacity and ceases to function when there is any disruption (eg. the recent New Bridge road repairs caused huge disruption. Adding at least 1000 extra cars would cause gridlock and make it impossible to join the Harnham Road from the various residential roads along it. The gyratory, again already at capacity, would add to an already very difficult traffic situation. There is a similar issue going west to Wilton, where the queues along Parkwall, particularly at peak times, are very long. Residents wishing to shop all travel along the Netherhampton/Harnham Road as all the major shops and access to the city are on the east side of Salisbury, meaning more cars and more delays. As the site is located along way from town, is not well served by bus routes, this will further add to traffic congestion. Look long and hard at the traffic implications before going any further. The likely disruption to the whole of the city needs to be considered, thought through and tested before any building is started. Make sure that all the infrastructure is considered and put in place, again before any building is started.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1144	Consultee Mr and Mrs Gillian and Terence Bliss	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 897565	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Regarding the building of 600 homes in the 'greenfields' around Hilperton and Trowbridge. If this is approved the identity of Hilperton will be destroyed, this would include the Trowbridge fringe.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1145	Consultee Mr and Mrs Gillian and Terence Bliss	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 897565	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We cannot understand why this should happen to this area as there are sufficient building sites in the centre of this county town which include the former Bowyers site and existing Ashton Park development.</p> <p>We implore you not to destroy our green spaces to satisfy developers.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1146	Consultee Cllr Stephen Berry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126511		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The proposed sites along the Netherhampton Road are described as being within the settlement area of Salisbury but are actually outside the Salisbury Community area, and in Netherhampton Parish. As coherent Community Areas are key principles of the Wiltshire Core Strategy. I believe that the Housing Site Allocation Plan cannot therefore be sound.</p> <p>The proposed sites for 640 dwellings and 100 dwellings along Netherhampton Road represent a vastly disproportionate increase in this small village of currently some 60 homes.</p> <p>It must be shown that there is a transport infrastructure solution capable of implementation which does not involve the a3094. THIS WILL HAVE TO BE RADICAL.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1147	Consultee Mrs Josephine Snow	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126943	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to strongly object to the planning application to build 740 homes and a school along the Netherhampton Road for the following reasons</p> <p>The total lack of infrastructure in the area, the roads could not cope with more traffic, they can't cope now.</p> <p>Public Transport links are totally absent i.e. busses into Salisbury.</p> <p>The gyratory is operating at %70 of capacity, if there is an accident the whole area grinds to a halt and the emergency services have great difficulty doing their job efficiently.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1148	Consultee Mrs Josephine Snow	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126943	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Green field sites should not be built on unless all other options have been looked at.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1149	Consultee Mrs Josephine Snow	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126943	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The smaller proposed site for 100 houses is on flood plain.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1150	Consultee Richard and Christine Henderson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126946	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		840 homes proposed at Harnham, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing with our objections to the proposed building of houses and a school on the Netherhampton Road site. It would appear the plans to build the houses does not include improving the infrastructure, we have roads all around Harnham that are incapable of taking any more traffic. I regularly find myself in queues whichever way I try to drive whether it be towards Wilton or towards Salisbury.</p> <p>I have lived in Harnham many years and have seen the fields on which the building is to take place flooded for large parts of the winter and spring months. Already there is too much traffic through Harnham and I understand that the Britford Meadows plans were rejected as it was felt that the roads were unable to take the increase in traffic that would ensue. I would be interested in how the same roads would now be able to take an increase in traffic for the Netherhampton Build?</p> <p>Not only would the 840 houses and school mean the roads would be busier after they would be built but the lorries carrying the material to build these houses would have a significant impact on the roads.</p> <p>I would like our objections to be noted.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1151	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Pagnell Lane 1. Minor changes are proposed with no apparent justification or consequence. However, the boundary should be extended to include the house and outbuildings of 12 Pagnall Lane which comprise a "built...residential...facility". The surrounding garden area, extending at its northern end along a clearly defined hedge opposite number 13 Pagnell Lane, should also be included as "the curtilage of a property that relates more closely to the built environment (e.g. a garden)...". The space immediately to the north side of this hedge, however, is an agricultural field and should therefore be excluded in accordance with the stated criteria that it "relates more closely to open countryside (e.g. a field or paddock) and has the capacity to substantially extend the built form of the settlement in terms of scale and location". Boundary should include the house, any outbuildings and the specified garden of 12 Pagnall Lane. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712373				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1152	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	2. 11 & 13 Russell Mill Lane Inclusion of these properties is logical and acceptable. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.				
Attached files (Please see Objective)	4712407				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1153	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3. 8 Russell Mill Lane Inclusion of this property is logical and acceptable. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712410				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1154	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land behind 109 High Street, LP</p> <p>4. Exclusion of this space appears to be on the basis that it is "The extended curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock)". In fact it is, for the most part, the rustic garden of 109 High Street. It is within the line of the original burgage plots and is not visibly part of the countryside or agricultural in any way.</p> <p>A small section forms the garden of 115 High Street. It should not be excluded and the settlement boundary should remain unchanged.</p> <p>It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712411				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1155	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5. Land beyond 24 Eastfield 5. The triangle of land forms part of the garden of 24 Eastfield and should not be excluded. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712413				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1156	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>6. Sandfield, Newby Close and Village Hall 6 Minor changes with no apparent justification or consequence. It would be logical to include the Playing Field within the settlement boundary in accordance with the methodology. It is "Recreational or amenity space that relates more closely to the built environment". The playing field is bounded on the north by housing on Sandfield and Newby Close, on the east by the primary school, on the west by the village hall and on the south, in part, by Hedges House bungalows. The primary school and pre-school should also be included on the basis that each comprises "development such as ... schools ... that is physically related to the settlement". They are obviously not related to anything else and do not in themselves "have the capacity to substantially extend the built form of the settlement" Boundary should include the playing field, DAPS and the preschool. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712416				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1157	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Area behind Hooks Court, 65 – 69 High Street WL and The Manor The buildings and space immediately behind Hooks Court can be described as farm buildings and farm yard and can thus be excluded in accordance with the stated criteria. However, the area behind 67-69 High Street is a private garden, private garage and out buildings and should not be excluded on the basis that it forms "the curtilage of a property that relates more closely to the built environment (e.g. a garden) ..." The Manor and the Manor yard should be included as they are clearly "a built residence ... that is physically related to the settlement." Its proposed exclusion is bizarre. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712417				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1158	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Strip behind 44 – 56 High Street, WL Minor change that corrects boundary line along footpath. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.				
Attached files (Please see Objective)	4712418				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1159	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Dauntsey's School Extension of the boundary to include Evans House is correct. The boundary should also be extended to include the new Pavilion (indicated by the arrow) as it is a "built development ... that is physically related to the settlement". Indeed, the entire perimeter of Dauntsey's School grounds should be included on the basis that the area comprises "development such as ... schools ... that is physically related to the settlement". The grounds are also "recreational or amenity space at the edge of the settlement". The school grounds are obviously not related to anything else and do not in themselves "have the capacity to substantially extend the built form of the settlement" except regarding school use. Any development of the school is not a development of the settlement! It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712428				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1160	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Dauntsey's School car park Minor change of no consequence, but see response to 9. above. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712430				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1161	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Houses at The Farm, LP A correct inclusion of the new houses. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.</p>				
Attached files (Please see Objective)	4712433				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1162	Consultee Kaye Elston Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Lavington Parish Council Person ID: 1126948		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Area adjacent to High Street, LP Minor changes with no apparent justification or consequence. It should be noted that the parish of West Lavington is advanced in the preparation of a Neighbourhood Plan. Options for new housing sites were the subject of extensive public consultation on a first draft of the Plan in 2015/16 and, as a result, final draft proposals are being prepared which will recommend one site for development preferred by 68% of respondents of 40 to 60 dwellings on the edge of the village, close to shop and pub facilities and adjacent to the primary school, recreation and play grounds, village hall and youth club. It is intended that submission of the Plan proposals to Wiltshire Council will be in January 2018 with inspection and referendum following within 12 months. Then (in accordance with Wiltshire Core Strategy which supports the review of settlement boundaries through neighbourhood plans) the parish's settlement boundary can again be reviewed with a view to achieving boundary consistency in line with the results of the Neighbourhood Plan as emerging for adoption.				
Attached files (Please see Objective)	4712435				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1163	Consultee Mr N Bennett	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 901946	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site: Land at 100 Frome Road, Southwick (SHLAA Ref: 3341)</p> <p>Policy H2: we consider that the draft Plan should be making provision for additional housing growth in the Trowbridge Community Area on the following basis:</p> <p>The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026. There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative deliverable sites in the Trowbridge Community Area. There is an unmet affordable housing need in Southwick which can only be addressed by the provision of new housing to subsidise the provision of new affordable housing.</p> <p>There is no Neighbourhood Plan being prepared for Southwick.</p> <p>The Housing White Paper (February 2017) seeks to diversify the supply of new housing in response to the dominance of the national / PLC volume home builders. The subject site is of a size that is suitable for development by a local / regional housebuilder.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in the Trowbridge Community Area, that the subject site should be included as an allocation for circa 20-25 homes in the draft Plan.</p> <p>Promotion History:</p> <p>The subject site of approximately 1.0ha comprises part residential curtilage and part agricultural land. Access is available from the A361 via Hoggington Lane and there are no physical constraints.</p> <p>The site is well contained in landscape terms with defensible boundaries on all sides, and has potential to accommodate circa 20-25 houses in the form of mixed tenure scheme of open market and affordable homes.</p> <p>Statement of Common Ground: the landowner confirms his willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that the landowner would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: Wiltshire Council to allocate the subject site for circa 20-25 dwelling units as outlined in enclosed Title Plan (SHLAA Ref: 3341).</p>				
Attached files (Please see Objective)	4714685				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To make the planning case for the subject 'omission' site (SHLAA Ref: 3341) to be included as an allocation in the draft Plan.				

Comment ID:	1164	Consultee Mr Michael Gill	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126801	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Rd., Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The effect of building 840 houses on the Netherhampton Rd, Salisbury, would make the already heavy traffic on that road unmanageable. Detailed plans and road building to address potential traffic overcrowding on the route into Salisbury.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1165	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.62-4.72		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In South Wiltshire , Salisbury has been selected as the main focus for housing development yet the pattern of employment in the area is more dispersed. Proposed housing sites and settlement boundaries need to reflect this in order to reduce the need to travel , particularly commuting out to more rural sites.</p> <p>The proposed large greenfield site at Netherhampton Road (3.1) is not in Salisbury but within the rural parish of Netherhampton which lacks facilities. It would therefore appear to contravene the objectives of the spatial strategy and the key challenges of the Wiltshire Core Strategy. The allocations have not been demonstrated to be achievable in the absence of detailed highway and drainage proposals. The plan should demonstrate on a site by site basis how the key challenges of the Wiltshire Core Strategy have been met. The plan seeks to concentrate development in the principal settlements but in the Salisbury area, employment patterns are more dispersed. (these range from large employers such as Porton Down to the numerous conversions of farm buildings to business purposes) Also modern lifestyles with an increase in remote working and internet shopping reduces the need for development to be concentrated in large sites on the edge of towns. A more dispersed pattern allowing more development in villages would have less landscape impact and make better use of existing resources. The configuration of Salisbury as a convergence of routes at the confluence of several rivers and enclosed by hills makes any expansion of the settlement difficult without significant impacts in terms of landscape setting and heritage , traffic congestion and reduction in air quality , flood risk and drainage . A more thorough appraisal of existing infrastructure should be undertaken and a detailed updated transport strategy should be published before greenfield sites with no existing infrastructure are allocated . The existence of a ring of park and ride sites lends itself to satellite development leaving green space around the city.</p> <p>The proposed sites at Netherhampton Road are fundamentally in the wrong place. They could only be justified if they delivered the Harnham Relief Road/Brunel Link. I was given to understand at the Guildhall consultation meeting that this is no longer in the transport strategy. These proposed greenfield sites do not tie in with the best use of existing infrastructure and facilities and are in a location away from health, leisure and education facilities with no public transport available to provide access to such facilities.</p> <p>This would appear not to meet the key challenges of the Wiltshire Core Strategy.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To challenge the assumptions that have been made in relation to the Netherhampton Road sites in light of their current lack of infrastructure and a lack of detailed proposals to mitigate identified adverse impacts.				

Comment ID:	1167	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Appendix E [of the Westbury Community Area Topic Paper] is incorrect, recording Bratton as having 819 dwellings. The 2011 Census identified 512 households, with 1248 residents, meaning the proportionate growth by an additional 40 houses is incorrect and grossly understated. Be accurate. The Plan is unsound in its material facts.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1168	Consultee Georgina A'Bear Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Seend Parish Neighbourhood Plan Steering Group Person ID: 1126956		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A40 Seend settlement boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Seend Parish Neighbourhood Plan Steering Group would like it recorded that we were not asked by Wilts. C.C. if we were allocating housing or reviewing the Settlement Boundary. On page 4 of the Melksham Community Area Topic Paper - Cabinet Version it states these 2 points as UNKNOWN.</p> <p>The S.P.N.P.S.G. would like to inform the Spatial Planning team that we are planning to allocate housing as a result particularly of the Rural Housing Needs Survey that was undertaken last year by Wiltshire C.C. There appears to be no reference to this data gathered by yourselves in any of the documentation of the consultation.</p> <p>We do plan to review the Settlement Boundary when we get to that stage as stated in our V.O.P's.</p> <p>We would also like to inform you that that we have produced and consulted the community on our draft Visions, Objectives and Policies for our Neighbourhood Plan which we feel is a significant step in showing the concerns and aspirations of the Parish.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1169	Consultee Mr Giles Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.9		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The LPA should identify the best and most sustainable sites for housing and development to occur taking account of all constraint and then approach the land owner via a land registry search. Just because a landowner is 'plugged' into the planning system does not mean it is the most sustainable site. Just because a landowner is not up to date with the planning system does not mean if approached he or she would not promote their land. It may be the complexity of the system that puts landowners off. I believe this to be a flaw in your site allocation methodology and therefore the plan is not legally compliant.</p> <p>The LPA should start the methodology again by identifying which sites are the most sustainable and then approach landowners if the land has not already been promoted to the council. Without this happening the plan cannot be legally compliant or sound.</p> <p>The LPA should start the methodology again by identifying which sites are the most sustainable and then approach landowners if the land has not already been promoted to the council. Without this happening the plan cannot be legally compliant or sound. The method is therefore not positively prepared, justified or effective and therefore not consistent with national policy.</p> <p>The LPA should start the methodology again by identifying which sites are the most sustainable and then approach landowners if the land has not already been promoted to the council. Without this happening the plan cannot be legally compliant or sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1170	Consultee Mrs Mary Tapping	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126945		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Too many too itemise		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As just one example, the Council has failed to register its ownership and financial interest in a plot of land behind the junctions of Victoria Road and Wyke Road. This is agricultural land from which the Council might expect to receive a financial windfall by selling it to a developer - who would require "change of use" planning approval in order to build there.</p> <p>Wiltshire Council stands to make a financial killing by permitting its use for development and this should (legally) have been made clear on the Plan. Clearly, these financial advantages would provide considerable incentive for the local authority to grant planning permission for that area to be re-classified as residential.</p> <p>This should be clear from the context above.</p> <p>In order to make the draft Wiltshire Housing Site Allocations Plan sound, it needs to be totally scrapped and completely re-written from scratch - this time committing more care and intellectual vigour to its construction!</p> <p>Plenty - but I'll keep them for later!. I am disappointed that a project of such importance should take so long to produce with ultimately unworkable proposals.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I do not necessarily wish to speak but I am keen to observe the discussions at first hand.				

Comment ID:	1171	Consultee Mrs Sandra Freeman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447787		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We write regarding the draft housing site allocations in Salisbury at the above areas. We live in the Harnham area of Salisbury and until moving to our present address in East Harnham, lived on the Netherhampton Road for 15 years.</p> <p>During that time we saw probably a ten-fold increase in the amount of traffic (both local and through traffic) causing long delays at the A36 junction and the Harnham gyratory making it difficult to exit our drive onto the main road, hence our move to another part of Harnham. This situation has necessarily worsened over the years due to the huge increase in traffic generally through and around Salisbury.</p> <p>The proposed development of 740 houses on the Netherhampton Road will bring gridlock and misery onto this road and the Harnham Road. Most houses now have at least one car and there could therefore be an extra 1000 plus vehicles using these roads. Traffic is currently damming back from the Harnham gyratory in the mornings to the turning to Upper Street thus confirming that the road network cannot feasibly take more traffic. The Harnham gyratory is almost on permanent gridlock, taking not only local traffic but commercial traffic from the A3094, A338, A354 and A30.</p> <p>Until the Salisbury road network has undergone a complete and thorough overhaul, it is our opinion that the proposal to construct this quantity and density of housing in this particular location would be nigh-on catastrophic for the free flow of traffic on Salisbury's arterial and local roads, which are already at bursting point, and we trust that our views will be given appropriate discussion and consideration.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1172	Consultee Mrs Sandra Freeman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447787		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We write regarding the draft housing site allocations in Salisbury at the above areas. We live in the Harnham area of Salisbury and until moving to our present address in East Harnham, lived on the Netherhampton Road for 15 years.</p> <p>During that time we saw probably a ten-fold increase in the amount of traffic (both local and through traffic) causing long delays at the A36 junction and the Harnham gyratory making it difficult to exit our drive onto the main road, hence our move to another part of Harnham. This situation has necessarily worsened over the years due to the huge increase in traffic generally through and around Salisbury.</p> <p>The proposed development of 740 houses on the Netherhampton Road will bring gridlock and misery onto this road and the Harnham Road. Most houses now have at least one car and there could therefore be an extra 1000 plus vehicles using these roads. Traffic is currently damming back from the Harnham gyratory in the mornings to the turning to Upper Street thus confirming that the road network cannot feasibly take more traffic. The Harnham gyratory is almost on permanent gridlock, taking not only local traffic but commercial traffic from the A3094, A338, A354 and A30.</p> <p>Until the Salisbury road network has undergone a complete and thorough overhaul, it is our opinion that the proposal to construct this quantity and density of housing in this particular location would be nigh-on catastrophic for the free flow of traffic on Salisbury's arterial and local roads, which are already at bursting point, and we trust that our views will be given appropriate discussion and consideration.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1173	Consultee Mr Giles Lewis Person ID: 1126846	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	H3.1 I object to the allocation for the following reasons: · I think you should look carefully at the way you are allocating or expressing the allocation of the site, and whether you need to be more specific as to your requirement, otherwise given the area of land that you are proposing (63 hectares) the community will end up with much more than 640 houses. For example, using a generous housing density you only really need 20 ha plus greenspace which you have identified as 10 ha, so you should only be allocating 30 ha of land at this juncture (plus any employment land required). Alternatively rather than reducing the site area you could increase the green space requirement in negotiation with the housebuilder. Otherwise there is a danger say up to 1200 houses could be delivered on the site. The plan is supposed to provide certainty to the community and the current size of the allocation does not provide this and therefore the size of the allocation is not justified or effective. Reduce the site area to represent the amount of development you want to allocate to make the plan effective rather than the area of land the developer wants allocation. This is to ensure there are no surprises to the community later on as the site as allocated could probably fit up to 1300 houses on it. Consider all types of development, that could also result in reduced transport movements eg. small supermarket. Ensure good design in keeping with Harnham village. The plan is not fully justified and therefore not effective, positively prepared or consistent with national policy for reason's expressed above.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1174	Consultee Richard and Christine Henderson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126946	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Proposed 840 homes in Harnham, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>To whom it may concern:</p> <p>I am writing with our objections to the proposed building of houses and a school on the Netherhampton Road site. It would appear the plans to build the houses does not include improving the infrastructure, we have roads all around Harnham that are incapable of taking any more traffic. I regularly find myself in queues whichever way I try to drive whether it be towards Wilton or towards Salisbury.</p> <p>I have lived in Harnham many years and have seen the fields on which the building is to take place flooded for large parts of the winter and spring months.</p> <p>Already there is too much traffic through Harnham and I understand that the Britford Meadows plans were rejected as it was felt that the roads were unable to take the increase in traffic that would ensue. I would be interested in how the same roads would now be able to take an increase in traffic for the Netherhampton Build?</p> <p>Not only would the 840 houses and school mean the roads would be busier after they would be built but the lorries carrying the material to build these houses would have a significant impact on the roads.</p> <p>I would like our objections to be noted.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1175	Consultee Ms Pat Pegrum	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126976	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to object to the development of the fields adjacent to Church Lane Trowbridge on the grounds of damage to the natural environment. Recently my husband and I have been monitoring our bat population in our garden which abuts these fields. Using a recognised bat monitor (Echo Meter Touch 2) we have discovered that 14 species of bats forage in our garden and the adjacent fields. and that one of these species is the very rare Bechstein bat. I would submit therefore that this area has great ecological value and should not be developed. PS The Echo Meter Touch 2 is a device know to and accepted by your Environmental Service</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1176	Consultee Mr Giles Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>This site should be removed from the plan as the area experiences groundwater flooding and sits outside of the Harnham flood defences. You should not allocate land for people to live on that could flood in the future.</p> <p>Remove the site from the plan.</p> <p>Ensure transport model is produced to justify plan in line with NPPF prior to any site being taken further through the process.</p> <p>It has not been justified through evidence - flooding, transport etc and therefore is not consistent with national policy or positively prepared. The site should be removed.</p> <p>Remove the site.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1177	Consultee Mrs Adele Evans	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126969		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Harnham/Netherhampton Road Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>There are considerable transport & infrastructure impacts which in my view make the site Harnham/Netherhampton housing site allocation unsound.</p> <p>I believe that the current road infrastructure cannot support 840 further houses. The Netherhampton Road already has the Cattle Market, an Industrial estate with a large removal firm (Armishaws) a garden centre, and an In Excess outlet. Traffic uses the road A3094 as a bypass from A338 & A354 to Wilton, the A36 and A360.</p> <p>I therefore think that a new road infrastructure needs to be in place before this site is considered for housing.</p> <p>No thank you.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1178	Consultee Mr Roger Davis Munrow	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446889	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to protest as strongly as I can against this proposed development It will turn this present predominantly rural area into an urbanised suburb and cause the busy A 3094, already choked at both ends during rush hours, to become even busier. It will create a miserable environment not only for those already living in West Harnham and Netherhampton, but also for the residents of this proposed development. If the Council gives this scheme its approval, it will be an act of planning vandalism for which it will never be forgiven.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1179	Consultee Mr John Joseph Tinney	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126987	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing with regards to the proposed development of 740 homes along the Netherhampton Road. I have viewed the plans with both dismay and complete astonishment that such a development is even being considered.</p> <p>Primarily the infrastructure does not lend itself to such a development. The narrow Netherhampton and Harnham roads are inadequate now, without the potential of at least another 1500 vehicles using the road. The narrow main road lined with housing, the medieval burial ground in the middle of the Netherampton Road, and the narrow bridges into the city itself just were not built for today's 2 or 3 car families.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1180	Consultee Mr John Joseph Tinney	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126987	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Furthermore, with regard to the erection of houses on the North side of Netherhampton Road, has the flood plain even been considered. Many of the houses built on that side of the road are prone to flooding when the water levels rise, and many have had to be underpinned due to subsidence. Indeed, the proposal for a link road from Churchfields Endustrial estate to Harnham was rejected due to this fact.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1181	Consultee Mr John Joseph Tinney	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126987	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Lastly I would like to challenge the planning committee and the developers to visit the area of Harnham Hill. This is a beautiful area and will be blighted forever by the development if it gets the go ahead. It is also part of old Christchurch way walk.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1182	Consultee Dr Rachael Wyre	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125989		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Land at Netherhampton Road. S1028		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Netherhampton road is already chaotic with too much traffic and hard for cars to pull out. The infrastructure is not adequate to support the proposed 640 houses in this site and all the cars that would be associated with them. Better roads need to be in place such as a bypass of the Harnham area before any more houses are built.</p> <p>The plan does not address the poor road infrastructure. Build a bypass.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1183	Consultee Mr John Joseph Tinney	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126987	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is an abundance of wildlife; badgers, foxes, owls and red kites to name but a few.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1184	Consultee Mr John Joseph Tinney	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126987	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This is also prime arable land which is slowly diminishing in the UK. This area should be preserved for generations to come.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1185	Consultee Mr Roger McCartney	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126992		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I consider the plan is not legally compliant. The site identified in figure 5.10 has been used by the local residents for "lawful sports and pastimes" for a period considerably in excess of 20 years. It should therefore be included in the Register of Towns and Village Greens under the provisions of the Commons Act 2006 - Section 15, and given protected status.</p> <p>2. In the alternative, removing this facility is contrary to the NPPF, paragraphs 69 - 70, page 17; and paragraphs 73 - 78 pages 18 - 19.</p> <p>Paragraph 7 - Changes to make the Plan Compliant None. This is a red line issue.</p> <p>Paragraph 6 - Information in Support of my Submission.</p> <p>3. Currently, site H2.6 is designated as a green buffer zone, providing a distinct boundary between the southern boundary of Trowbridge and the nearby villages of Southwick and North Bradley. It has at least three public footpaths running across it, with links to Southwick Court, the Axe and Cleaver bridle path and the two neighbouring villages. It is used by local residents for recreational purposes, in particular, dog walking, jogging, flying model aircraft, ball games, golf practice, and by groups of young people as a meeting place. In the past I have used the field to help my grand children with various nature projects, usually connected with topic work set by the Grove school.</p> <p>4. This open land has become more valuable as local recreation facilities have been withdrawn. For example, the Bradley Road football field was available for local residents to use. The Town Council bought the freehold of the field, it has been fenced off (using an imposing six foot high metal fence), and the public right of way across the field was closed in January 2015. It is now for the sole use of the football club. Prior to this loss, the White Ensign Club recreation field (now B&Q), and the Cow and Gate cricket pitch and pavilion (now the B&M car park) were sold for development.</p> <p>5. Cyclists have been banned from using Boundary Walk, a broad traffic free asphalt path.</p> <p>6. Site H2.6 is close to Southwick Country Park. A report on the options for the development of the Park was prepared by consultants Kit Campbell Associates and presented to the former West Wiltshire Council Cabinet on the 3 May 2006, Agenda Item 9. This report states far more eloquently than I the issues relating to the park.</p> <p>7. Infilling open spaces on existing housing estates, and building houses on new estates with smaller gardens, is increasing the density of urban development. More traffic on the roads, and a lack of cycle paths, restricts the ability of younger children to use the remaining open spaces.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1186	Consultee Mr Roger McCartney Person ID: 1126992	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan is not sound. The historic importance of the site is underestimated, and the proposals are not consistent with paragraphs 132 - 141 of the NPPF.</p> <p>Paragraph 5 - Reason the Plan is not Sound</p> <p>I note that a Heritage Impact Assessment has been requested. Paragraph 5.78 of the Draft Plan, refers to "Southwick Court Farmstead". It is a Medieval Manor House with a moat. The earliest written record dates from c1421. It is of national significance. For example, it was the home of John Stafford, who became Archbishop of Canterbury 1443 to 1452. He served Henry V as Lord Privy Seal, 1421 to 1422. Under Henry VI he was Lord Privy Seal and Lord High Treasurer 1422 to 1426, and also Lord Chancellor 1432 to 1450. His mother, Lady Emma Stafford is buried in St Nicholas Church, North Bradley. Humphrey Stafford, grand nephew of John Stafford, entered Parliament in 1641 as Lord Stafford of Southwick. He supported the Yorkists during the Wars of the Roses. King Edward IV created him the 1st Earl of Devon on the 17 May 1649. Later that year, the Yorkist army was defeated at Edgecombe. Stafford escaped from the battlefield, but was captured by a mob in Bridgewater and executed on the 17th August 1649.</p> <p>Originally Southwick Manor had extensive land attached to it. The "ingrounds" around the Manor consisted of "7 closes" of some 97 acres. (The Victorian History of Wiltshire vol 8). A medieval water meadow still exists on the site.</p> <p>There is already a significant solar panel farm visible from the Southwick Court site. Moving the existing boundaries, and building houses close to the Manor, would further detract from the site.</p> <p>Paragraph 7 - Changes Necessary to the Plan</p> <p>At the western end of the site is Southwick Country Park. In 2006 the former West Wiltshire District Council received a recommendation, from Consultants, to develop Biss Meadows at the expense of Southwick. The Council was advised to undertake only minimum conservation work, so not to prejudice any future development of the site. At the eastern end of the Southwick Court site, but separated by one field, is the Trowbridge Football Club ground. Club facilities are basic, and the site is liable to flooding. It is fenced off to members of the public, and in January 2015 a public right of way across the field was closed.</p> <p>A restored water meadow, with an area of land crossed by public footpaths, and with established wildlife would provide an alternative to the Southwick Park. Moving the football field to the Country Park would potentially provide a bigger and better site for the club. Links, over the</p>				

	Frome Road and to the Bradley Road site via Boundary Walk would give walkers and cyclists access to all three areas. It may be possible to build houses on a brownfield site in the town centre, to pay for any development work. Apparently, constraints on the Southwick Park prevent it being used for housing.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1187	Consultee Mr Roger McCartney	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126992		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. The plan is not sound. Access to the site has not been identified. Paragraph 6 Information in Support of my Submission</p> <p>2. Paragraph 32 of the NPPF states "Plans and decisions should take account of whether: -</p> <ul style="list-style-type: none"> • safe and suitable access to the site can be achieved for all people" <p>3. Guidance issued on the 13 March 2015 by the Department for Communities and Local Government states that the key aspects that need to be addressed include: - "... accessibility, congestion, mobility, safety, pollution, affordability, carbon reduction ... including existing settlements and proposed land allocations" Paragraph 005 Reference ID: 54-005-20141010 Revision Date 10 10 2014</p> <p>4. 180 houses will require a distributor road to be constructed. Access to the Frome Road seems unlikely, because of the impact upon the ancient water meadow and the Grade II listed buildings. Developing a link to Silver Street Lane, via Balmoral/Sandringham Road or Marston Road raises the following issues: -</p> <ul style="list-style-type: none"> • the existing local streets cannot be upgraded to a distributor road; • there are no cycle routes in the area; • destruction of the peace and tranquility of the existing housing estates, by generating noise, air pollution and creating safety issues for the current residents; • destruction of part of the boundary hedge disrupting the bats; and • considerable traffic conflicts where the road joins Silver Street Lane, particularly during school term time. <p>5. Normally, services such as water, sewerage, electricity, gas, communication cables and so on, follow a distributor road. Has an objective assessment been made of these issues?</p> <p>Paragraph 7 - Changes to make the Plan Compliant</p> <p>I note that the draft plan proposes to build houses up to the boundary of the White Horse Business Park, consequently restricting the ability to extend the business park at a future date. Can these proposed houses, and those proposed for site H2.6, Southwick Court, be relocated to a brownfield site in Trowbridge, (including the empty Manvers House building, or the former Town Bridge Vauxhall garage)? Alternatively, I note that James Dyson has initiated plans to develop the former RAF Hullavington base, providing some new 3,500 jobs. Cannot houses be built closer to Hullavington?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1188	Consultee Mr Jeremy Rogers	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126977		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Table relating to houses in Salisbury - South Wiltshire			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The developments around Salisbury are very piecemeal and there does not seem to be any thought given to the infrastructure - most particular road building to support this. The road set up in Salisbury is already poor and cannot support the developments proposed Particularly the development on Netherhampton Road need no roads or a new road management system to alleviate the huge congestion that will be caused by building 840 new homes on one (already congested) road. A relief road around Harnham so that through traffic (it is currently used by many heavy lorries to bypass Salisbury) avoids this road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1189	Consultee Mr Roger McCartney	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126992		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. The plan is not sound. It is not consistent with national guidance. Trowbridge lacks the public sector funded infrastructure (ie roads, sport and leisure activities) to support the proposed development. Paragraph 5 - Reason the Plan is not Sound</p> <p>2. The road system. The Department and Local Government guidance note "Transport evidence bases in plan making and decision taking", published on the 13 March 2015 recommends that transport implications should be assessed during the development of the local plan. In the case of Southwick Court, the draft plan has not identified the access to the proposed site. Traffic calming measures in College Road, and parking restrictions on Hawthorne Grove have already increased the risks for adults and children crossing Silver Street Lane on their way to the Grove school. Additional traffic from Southwick Court will considerably increase these safety issues, if access is via Silver Street Lane.</p> <p>3. The development of other sites in the southern area of town, including the former WWDC site on Bradley Road, will put further pressure on the local road system.</p> <p>4. Indoor Leisure Facilities. Trowbridge is one of three principal settlements in Wiltshire. The principle facilities in the town, funded by Wiltshire Council are: -</p> <ul style="list-style-type: none"> • Castle Place Leisure Centre, housed in a former multi screen cinema; and • Trowbridge Sports Centre, a joint use facility based at the Clarendon Academy site on Frome Road. <p>These facilities compare unfavourably with those at Chippenham and Salisbury. WWDC, in the Recreation and Development Plan 2009, (the Plan) acknowledged that the Castle Place Leisure Centre should be relocated and the Trowbridge Sports Centre refurbished. The Plan also sought to encourage joint development of indoor facilities with secondary schools. As a principal settlement, Trowbridge should have stand alone sites to allow the provision of social facilities, in particular cafes/restaurants, community rooms etc. for residents to meet.</p> <p>5. Outdoor Sports Facilities. The Plan also highlighted the "inadequate provision of pitch sports" especially in Melksham, Trowbridge and Westbury. The County Council announced on the 13 February 2017 the opening of a "new £7.3m state of the art grassroots sports hub", including 16 football and rugby pitches. This is in Melksham, and only part of a much larger project. The only recent investment in Trowbridge appears to be the purchase of the freehold of the existing Trowbridge Town FC ground, believed to have cost around £350,000. The new GP Adcroft Health Centre has been built on the practice pitch of the Cricket Club, thus reducing outdoor facilities.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1190	Consultee Dr Rachael Wyre	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125989		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road S1027		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The roads are already too busy and the infrastructure is inadequate to support traffic from an additional 100 houses. The plan does not allow for this and is therefore unsound.</p> <p>Build a Harnham bypass before considering allocating land to house building. your feedback form is not user friendly. It needs redesigning to avoid repetition and if you want specific parts of a plan with reference numbers, provide it in a drop down box to aid users.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1191	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.21, H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It has not taken into account nor properly costed and funded the full impact on local services and utilities and assumes a great deal from the willingness of developers to contribute.</p> <p>It fails to link H3.1 with H3.3 which both have the same environmental and resource impacts. Each will severely adversely impact the existing infrastructure and if taken together will overwhelm it.</p> <p>The plans have already identified that local resources will be unable to cope and recommends further study in a number of areas. These must be done before the plan is considered further.</p> <p>Conduct all precursor studies before taking this plan forward.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a Harnham resident and wish to contribute to the debate				

Comment ID:	1192	Consultee Mr Hayes Person ID: 1126986	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Various identified sites within the Trowbridge area have not been included in the DPD/HSPA document eg Bradley Road (former WWDC land) East Wing/Trowbridge Hospital/Margaret Stancomb school Bowyers site Ashton Street centre The Pavillions (White Horse Business Park) You have also failed to allocate the following Trowbridge area sites for new dwellings - Site No 167 Site No 292 Site No 3247 The inclusion of the above mentioned existing sites rather than the introduction of new sites would make the WHSAP a sound document.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1193	Consultee Mr Tim Hounsome Person ID: 403859	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	settlement boundary figure A50 North Bradley				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>NPPF requires development to accord with the development plan, in this case Wiltshire Core Strategy. The Core Strategy acknowledged the need to examine settlement boundaries and as a consequence, and following public consultation, adopted a Methodolgy for assessing them. For reasons set out below the proposed amendments at North Bradley do not comply with the adopted methodology and therefore does not comply with the Core Strategy.</p> <p>Comments on proposed settlement boundary review in respect of North Bradley.</p> <p>My concern relates to land comprised within White Horse Business Park, which is a block of development lying within North Bradley Parish. Settlement Boundary Review Methodology Topic Paper 1 states inter alia: -</p> <p>'The revised settlement boundary review methodology</p> <p>The settlement boundaries define the built form of the settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses.</p> <p>Areas which have been included are:</p> <p>Built and commenced employment development in principal settlements, market towns and local service centers that is physically related to the settlement.</p> <p>Areas which have been excluded are:</p> <p>Isolated development that is physically detached from the settlement (including farm buildings or agricultural buildings and renewable energy installations) Site allocations'</p> <p>White Horse Business Park is isolated from the present built up limits of both Trowbridge and North Bradley. However it is most distinctly separated from Trowbridge by open fields, a lane and a major road. Open fields alone separate it from development in North Bradley. Since this employment land is not 'physically related' to the built up limits of either Trowbridge or North Bradley it is difficult to see how the proposed modification fits with the selection criteria.</p> <p>Moreover since the land in question is mostly built out there is no real reason to change its current status. If there is a need for additional planning control this can be done through the North Bradley Neighbourhood Plan currently being developed. The amendment should be deleted. Confusingly the amendment plan does not indicate whether the employment land is to be regarded as an amendment to the settlement boundary of Trowbridge or an amendment to that of North Bradley. In either case the proposal does not meet the requirement of the methodology criteria, as stated above.</p> <p>Additionally the amended settlement boundary behind properties on the eastern side of Woodmarsh does not follow the current built situation in that the boundary behind the properties should be constant not broken by artificial deviations to the road frontage. It is accepted that there are small gaps in the frontage but these read as part of the built up area of the village. Thus the line for example should go behind Nos. 16 and 18 Woodmarsh. These amendments may lead to pressure for infill development but such development would not be significant given the extent of frontage development along Woodmarsh.</p>			

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1194	Consultee Mrs S Willcock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127006	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my deep concerns regarding the Draft Wiltshire Housing Sites Allocation Plan in Trowbridge. I live on Frome road near the country park next to the Church Lane and Southwick Court sites. I understand these two sites have been put forward as preferred sites within the housing allocation plan. I would like to raise the following concerns:-</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that the local policy should provide:- The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environment and historic interest and look to enhance the natural, built and historic environment. I do not believe the current strategy delivers on either the development or infrastructure required by Trowbridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1195	Consultee Mrs S Willcock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127006	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The council appears to have completely ignored the many brownfield sites available in the town centre. If the mission is to attract more people to live in the Town, surely the rejuvenation of the available brown field sites should be the priority? Areas of the Town centre are an absolute 'eyesore', but could so easily be knocked down or converted into wonderfully desirable living accommodation.</p> <p>Building on the proposed sites is just a short- sighted fix to a long- term problem and is not sustainable. As a local resident I am aware that a private individual has applied at least twice in the past for building permission on the lad bordering Frame Road, Southwick country park and Church Lane but has been refused permission for valid reasons and surely these reasons still apply. And as a local resident I am also aware that the area was flagged as a risk to flooding on my searches. So, why would anyone build on such a site? I consider it outrageous this greenfield site which has had planning permission previously denied is now a site proposed by the council.</p> <p>Also as a resident I am appalled that this information has only come to me from another resident, it all feels a little underhand and sneaky!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1196	Consultee Mrs S Willcock Person ID: 1127006	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from the sites 3565, 3620 and 1021</p> <p>The A361 is a known accident blackspot and already at capacity during 'rush hours'. The proposed access point will only make the matter worse. The road will not be able to support the extra traffic and will be extremely dangerous. The sites at Church Lane, Southwick Court and Old Brickfields are being considered as it is believed they would reduce traffic (as residents would walk into Trowbridge rather than use their own vehicles!) Ridiculous suggestion, as I resident I can tell you I would not consider walking into Town, it's at least a 3 mile round trip, factor into that carrying shopping bags etc.</p> <p>The most logical way to reduce traffic is to develop the previously mentioned brownfield sites already in the town centre. No evidence has been provided to support the theory that people will walk into the town</p> <p>With the number of new houses you are proposing in the area, with a conservative estimate that each household would have an additional two vehicles this would a negative impact on an already congested Route. The council's view that this is justified as it provides development is clearly in question. There is not the infrastructure in place for a development of this size.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1197	Consultee Mrs S Willcock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127006	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from the sites 3565, 3620 and 1021</p> <p>The A361 is a known accident blackspot and already at capacity during 'rush hours'. The proposed access point will only make the matter worse. The road will not be able to support the extra traffic and will be extremely dangerous. The sites at Church Lane, Southwick Court and Old Brickfields are being considered as it is believed they would reduce traffic (as residents would walk into Trowbridge rather than use their own vehicles!) Ridiculous suggestion, as I resident I can tell you I would not consider walking into Town, it's at least a 3 mile round trip, factor into that carrying shopping bags etc.</p> <p>The most logical way to reduce traffic is to develop the previously mentioned brownfield sites already in the town centre. No evidence has been provided to support the theory that people will walk into the town</p> <p>With the number of new houses you are proposing in the area, with a conservative estimate that each household would have an additional two vehicles this would a negative impact on an already congested Route. The council's view that this is justified as it provides development is clearly in question. There is not the infrastructure in place for a development of this size.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1198	Consultee Mrs S Willcock	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127006		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from the sites 3565, 3620 and 1021</p> <p>The A361 is a known accident blackspot and already at capacity during 'rush hours'. The proposed access point will only make the matter worse. The road will not be able to support the extra traffic and will be extremely dangerous. The sites at Church Lane, Southwick Court and Old Brickfields are being considered as it is believed they would reduce traffic (as residents would walk into Trowbridge rather than use their own vehicles!) Ridiculous suggestion, as I resident I can tell you I would not consider walking into Town, it's at least a 3 mile round trip, factor into that carrying shopping bags etc.</p> <p>The most logical way to reduce traffic is to develop the previously mentioned brownfield sites already in the town centre. No evidence has been provided to support the theory that people will walk into the town</p> <p>With the number of new houses you are proposing in the area, with a conservative estimate that each household would have an additional two vehicles this would a negative impact on an already congested Route. The council's view that this is justified as it provides development is clearly in question. There is not the infrastructure in place for a development of this size.</p> <p>With the number of new houses you are proposing in the area, with a conservative estimate that each household would have an additional two vehicles this would a negative impact on an already congested Route. The council's view that this is justified as it provides development is clearly in question. There is not the infrastructure in place for a development of this size.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1199	Consultee Mrs S Willcock	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127006		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620</p> <p>The fields behind Church Lane, Frame Road and Oldbrick Fields are well known habitats for many deer, foraging rare (and protected) bats, rabbits, voles and a host of birds. The ancient hedgerows and fields provide the setting for many listed buildings as well as an archaeological site of an ancient water meadow. These require protection as stated in the national Planning Framework and the Core Strategy itself! It's a shame that the council are content to build on these greenfield sites which provide such an essential home to wildlife as it is easier than regenerating areas within the Town which are in desperate need.</p> <p>I thank you for taking the time to read my letter, and hope that my points and concerns (which are echoed by many in the area) will be taken into consideration.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1200	Consultee Mrs S Willcock	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127006		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620</p> <p>The fields behind Church Lane, Frame Road and Oldbrick Fields are well known habitats for many deer, foraging rare (and protected) bats, rabbits, voles and a host of birds. The ancient hedgerows and fields provide the setting for many listed buildings as well as an archaeological site of an ancient water meadow. These require protection as stated in the national Planning Framework and the Core Strategy itself! It's a shame that the council are content to build on these greenfield sites which provide such an essential home to wildlife as it is easier than regenerating areas within the Town which are in desperate need.</p> <p>I thank you for taking the time to read my letter, and hope that my points and concerns (which are echoed by many in the area) will be taken into consideration.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1201	Consultee Mr Tim Hounsome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 403859		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Site Allocations - Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Comments on Draft Housing Allocation Plan – Trowbridge Community Area General Comments on sites to the south of Trowbridge. Section 5.150 of the Wiltshire Core Strategy (Trowbridge Area Strategy) acknowledges the need to keep the villages of Southwick and North Bradley physically separate from the current built up limits of Trowbridge and to maintain their distinct character and identity. This can only realistically be achieved through keeping open land between the settlements. The southern allocations represent an opportunity to achieve separation and at the same time create additional benefit by establishing a linear park or green space linking Southwick Country Park in the west right through to the development on the east of the railway line and in particular to the bat sensitive areas. There could additionally be links to the Biss Brook project. Apart from maintaining separation, this green space would also meet a number of other objectives notably. Core Policy 51 – landscape notably ii and iii Core Policy 52 – Green Infrastructure The need to support/protect/supplement the foraging, roosting and breeding areas for bats on the southern edge of Trowbridge – some of which are to be lost to development. Support access to open space, country parks and the countryside, which was seen as a high priority and achieved high usage scores in the Wiltshire Open Space Study 2015 – 2026. Reference (in each sites supporting text) to the opportunity of creating a linear park/green space would ensure the necessary open space, landscaping and bat corridors referred to in each of the allocated areas are appropriately designed for proper linkage.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1202	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.19, H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It has not taken into account nor properly costed and funded the full impact on local services and utilities and assumes a great deal from the willingness of developers to contribute.</p> <p>It fails to link H3.3 with H3.1 which both have the same environmental and resource impacts. Each will severely adversely impact the existing infrastructure and if taken together will overwhelm it.</p> <p>The plans have already identified that local resources will be unable to cope and recommends further study in a number of areas. These must be done before the plan is considered further.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a Harnham resident and wish to contribute to the debate.				

Comment ID:	1203	Consultee Mr John Fullegar	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125498		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I do not believe the draft Wiltshire Housing site allocations plan is sound because: 1) Developing the site in question (H2.2 Land off of the A363 at White Horse Business Park, Trowbridge) would lead to North Bradley losing it's Village identity and merging the village with the Town of Trowbridge. 5) Site H2.2 is adding development to North Bradley not Trowbridge, since this site is contained within the Parish of North Bradley and is part of North Bradley village, it should not be used to allocate Trowbridge housing demands to. Don't develop the site in question (H2.2 Land off of the A363 at White Horse Business Park, Trowbridge) instead look to develop existing brown field sites in Trowbridge.2 2) Whilst site H2.2 is only allocated for 150 houses at this time, due to the large size of the site, what measures would be taken to ensure these 150 houses were not built in a small area of the site, and further houses filling up the site at a later date?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure points are clearly understood				

Comment ID:	1204	Consultee Mr John Fullegar	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125498		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I do not believe the draft Wiltshire Housing site allocations plan is sound because:</p> <p>2) Site H2.2 is situated in a very busy traffic blackspot, currently at peak hours traffic is queued up from Yarnbrook roundabout through to the A363 roundabout joining Westbury road and Phillips Way, and also queued right back along Bradley road to Wood Marsh, adding another 150 houses with cars to this is not sustainable. Don't develop the site in question (H2.2 Land off of the A363 at White Horse Business Park, Trowbridge) instead look to develop existing brown field sites in Trowbridge.</p> <p>2) Whilst site H2.2 is only allocated for 150 houses at this time, due to the large size of the site, what measures would be taken to ensure these 150 houses were not built in a small area of the site, and further houses filling up the site at a later date?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure points are clearly understood				

Comment ID:	1205	Consultee Mrs Janis Cadby	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126753		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		All		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>i'm unable to answer if this is legal or not, as i'm not a lawyer. However, i can't see its legal to loose a village status, into a town, when the town is not fulfilling its housing allocation!</p> <p>The Wiltshire core strategy document discusses the fact that villages & rural areas are to have a limited level of development, in order to help retain the vitality of these communities. The number of the proposed houses for the North Bradley area, goes against this core strategy completely, as we would no long have this village status & would be considered as part of Trowbridge itself. We are already experiencing high volumes of traffic, including heavy goods vehicles. We don't have the infrastructure to cope with additional housing.</p> <p>Areas for development are evident within the town centre & must be considered, before the destruction of the rural communities around the town. Although i understand there is a housing crisis and that we need to assist in rectifying this situation, I would never support the complete destruction of our village in order to facilitate this.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Because i believe everyone views are important & should be heard!				

Comment ID:	1206	Consultee Mrs Hayley Goddard	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126834		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Development of the land on Netherhampton Road on this scale is not sustainable. Bearing in mind that the site is not considered to be in walking or cycling distance of the City Centre, the development will cause a significant increase in traffic along the Netherhampton Road and the Harnham Road towards the Harnham Junction and the Park Wall Junction which are already congested and operating at capacity. The road is not capable of widening and there is very little scope for improvement of traffic flow and at these junctions to alleviate the problem that exists already. I don't believe a refresh of the Salisbury Transport Strategy will be able to address this. The ring-road round Salisbury is the meeting point of many major A-roads and is frequently congested. An increase in housing will increase this traffic and Salisbury does not have the capacity for more traffic on these roads. If they are really needed, more suitable sites for development across Wiltshire should be sought.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1207	Consultee Mr Tim Hounsome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 403859		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There seems to be no reference to any strategic highway plan for Trowbridge. At the moment there is a saying that ‘ all roads into Trowbridge lead to a traffic jam!’ The allocations to the south of Trowbridge and particularly those at and adjoining North Bradley, will clearly exacerbate the problem unless there is some relief network proposed. The strategic improvements to the A350 at Yarnbrook and West Ashton are high ranking in highway plans. It is essential therefore that the relief road running through site 262 etc. together with links to new housing areas is committed to and programmed before the proposed allocation at North Bradley takes place.</p> <p>Core Strategy strategic objective 6 and Policy 3 require infrastructure delivery plans to be in place before development takes place. Consequently the text supporting the allocation needs to be explicit about securing infrastructure before development takes place.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1208	Consultee Keith Muston Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Chapmanslade Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Consultation was discussed at the Chapmanslade Parish Council held on 31st August 2017 at Chapmanslade Village Hall. The discussion was able to benefit from the results of a detailed village survey which covered many subject areas but in particular there was a section on housing.</p> <p>There was no clear decision on the need for housing but there was a preference for smaller developments. There was a clear decision that any development should have some affordable housing and this would ideally be a mix of affordable to buy or to rent. There was a significant number of respondees to the questionnaire who expressed neither a positive or negative opinion.</p> <p>There was a lengthy discussion of the main site identified, Barthers for 35 houses, but the discussion widened to the total housing requirement across the Warminster Without area. Taking into account possible development in other surrounding villages the conclusion was that Chapmanslade should not be allocated more than 9 houses. It was considered that this number of houses could materialize within the village boundary by windfall development and infill sites.</p> <p>The conclusion of the Parish Council was to oppose all the proposals for Chapmanslade in the consultation document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1209	Consultee Keith Muston Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Chapmanslade Parish Council Person ID: 1127016		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.53			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There was a discussion regarding the settlement boundary and it was agreed that the Chapmanslade Village Hall and amenity area should remain outside of the settlement boundary, as is currently the case.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1210	Consultee M&C Mould and A&J Richards Consortium	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 901852	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land at Frogmore Road, Westbury (SHLAA Ref: 3218)</p> <p>Policy H2: we consider that the draft Plan should be making provision for additional housing growth in the Westbury Community Area on the following basis:</p> <p>The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026.</p> <p>There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative deliverable sites in Westbury, which is the next tier down in the Core Strategy settlement hierarchy.</p> <p>There is an unmet affordable housing need in Westbury which can only be addressed by the provision of new housing to subsidise the provision of new affordable housing.</p> <p>There is no Neighbourhood Plan being prepared for Westbury.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in the Westbury Community Area, that the subject site should be included as an allocation for circa 150 homes in the draft Plan.</p> <p>Site context: the subject site of approximately 5.2 ha comprises a triangular shaped arable field with defensible boundaries: on two sides by the railway line, and on the western side by Frogmore Road.</p> <p>The site is relatively flat and unconstrained. In landscape terms the site is very well contained, and apart from the tree buffer on the western edge there is very little ecological interest.</p> <p>In spatial planning terms, the subject site lies within an area where there has been considerable new residential development, and its development would represent a natural rounding off of the settlement with potential to form a new permanent boundary to the north side Westbury.</p> <p>The site performs well in accessibility terms lying in good proximity to both the Westbury town centre and the mainline railway station. Our initial assessment of the site suggests that it could accommodate circa 150 dwellings also making provision of onsite public open space and strategic landscaping.</p> <p>Statement of Common Ground: the landowning consortium confirms their willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that the landowner would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: Wiltshire Council to allocate the subject site for circa 150 dwelling units as outlined in enclosed Site Location Plan (SHLAA Ref: 3218).</p>				
Attached files (Please see Objective)	4714720				

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To make the planning case for the subject 'omission' site (SHLAA Ref: 3218) to be included as an allocation in the draft Plan.

Comment ID:	1211	Consultee Mr Jeremy Rogers	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126977		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.6 Traffic Implications			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Traffic Congestion on the Netherhampton Road in the Netherhampton Road development in Salisbury has not been fully considered. An extra 840 homes on this one road will lead to traffic congestion that potentially could lead to gridlock in the Salisbury area. This plan should not have been put forward without the traffic arrangements being reviewed also with congestion alleviation schemes included in the infrastructure plan. A thorough review of the road infrastructure for Salisbury is needed as well as the area around the proposed Netherhampton Road development. There are too many houses being built on one road and traffic management alone will not cope with this. Bypasses or restricted access to the Netherhampton road seem like the only way this will work. Please consider carefully the road infrastructure around the Netherhampton area - it will not work as currently planned.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1212	Consultee Ms Helga Rawlins	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127034		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I hope you have read this week's Journal regarding the building of new homes on the Netherhampton Road. The opinion of people is clear and it is a NO. The road is already choc a bloc, without traffic lights one would not be able to cross safely. More lorries than ever! Is one death not enough?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1213	Consultee Ms Helga Rawlins	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127034		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is flooding!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1214	Consultee Ms Helga Rawlins	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127034		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It concerns me greatly that it is offered to anyone (the homes). How is that going to help the young people! I hope you will reconsider your plan, for this one is hopeless. Where is John Glen in your plans?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1215	Consultee Mr Jeremy Rogers	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126977		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.136			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	This land cannot be developed with so many houses until the suggested traffic examination is carried out. The works involved are liable to be huge - Bypasses for Salisbury in several places where permission is unlikely to be granted - eg Watermeadows, etc Do the traffic planning first or this is a non-starter.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1216	Consultee Moore Allen and Innocent Person ID: 393425	Agent Mr Martin Miller Technical Director Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Hullavington and the Sustainability Appraisal		Positively prepared Justified Effective Consistent with national policy		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Introduction</p> <p>1.1 Terence O'Rourke Ltd has been appointed by Moore Allen @ Innocent to respond to the current consultation on the draft Wiltshire Site Allocations DPD (the draft DPD). Moore Allen @ Innocent retains land interests at Hullavington, which offer the opportunity to secure sustainable plan led development.</p> <p>1.2 This representation deals with a number of concerns principally: The DPD has not been brought forward in the way envisaged when the Core Strategy inspector found the Core Strategy to be sound, particularly with respect to meeting the objective assessment of housing need (OAN). This is inconsistent with the NPPF. The evidence base is insufficient, in particular the sustainability appraisal and the topic papers have not been positively prepared because the Council started from a point of not assessing all of the opportunities for sustainable development across Wiltshire as part of the process. The output is that reasonable alternatives have not been considered. Also, that the plan will not be resilient and will be ineffective in meeting housing need, including addressing affordability issues. Overall the plan cannot be considered sound as it is not positively prepared, justified or consistent with national policy.</p> <p>1.3 Site-specific representations, and the justification as to why various sites should be allocated in the draft DPD, have been provided separately.</p> <p>Positively prepared</p> <p>1.4 Paragraph 47 of the Framework states that a Local Plan should meet the full objectively assessed needs for market and affordable housing in the relevant HMA as far as is consistent with the other policies of the Framework. There has been no attempt in the draft plan to meet the objectively assessed need (OAN) as set out below.</p> <p>1.5 The Wiltshire Core Strategy Inspectors report at paragraph 78 identified the OAN as around 44,000 and later in paragraph 80 stated "... the sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly".</p> <p>1.6 The inspectors report goes on to state "Indeed, I am particularly mindful that the Council intends to produce a new SHMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes. Consequently I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more".</p> <p>1.7 As stated this was the 'minimum housing figure' and is not the OAN. The Inspector was expecting a revised SHMA with a new OAN in early 2016 and clearly set an expectation that Wiltshire Council should be planning, through subsequent DPDs, to meet this OAN as well as the 'Swindon allowance' (900 homes) because the latter does not meet the housing needs Wiltshire. No updated SHMA with revised OAN has been published to date. Nevertheless, the most recent evidence, as reported to the Swindon Wiltshire Local Enterprise Partnership on 14 February</p>				

2017 and correlating with the Government's recently published OAN figures using a standard methodology (currently subject to consultation), is that the OAN remains at or above 44,000 homes across a 20 year period.

1.8 It is surprising that the consultation document makes no mention of these requirements, set by the Core Strategy Inspector. Further, whilst it is noted that the Site Allocations DPD proposes to allocate more than the minimum requirement, the additional provision, only amounts to 996 dwellings (above the minimum requirement) which falls significantly short of meeting the OAN and making up for the Swindon allowance. If these OAN/Swindon allowance requirements are to be met, in accordance with the NPPF and Government imperative to boost the supply of housing, a further circa 2,500 homes should be identified/allocated across Wiltshire within the DPD. A positive approach must be taken, looking for opportunities to accommodate the homes needed.

1.9 In recognition of the need, the Wiltshire Core Strategy distributed the indicative minimum across each community area, with this only being an indicative minimum due to the lack of a comprehensive evidence base of available sites and their sustainability. Flexibility to deliver more in any one Community Area was fundamental to the soundness of the Core Strategy and to its consistency with the NPPF.

1.10 In this context, the council's insufficient response to the overall numbers through the Site Allocations DPD, as set out above, creates a fundamental lack of soundness within the plan. Further its approach, as put forward in Topic Paper 2, of only assessing opportunities to allocate housing in community areas where the indicative minimum housing requirement has not been met is fundamentally flawed. The approach responds only to appeal success (resulting from sites being released over the last two years through s78 appeals given the presiding shortfall in housing land supply over that period) and fails to provide a positive approach by failing to consider and allow opportunities for sustainable plan led development which could assist settlements in meeting their own housing (market and affordable) and economic / community needs and assist more widely in meeting the full OAN across Wiltshire, as required by national policy.

1.11 In addition, the objective for the plan to "demonstrate a rolling five year supply" and to "allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy" does not go far enough. An objective of the DPD should be to meet the OAN, and the DPD should be allocating sufficient sites to meet the OAN, not the minimum housing figure, in order to be consistent with National Policy.

1.12 In the preparation of the site allocations plan, the council should have firstly understood the capacity of all promoted sites in each community area (which should have formed the evidence base) to undertake a full sustainability appraisal to determine which are most sustainable to allocate in each housing market area in order to fully meet the OAN.

1.13 The approach that has been taken conflicts with one of the key outcomes set by the core strategy, with an outcome of Objective 3 being: 'providing everyone with access to a decent, affordable home'.

1.14 Paragraph 4.22 of the Core Strategy states that:
"The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Site Allocations DPD, and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan".

1.15 By restricting allocations only to those community areas and settlements that haven't met their indicative requirements, a rigid and negative approach is taken, frustrating sustainable development, contrary to the core strategy and contrary to national policy. The plan is not sound in its current form as it is not positively prepared and inconsistent with national policy.

Effective

1.19 To be effective the NPPF states that the plan should be deliverable over its period, including being based on effective joint working on cross-boundary strategic priorities. One concern is that Wiltshire Council has agreed to work with Swindon Borough Council on housing needs. A revised SHMA was available to the Council 12 months ago, yet the Council has failed to date to publish or take positive action to address the output. We still expect the SHMA to be published imminently, but at this stage it is unclear as to how 'effective joint working' has been undertaken.

1.20 It is of concern that by only allocating development in community areas where the indicative Core Strategy (non OAN) housing requirement has not been met does not allow for a positive response to the findings of the new SHMA, including any re-drawing of housing market areas, does not respond to the considerable housing land supply shortfall in Swindon Borough, does not allow for the OAN to be met and does not allow flexibility and resilience should any of the sites relied upon not deliver as expected. If the Council become a 20% buffer authority the DPD position will become indefensible.

	<p>1.21 To be effective, the plan should take a more flexible approach, allowed for by the Core Strategy and expected by the Core Strategy Inspector when he found that plan sound, and allocate additional sites. Consistent with national policy</p> <p>1.22 As set out above, there are a number of elements of national policy that the draft DPD is not compliant with. In particular the requirement to significantly boost the supply of housing set out in paragraph 47 of the NPPF. This is a Government imperative, supported by the recent Ministerial Statement made alongside publication of the draft standard methodology to calculate OAN. Furthermore the requirement at NPPF paragraph 28 to support economic growth in rural areas. The DPD Fails to take a positive approach to sustainable new development, as one of the starting points to achieve sustainable development (the OAN) has been ignored and the full potential to identify sustainable new housing sites has not been assessed.</p> <p>Summary</p> <p>1.23 In conclusion, the Wiltshire Site Allocations Plan is required to meet four tests to be considered 'sound', as set out in paragraph 182 of the NPPF. It is considered that none of these have been met / demonstrated. The plan is not sound in its current form.</p> <p>1.24 As established at the core strategy examination and supported by more recent evidence, the OAN for Wiltshire is 'around 44,000 dwellings. To be compliant with National Policy, Wiltshire Council should be positively seeking opportunities to allocate sufficient sustainable sites to meet the OAN. Yet, this is not part of the objective of the plan. The plan cannot be considered to be positively prepared or consistent with national policy. It is not sound.</p> <p>1.25 The NPPF requires the plan to be "the most appropriate strategy when assessed against the reasonable alternatives". Allocating development in Community Areas or settlements which have already met their indicative minimums (particularly given the process from which those requirements have been met – which has released sites on their own merits rather than against reasonable alternatives) is clearly a 'reasonable alternative'. The council should have taken a more flexible approach, as allowed for by the Core Strategy and expected by the Core Strategy Inspector, to ensure the most appropriate strategy is proposed. Without having assessed this, the plan cannot be considered justified and is not sound.</p> <p>1.26 There is concern over the effectiveness of the policy, as it is not clear how work with Swindon has been integrated into the proposed plan and how the plan has responded to the redefined Housing Market Areas and difficulty that Swindon has with meeting its own OAN and five-year housing land supply. The Plan, particularly at this stage in its preparation, must respond positively to the most up to date evidence base in order to be effective. This is a key requirement of the NPPF.</p> <p>1.27 It is also of concern that there is no allowance for non-delivery or under delivery in community areas.</p> <p>1.28 The NPPF requires that the plan should "enable the delivery of sustainable development in accordance with the policies in the framework". The plan does not enable the delivery of sustainable development, with opportunities for sustainable development precluded. It is not in accordance with the NPPF requirement to 'significantly boost the supply of housing'.</p>
<p>Attached files (Please see Objective)</p>	<p>4724834</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Moore Allen is the agent for landowners of land surrounding Hullavington that is capable of making a sustainable contribution towards Wiltshire's future housing supply, it is therefore important we are able to participate orally to expand on the comments we have made within this representation.</p>

Comment ID:	1217	Consultee Ms Jennifer Dennis Person ID: 1127043	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I would like to state my objections to the proposed development for the following reasons:-</p> <ol style="list-style-type: none"> 1. In the Wiltshire Core Strategy (paragraph 5.150) states 'It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identities of these villages as separate communities.' 2. I understand that Planning permission has been granted for over 5000 dwellings in Trowbridge that have yet to be completed. Brownfield sites like Bowyers, East Wing, Trowbridge Hospital, the Virgin Building and Margaret Stancomb School are all yet to be decided upon. Surely it is common sense to use these existing sites before despoiling open countryside? Wiltshire Council has been asked to provide 900 homes over plan, with Trowbridge being asked to provide 700 of them. Trowbridge lacks the infrastructure to support this number, whilst Chippenham is situated near the M4 motorway and has a mainline railway station enabling residents an easier commute to centres of employment. 3. The Fields around Southwick Court are pastoral land that is enjoyed by people of all ages - from dog walkers, countryside lovers and children enjoying the freedom to safely run, play, climb trees and explore the streams that bisect the proposed site. 4. The streams tend to flood after heavy rain and the surface water remains for sometime due to the clay content of the ground. Some properties in Sandringham Road and Spring Meadows are low lying and have suffered flooding to homes and gardens in the past. This area is in flood zones 2 & 3 on the Exclusionary Plan. 5. Southwick Court is a grade 11* listed building with many archaeological remains in the adjacent fields - the area of the proposed housing development. Extremely rare post-medieval earthworks will be destroyed, in fact they have already suffered damage from the ill-informed exploratory work. 6. Access to the proposed site cannot be through an ancient and I believe, protected, hedgerow which surrounds the site south of Silver Street Lane. This hedge is an important habitat for many creatures including several families of hedgehog. Woodpeckers and kingfishers have been spotted in the location and buzzard often hunt in the existing pasture land. 7. The location of the site will create unacceptable peril for existing and incoming residents, particularly at rush hour and school times. 8. Local schools do not have spare capacity for this development. 9. Public services and access to transport hubs are out of the specified range of this development, meaning increased use of cars resulting in a lowering of air quality. <p>There is no active support for this site from either Local Council, Environment Agency, Natural England, Historic England or the County Planning Archaeologists, despite such active support being voiced for other sites within the proposal. In fact the response from Natural England states 'conclusions/recommendations in the Trowbridge Community Area Topic Paper have noted that Site 3565 (land East of the A361 at Southwick Court), is considered to be a less sustainable option for the development, and that five moderate adverse effects have been identified with the site'.</p>			

	Whilst I understand that Trowbridge needs to provide new homes I strongly believe that Wiltshire Council should remove Site 3565 (Southwick Court Fields) from the Wiltshire Housing Site Allocation Plan.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1218	Consultee Jarrett	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127005		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		SITE NOS. : H3.1 & H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>There is no requirement for such a large quantity of housing in the area. The UK produces ONLY a very small proportion of its needs, the land will NEVER EVER be returned to productive farmland such as it is at the moment. If only from the subsistence point of view the land should NEVER be built on. We do not own this land we are looking after it for our decendants, if we pave over this paradise we are doomed & will be remembered for our desperate desire to make money before health & welfare.</p> <p>This land is a greenfield site & must NOT be built upon, EVER.</p> <p>This land is a greenfield site & must NOT be built upon, EVER.</p> <p>This land is a greenfield site & must NOT be built upon, EVER</p> <p>This looks to me as if the council are rubbing their hands with glee at the idea of all the council tax they'll be able to milk people for.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		This is OUR countryside, if we aren't visible we can too easily be ignored.			

Comment ID:	1219	Consultee Mr Geoffrey Wheeler	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126772		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>1. The River Nadder Flood Defences built recently at great expense, was based on the current housing. Building such a vast area of housing on the watermeadows and nearby land increases the probability of regular flooding for any new build on the south side of Netherhampton road and of West Harnham .</p> <p>1. Improve sewage systems. 2. Build a Ring road round Wilton and Salisbury to link with A303 and the South.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1220	Consultee Mr Peter Brabner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 705001		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Cassways, Bratton		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site is not a suitable for a large housing development, as: Bratton is a village, and its characteristics need be preserved as such. The site is outside the village settlement boundary, which according to 2.8 is "with limited exceptions, not acceptable". There are other potential sites for development within the existing settlement boundary to meet local need. The Council should address sustainability issues and consider smaller units to be integrated into the existing infrastructure which would reduce the impact on the village and its community. This would also preserve the beauty of the whole area below the White Horse ridge. The current plan seems to take a simplistic approach to try to place a large number of houses in an area which has been highlighted by the local owner, which had been purchased many years ago. The Council's own assessment of the area highlighted a number of sustainability problems. Instead, it is more important to pursue other potential sites for development within the existing settlement boundary to meet local need. For example, the field next to Peartree Orchard is one such area (which is owned by Bratton Parish Council, and which they have raised with Wiltshire Council). Additionally, there are currently planning applications under consideration for the replacement of Oxford House, The Butts, with four dwellings, and the much delayed completion of a 4-bedroom house on land next to 1A Lower Road. In addition, the number of houses proposed is significantly over the number as assessed by the Parish Council's own Housing Survey in 2015 (8 dwellings). The Site Allocations Plan for Bratton seems also to be based on a misrepresentation of the number of houses in Bratton ie there actually less 520 houses, whereas the Council has referred to there being 819 houses!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1221	Consultee Mr Roger Williams Person ID: 1127014	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	Settlement boundary change Sandringham Road Trowbridge and Proposed development site 3565 Southwick Court			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are not legal experts - just ordinary residents trying to make sense of a complicated process, which seems to be over complicated and unnecessarily bureaucratic in our view. We believe there may be regulatory and / or legal issues over the proposals in relation to Sandringham Road settlement boundary changes because of the issue around potential endangerment / destruction of historic hedgerows; ignoring / changing without reasonable purpose historic parish boundaries; potential issue with 50 year moratorium on changes to land use in Sandringham Road; potential issue over supporting speculative development of Green Field sites in priority to regeneration of Brown Field sites; potential failure to provide adequate, timely, effective and reasonable notification of consultation and consultation of to residents directly affected by settlement changes; potential denial of access to residents of relevant information during the consultation; potential issue over loss of habitat to Bechstein Bats; potential issue over building on land known to be susceptible to flooding / potentially against advice of Environment Agency; potential issue over building on land with historic archeological pedigree; potentially denying local residents access to and use of areas of common recreational land; issue over potentially changing established cul-de-sacs into through roads; issue over increasing local traffic pollution in a built up area; issues over proposals which are not supported by sufficient health, education, transport, policing and other required infrastructure.</p> <p>We apologise if these are not strictly "legal" issues but are aspects we believe require review and clarification by the relevant regulatory bodies.</p> <p>Please refer to our pdf document (Letter to County Council 20th September 2017) attached</p> <p>Please refer to our pdf document (Letter to County Council 20th September 2017) attached and the above text</p> <p>Please refer to our pdf document (Letter to County Council 20th September 2017) attached and above text in the legal compliance box.</p> <p>Please refer to our pdf document (Letter to County Council 20th September 2017) attached and above text in the legal compliance box.</p> <p>Please refer to our pdf document (Letter to County Council 20th September 2017) and supporting email text sent by email to Spatial Planning on 21st September 2017 with full comments about our objections to the settlement boundary changes and Housing site allocation plan. The pdf is also attached to ensure compliance.</p>			
Attached files (Please see Objective)	4712569			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The reasons we would wish to take part in the oral part of the examination is because the volume of information we have to present is significant, with a the high degree of relevance to the planning decisions for the Trowbridge area, especially Southwick Court site 3565. We wish to ensure the accuracy of understanding of the points made and be able to answer questions that these points may raise in the mind of the inspectorate, providing the inspectorate with a degree of explanation that otherwise may not be available to them. Additional pertinent information is also likely to be available by the time of the oral part of the examination which we have been denied access to from the County Council but may by then have received. This will be enable us to present the fullest and most accurate information for the inspectorate. We may also be representing some of our neighbouring residents (tbc), a number of whom may not all be able to make their own presentations for various reasons of health, stress, lack of experience, etc.</p>			

Comment ID:	1222	Consultee Mr P T Gee	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127054	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	I am writing to register my objections to the proposed planning scheme on the Netherhampton Road, Harnham, Salisbury. Firstly, one has to look at the infrastructure, with regards to services, doctors surgeries etc, plus the local hospital is already at breaking point, with little or no funding for further expansion.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1223	Consultee Mr P T Gee	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127054		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Secondly, I ask whether the planning authorities have given due consideration to the amount of houses that have already been built in the Salisbury and surrounding areas. There has been in the last few years well over a thousand houses built in the Salisbury area, with a further 700 at least over the next few years. Plus, the extension of Tidworth, 400 more at Larkhill, more at Old Sarum, more on The Avenue at Wilton and even more at Fugglestone. This places an unknown pressure on road already at bursting point.</p> <p>Has there been at any time a point where thought has been given to taking stock of the road systems already at breaking point before continuing this madcap dash to build a further 600 plus houses, plus a 480 place school adding further problems to an area that cannot cope.</p> <p>Salisbury as a city, has a low unemployment rate, and as these new houses, very few of which will be social housing, will result in more cars on roads as people drive to find work.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1224	Consultee Mr P T Gee	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127054	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This area was, I believe, already a site planning for 1100 houses, which was turned down. The site designated for industrial premises will, we all know, not happen, but, will over time, revert to house planning, with the resulting 400 or so built via back door planning. It is, in my opinion, lunacy to think of building more houses on this site, or any other in this area. I therefore ask the planning authority to withdraw the proposed plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1225	Consultee Ms Vivien Birch Person ID: 1127022	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Whole document				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I live on the boundary between North Bradley and Southwick parishes; although I would be affected (e.g. by traffic) if any of the developments in these parishes are made, only the edge of one might be within sight of my property. I have no financial, sentimental or nostalgic connection to the sites under consideration and no connection to landowners or developers. My interest is that I believe that North Bradley village would be harmed by development of two of the proposed areas, also that the development of another area has the potential to harm Southwick village. Farming is not thriving at the moment, and farming land adjacent to residential areas has additional problems. I can understand the attraction to a landowner of taking a developer's offer to purchase such land. Also, I sympathise with those struggling to get on the housing ladder, because of the lack of suitable housing. I do not know whether they want or need to live in the areas under consideration; neither do I know whether developers would choose to build sufficient numbers of the types of housing in these areas to meet needs, rather than the wish to return what developers consider an acceptable level of profit. I do not have confidence that the planning system is able to control this sufficiently well. See attached				
Attached files (Please see Objective)	4712576				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1226	Consultee Mrs Helen Clemow Person ID: 1125160	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H.3				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am also concerned about the lack of infrastructure in place to cope with 840 new homes. There are insufficient primary and secondary school places, cycle and bus routes, health services, and food outlets to cope with such a huge increase in households. As an employee at Salisbury District Hospital, I am worried about the impact heavy traffic levels will have on patient safety as ambulances and patients struggle to get through heavy traffic. Linked to this is the increase in air pollution levels at a time when more and more scientific papers are being published demonstrating the harmful effects traffic omissions have on health. The Royal College of Physicians estimates that air pollution shortens the lives of between 29,000-40,000 people each year in the UK. Only smoking contributes to more early deaths. [Royal College of Physicians (2016) Every breath we take: the lifelong impact of air pollution. Report of a working party. London: RCPs] The pollution levels on numerous roads in the Salisbury area already exceed European Union targets, to add to this seems criminal. Produce a new transport strategy for the city taking into account the latest research on the harmful effects of exhaust fumes on public health, along with the desperate need for most people to take more exercise, and where possible cycle or walk to work/school.				
Attached files (Please see Objective)	4712601				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1227	Consultee Mrs Harvey Select one	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 549589		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		263 297 (sites)		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Sites 263 and 297 have now been allocated to housing remove sites from the allocation plan these sites should not be used for housing			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1228	Consultee Mr Dean Berry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1127957		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I wish to object to the proposed development of 40 high-density housing on site 321 on the western edge of Bratton. The basis of this objection is that your allocation plan contains inaccuracies (i.e. you have overstated the existing size of the village by a staggering 307 houses), it draws the wrong conclusions from the data (both accurate and inaccurate data). It appears to have been compiled with almost no regard for the actual situation or consideration of the factors. My key objections are: 1) Significant additional traffic on an already busy and dangerous road (B3098 Westbury Road) Other sites more suitable, with greater need and much less adverse impact, can and should be found			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1229	Consultee Mr Peter Brabner Person ID: 705001	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.59 SBR Bratton				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Bratton is a village, and its characteristics need be preserved as such. 6.4 states that it is the prerogative of local communities to review Settlement Boundaries through neighbourhood planning. Bratton has thus far not yet been able to prepare and adopt a Neighbourhood Plan. However, Bratton Parish Council has resolved to object to any change to the settlement boundary for the village (with one minor exception), there being no adequate reasons to amend the current boundary. I fully support this view – there is no need to change it. There are a number of houses outside the current settlement boundary, and that presents no issues for the village; indeed, it does mean there can be no ‘presumption of planning approval’ within such areas, which might otherwise be construed. Any change to the settlement boundary would have an adverse effect on the conservation area and aspects of the village. Leave the Settlement Boundary for Bratton as it is, except for the minor amendment proposed by the Parish Council. Then leave the Parish Council to prepare and adopt its own Neighbourhood Plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1230	Consultee Mrs Jean Broome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126182		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Hilperton Gap		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not consistent with national policy because the council does not properly consider brown field sites. They should consider the number of derelict sites in Trowbridge which could be used to create new homes instead of using Hilperton Gap. There is no way to make this draft plan sound. Therefore I would recommend abandoning this unsound plan and start a new plan to utilize brown field sites that are practical, suitable for purpose and provide the required housing (not more housing than is necessary as is being proposed) without destroying valuable open countryside.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1231	Consultee Mrs Jean Broome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126182		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Hilperton Gap			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Trowbridge community want to maintain open spaces for the wellbeing of its population and especially to keep Hilperton a separate community from Trowbridge to maintain its identity. There is no way to make this draft plan sound. Therefore I would recommend abandoning this unsound plan and start a new plan to utilize brown field sites that are practical, suitable for purpose and provide the required housing (not more housing than is necessary as is being proposed) without destroying valuable open countryside.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1232	Consultee Miss Sarah Lowe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126962		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My family and I do not believe the Wiltshire Housing Site Allocations Plan is justified or effective because of the following points:</p> <p>1) H2.2 Land off of the A363 at White Horse Business Park, Trowbridge will add even more traffic to an already ridiculously congested area, and no suggestion for improvement has been put forward. At certain times of the day, Bradley Road and Yarnbrook are just large traffic jams, adding 150 more houses (with potential of 150 to 600 more cars) will cause constant gridlock. Not to mention the increase in air pollution and noise pollution.</p> <p>Don't build on site H2.2!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1233	Consultee Ms Rachel Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1102653	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the 2017 HRA made yesterday clearly states that:</p> <p>Recommendations on page 76 specifically relate to 1021 and state.</p> <p>'Recommendations (continued)</p> <p>Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Boundary hedgerows / tree lines • Lambrok Stream <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats.</p> <p>This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal. Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Because the council has not researched the background of site 1021 sufficiently to make an informed decision				

Comment ID:	1234	Consultee Mrs Mary Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125482		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>H3.3 is on the flood plain of the river Nadder and has a boundary on a housing area already liable to flooding despite 2008 flood protection reinforcements.</p> <p>The size of the development of H3.1 on the hilly higher ground across the road will impact on the valley water table of H3.3. I do not believe that the Environment Agency could have been properly consulted and agree to such developments. I would like to see the report of the Environment Agency and their views on mitigating the flood risks at H3.1 and H3.3. I understand that housing development on a floodplain or in areas liable to flooding can only be considered if there are no other sites suitable for development.</p> <p>I see no reference to exploring further development on the north side of the city at Old Sarum where there is no flood risk. We need more housing in Wiltshire but I note that H3.1 and H3.3 developments total far more houses than is being considered for any housing development elsewhere in Wiltshire so this is not justified.</p> <p>I see no considerations of other sites for housing development in Salisbury eg at Old Sarum, or brownfield sites at Churchfields, at the Maltings. The Environment Agency has already assessed the flood risk at the latter 2.</p> <p>I do not agree that there is employment or that this can be created in Salisbury on the south side of the city. Thus the residents of the developments will need to commute to the north of Salisbury or to Southampton adding to the traffic saturation already present on the Netherhampton Rd. The Salisbury transport plan has not delivered improvements to date on this.</p> <p>The plans for H3.3 and H3.1 cannot be justified until there is clear reporting from the Environment Agency on these being the preferable sites in Salisbury for housing development.</p> <p>Highways for England needs to report on the traffic implications so that Salisbury Transport Plan can be re-examined. Traffic on the Netherhampton Rd approach to the Harnham Gyroty has increased hugely in 23yrs and is often gridlocked at peak times, and on market Tuesday when the livestock market on the road is operational, and during Salisbury races. Additional cars from new homes will add to this morning and evening as people head to work most of which is to the north of the City. Salisbury Transport Strategy has not delivered a solution to these problems to date and review and consultation with the Highways Agency must surely happen BEFORE hundreds of new homes add to the traffic.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I would like the planning inspectors to understand my views properly.				

Comment ID:	1235	Consultee Mrs Mary Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1125482		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>H3.3 is on the flood plain of the river Nadder and has a boundary on a housing area already liable to flooding despite 2008 flood protection reinforcements.</p> <p>The size of the development of H3.1 on the hilly higher ground across the road will impact on the valley water table of H3.3. I do not believe that the Environment Agency could have been properly consulted and agree to such developments. I would like to see the report of the Environment Agency and their views on mitigating the flood risks at H3.1 and H3.3. I understand that housing development on a floodplain or in areas liable to flooding can only be considered if there are no other sites suitable for development.</p> <p>I see no reference to exploring further development on the north side of the city at Old Sarum where there is no flood risk. We need more housing in Wiltshire but I note that H3.1 and H3.3 developments total far more houses than is being considered for any housing development elsewhere in Wiltshire so this is not justified.</p> <p>I see no considerations of other sites for housing development in Salisbury eg at Old Sarum, or brownfield sites at Churchfields, at the Maltings. The Environment Agency has already assessed the flood risk at the latter 2.</p> <p>I do not agree that there is employment or that this can be created in Salisbury on the south side of the city. Thus the residents of the developments will need to commute to the north of Salisbury or to Southampton adding to the traffic saturation already present on the Nethampton Rd. The Salisbury transport plan has not delivered improvements to date on this.</p> <p>The plans for H3.3 and H3.1 cannot be justified until there is clear reporting from the Environment Agency on these being the preferable sites in Salisbury for housing development.</p> <p>Highways for England needs to report on the traffic implications so that Salisbury Transport Plan can be re-examined.</p> <p>Thirdly, there are wonderful views of Salisbury Cathedral from the South West approach to Salisbury and its downland landscape which will be lost with the developments on H3.3 and H3.1. Your planning proposals state that there will be 'highly adverse impact on the landscape and highly important views', and 'the chances of mitigating these are low'.</p> <p>Surely this cannot be acceptable to either Natural England or to Historic England if they have been properly consulted?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I would like the planning inspectors to understand my views properly.				

Comment ID:	1236	Consultee A D Wood	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127967	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Re 2. Pollution As the A3094 is the main route serving the Harnham infants and primary schools, the air pollution levels are sure to increase proportionally with the increase in traffic. Cars using diesel fuel and planned to be removed in the future but no mention of lorries. Noise levels are sure to increase with an increase in traffic. I assume that an analysis for these elements will be part of the proposals.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1237	Consultee A D Wood	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127967	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Re 3. Flood risk I understand that the Environment Agency have designated the proposed area of development on the Netherhampton Road to be a low risk for flooding and a medium risk for surface water. Will these risks be readdressed as part of these proposals?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1238	Consultee A D Wood	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127967	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re 4. Sewage and surface water drainage</p> <p>I assume another analyses will or has been carried out as part of these proposals to ensure that the existing infrastructure for these elements can cope with the new developments.</p> <p>Can you please send me a written acknowledgement of this letter.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1239	Consultee A D Wood	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127967	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re: Wiltshire Housing Site Allocations Plan which includes the following proposals for the Salisbury area:</p> <p>640 houses – Netherhampton Road (south) near the cattle market 100 houses – Netherhampton Road (north) at Waldron’s Farm 100 houses just south of Woodbury Rise, Rowbarrow</p> <p>As a resident of West Harnham for more than 50 years, I must object to these proposals based on the following: Traffic Pollution Flood risk Sewage and surface water drainage</p> <p>Re 1. Traffic The Netherhampton and Harnham Road was originally designated as a Class B road before being upgraded to an A Class road (A3094) with little or no physical change except for a significant increase in traffic volume and very little or no enforcement of speed restrictions, resulting in fatalities and damage to property along the Netherhampton / Harnham Road caused by motor vehicles. The Salisbury bypass proposal for this area was supposed to reduce traffic along this route and now 840 new houses are proposed! Will a bypass be once again be considered as part of these proposals? The existing road network in this area cannot cope with the existing traffic as highlighted during the recent works on Newbridge Road, a main arterial road leading into Salisbury and its ring road, fed by the Harnham gyratory. The construction of these new homes would be disastrous for traffic in this area. The Netherhampton / Harnham Road is also a main route for emergency vehicles to and from the Salisbury District Hospital. Has or will a road traffic analysis been carried out as part of these proposals?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1240	Consultee Mr John Gauld	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126300	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Netherhampton Road and Harnham generally seem to have been selected to bear a disproportionate share of the housing burden imposed on Wilts. Council.</p> <p>3.As a large proportion of the increased employment in Salisbury is likely to be North of the city, it seems perverse to site so much additional housing to the South.</p> <p>2. A substantial reduction in the proposed number of dwellings in the Harnham/Netherhampton Road area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1241	Consultee Mrs Lisa Paul Person ID: 1127015	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A363 White Horse Park Reference 298, Elm Grove Farm 613/248		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I cannot comment on the legality of the proposal as I am not suitably qualified and I would hope that council lawyers would have advised accordingly. The Wiltshire Core Strategy documentation states that "the villages surrounding Trowbridge have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities". The documentation provided which details the proposed development shows that in the North Bradley area alone potentially between 569 and 350 houses are due to be built and whilst these are classed as being in Trowbridge, ultimately this proposal would join North Bradley to Trowbridge and remove any village status that it currently has. Our current road infrastructure is overstretched due to the amount of building work which is already taking place around Trowbridge, leaving our roads grid locked regularly especially with heavy goods vehicles, any further building will put more strain on our roads and services.</p> <p>The Wiltshire Core Strategy also talks about the regeneration of Trowbridge itself and identifies that there are areas which could be further developed to provide the much needed housing required, which may reduce the need for such a large proposal within the rural areas. Not only would this regeneration of existing sites benefit the town as a whole, it would lessen the burden on the surrounding villages and make Trowbridge a much more appealing area to live and work. These town areas should be looked at in more depth before resorting to the "easy" option of building on Green Land sites.</p> <p>Whilst I understand that there is a housing crisis and that all areas must "do their bit" to assist, I would not support any proposals that would cause the village of North Bradley to be lost forever and become another suburb of Trowbridge itself. More engagement is needed as even the Parish Council has not done enough to encourage discussion and provide the required information to the residents that this proposal is going to drastically affect. This information has been all but "hidden" in reams of documentation that most people would be daunted by and the council left it so late to engage with the local population that even they believe it is a "done deal"!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1242	Consultee Corsham LVA LLP	Agent Mr Matthew McShane Land Value Alliances LLP	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 836280	Person ID: 835942	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		All.		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation is submitted by LVA in respect of their land to the north of Bradford Road, Corsham. We wish to raise observations concerning potential housing allocations within the Plan.</p> <p>LVA consider that Wiltshire Council should allocate further sites than those proposed within the draft Plan to ensure there is flexibility in the land supply to meet future housing requirements.</p> <p>[representation promoting land at Corsham as an alternative allocation]</p> <p>LVA consider that land to the north of Bradford Road, Corsham should be allocated for housing within the Plan. The site is available, developable, technically viable and more importantly deliverable.</p> <p>The site has previously been promoted during the earlier stages of the Wiltshire Housing Site Allocations Plan process. Notably the site has been assessed by the Council and featured as a Refined Option for housing within the Informal Consultation on initial site options which took place February to March 2015. The land is identified within Refined Option 5: Site 3250.</p> <p>LVA believes the allocation of smaller sized non-strategic sites such as land to the north of Bradford Road, Corsham can make a vital contribution to land supply.</p> <p>A site of this size and nature, which has been subject to assessment and found developable, can provide the Local Authority with significantly more certainty and clarity in terms of housing delivery and completion rates as opposed to larger scale strategic sites which can often spend long periods of time within the planning process due to a wide variety of factors.</p> <p>Sites such as land to the north of Bradford Road, Corsham are more readily available for development as, in this particular case, the site is within single ownership (LVA), will require less upfront infrastructure and can respond efficiently to various market demands. These factors allow the site to be easily delivered and make a definitive contribution towards the housing requirements of Corsham, the Housing Market Area and Wiltshire as a whole.</p> <p>The allocation of small sites in suitable locations around Market Towns such as Corsham will ensure that required levels of growth are delivered in the plan period whilst providing flexibility and certainty in the event that the strategic sites do not come forward as expected.</p>				
Attached files (Please see Objective)	4712658				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1243	Consultee Ms Nicola Morris Person ID: 1122130	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraph 2.7 and Paragraph 2.15 and Table of levels of development Table 2.2, and Paragraph 4.4 (all related)		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>a)The WHSA Plan is a development document drawn up under the Wiltshire Core Strategy (WCS), and it must follow its strategy. WCS paragraph 4.7 states that if a development proposal does not accord with the WCS then "it is deemed unsustainable and will not be supported" (direct quote).</p> <p>b)This point is raised in relation to Paragraph 2.15 of the Plan and the information in Table 2.2. which does not conform with WCS Core Policy 1. The purpose of the WHSA Plan is to allocate housing and review settlement boundaries where necessary, It is a development of the Core Strategy, a further stage. It can not revise the Core Strategy or set out the wording of the Core Strategy differently.</p> <p>c) The wording in the "box" in Table 2.2 of the Plan on Large Villages is wrong in a significant respect. Core Policy 1 provides that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve EMPLOYMENT opportunities, services and facilities".</p> <p>d)BUT the wording in Table 2.2 states "... help meet housing needs of settlements and to improve HOUSING opportunities, services and facilities". The error is significant. The public consultation will NOT extend to considering EMPLOYMENT and instead the phrase mentions HOUSING twice. To emphasise: no coverage on one important aspect of employment and double emphasis on HOUSING at Large Villages. This needs correcting immediately. It is a fundamental flaw. Firstly, it may mean that the methodology of assessing the individual Housing Market Areas may have been weighed up using the wrong definition and incorrect key framework. This must be unsound. Secondly, it means that the public when weighing up the proposals in the Plan will not have been aware of the need to consider the importance of providing employment opportunities when considering the scheme as a whole or when considering individual sites. This goes to the crux of the consultation process for the public when considering development in Large Villages.</p> <p>e) To compound it, the ERROR is carried over to the all-important SITE SELECTION AND PROCESS METHODOLOGY and Topic Paper 2 (June 2017) paragraph 1.12 refers to Core Policy 1 but Table 1 beneath this sets out that the level of development for "Large Villages" should be "... that need[ed] to help meet the housing needs of settlements and improve HOUSING opportunities, services and facilities". This repeats the error. It may well be that the instructions to civil servants was clear and correct, and that despite the two errors they were still aware of the need to weigh up employment opportunities. Even if this is the case, the double error means that the public will be even less likely to be aware of the employment issue and reading other documents in the Plan papers such as this Topic Paper 2 would mislead them further and reinforce the wrong policy.</p> <p>f) This is particularly relevant to Bratton in the Westbury C.A.R. Site 321 allocates approximately 40 houses to this Large Village. Yet the likelihood of there being a small yet alone a modest opportunity for employment in the village must be very low. Bratton residents in particular will have been misled by the Plan into thinking that they must just deal with housing "needs" and housing "opportunities", quite oblivious of the need for employment opportunities. It will mean that people against the Plan may not have considered that a comment was worthwhile as it removed an issue which is important to the public.</p>			

g) There is a further conflict between the Plan and the WCS. The WCS states at Paragraph 4.15 "At Large Villages ...development will predominately take the form of small housing and employment sites within settlement boundaries.....Small housing sites are defined as sites involving fewer than 10 dwellings (ie not a major application).....Development outside the settlement will be strictly controlled. Relaxation of boundaries will only be supported.....identify new developable land to help meet the housing and employment needs OF THAT COMMUNITY....."

h) However, the WHSA Plan omits the reference to small housing sites or to fewer than ten houses, and this should be clear in the Plan. This is a significant omission. At Parag 4.4 of the Plan, it states: "The WCS proposes much more modest levels of housing at Large Villages as reflected in the indicative scales of housing for each community area." "Modest" is not the same as "Small". At 2.15 of the Plan it is set out that at Local Service Centres there will be "modest levels of development to safeguard their role and deliver affordable housing". Bearing in mind the hierarchy of development areas from Principal Towns down to Small Villages or undesignated areas, it can not be right that the the Plan is setting out "modest" housing more appropriate in size for a Local Service Centre, when the WCS states "small housing " for Large Villages. Only after it became clear that many of the sites which were "entered" following the calling in of sites process were in the Large Villages did the process expand to consider Large Villages.

i) A further flaw follows directly from this which makes the process unsound. The Plan disaggregates the number of houses required as a whole between now and 2026 between the various HMAs. The overall methodology of disaggregating houses over the HMAs and setting a fixed number is flawed for an area such as the Westbury Community Area Remainder. Here the indicative number of houses required is 47. This might be appropriate for the other HMAs where each Market Town has several Large Villages and may also have Local Service Centres. But it is fallacious for a small rural area such as the Westbury CAR where the number of villages is few running along the edge of the Plain escarpment apart from Dilton Marsh to the west of Westbury. (Westbury Leigh has already been taken in to the Westbury town area.) In an area where one Large Village Dilton Marsh can not apparently accommodate any housing because the school has no space, it means that all the housing must be allocated to Bratton. Edington is a Small Village and so takes no allocated housing. Result: Bratton must take all 47 houses or the Council can not prove that it has met its 5 year plan. This means that the proposed development in Bratton has changed from a possible 10 houses in 2015 to 47 today. This is above modest. The allocation includes affordable housing, which the WCS has set out is part of the role of a Local Service Centre. This process is clearly not "Plan-led". It is simply 47 houses into one place despite all key policies on a County level and without taking in to account all considerations on the local level. This can not be sound method, planning or policy. The Plan is then put out to consultation and there is no choice about where the house are placed. It negates the value of all the Site assessments and valuations.

The Bratton Parish Council did complete a questionnaire on the question of sites in Summer 2015. However as at that time the WCS (adopted 2015) was clear that "small housing" would be allocated to villages then the responses must have been made under a false impression. If the Parish Council had thought that a positive response of any sort would result in 40 houses then I believe the response would have been different. I believe the same may apply for the Housing Needs questionnaire. Very few responded, which on its own may make the result unreliable. However if the respondents had know that if they answered yes in favour of 8 houses, that they would get 40 - then again I believe the responses would have been different.

j) The division between some of the Market Towns and the adjacent villages is not logical. In the Westbury CAR it means that housing on the east side of Westbury outside of the settlement boundary is rejected out of hand. The recent application for 47 houses has now gone to appeal following a refusal. Yet this site is only 2 miles from Bratton and the sites are not considered as a cogent whole. Clearly, a site in Westbury has advantages over Bratton - it is a cheaper place to buy and to rent, the land values are lower, the town has multiple primary schools and Matravers as its secondary school, residents can walk in to the town (where as Bratton residents have to use a car or cycle or walk on a dangerous road, or rely on the bus to Westbury, with increased "out commuting"), it has a railway station so commuting for work and travel is easier than from Bratton, Westbury can accommodate larger numbers, it has a large employment estate to give employment opportunities, Westbury needs the growth to assist its own development. The list is long. Yet through the Plan there is no logical way of dealing with Westbury and its villages together as the Villages are separated into the Westbury CAR and must be dealt with separately. The result is that a large number such as 47 houses have to be accommodated in a village before 2026, with a potential for 40 almost immediately. Small developments are appropriate in Bratton, but not large ones suitable for the urban environment.

k) It is worth emphasising that the policy states that the development must benefit the particular community, and not the whole area, to quote: "Development outside the settlement boundary will be strictly controlled. Relaxation of boundaries will only be supported.....identify new

developable land to help meet the housing and employment needs OF THAT COMMUNITY.....", that is where the houses are in Bratton this should be for the benefit of Bratton.

l) A housing needs survey was carried out at Bratton and this identified a need for 8 houses. Under the process, 40 are allocated to Bratton.

m)The methodology for Site 321 assessed that the correct number for the Site was 32 houses, but this is increased to approximately 40 in order to mitigate for the adverse effects the estate will cause. But such an arbitrary increase ignores the other vital concerns such as number of cars, parking issues, highway safety, the increase in numbers out-commuting, the lack of infrastructure at Bratton, the capacity of the local GP surgery. It ignores the harm that a larger estate causes in an Area of Special Landscape Area.no) The assessment carried out for the SHLAA site 321 records the area as peaceful, but this is not the view of local residents who have to deal with the traffic on the narrow B3098, especially at rush hour

(n) In Paragraph 2.7 it is stated that the Core Policy 1 of the Core Strategy identifies FIVE (5) types of settlement and sets out "Large Villages" and "Small Villages" as two separate entities. This is wrong, incorrect and misleading. The Core Strategy identifies FOUR (4) categories. Large and Small Villages are categorised together. The difference between the two is that one has a "limited range" of services, facilities and employment and the other has a "low" level of services and facilities and "few" employment opportunities, but all are villages. Further, the Core Strategy sets out the development at Large and Small Villages as a single category, both treated together and the same, namely, development will be "limited to that needed to help the housing needs of settlements and to improve employment opportunities, services and facilities".

(o) The "Boxes" in Table 2.2 of the Plan for "Large Villages and Small Villages" have been separated contrary to the designation in Core Policy 1. The omission will mislead the public further to the above as the link provided by Core Policy 1 between Large & Small Villages is broken and lost.

(p) The wording in the "Box" in Table 2.2 for Small Villages does not conform to Core Policy 1 as the wording is wholly different. Firstly, the wording should be in the same terms as for Large Villages, (see above), as in the Core Strategy. Secondly, the wording in the "box" for Small Villages has been taken from the Core Strategy paragraph 4.16 but then amended. Paragraph 4.16 of the Core Strategy actually states that "some VERY modest development may be appropriate at Small Villages....", (rather than modest) and it does not say that this must be restricted to infill. Paragraph 2.1 misleads by stating that the table sets out the relationship ... and the expected level of development "UNDER Core Policy 1", when it does not.

q) It unreasonable to expect members of the public to consider earlier documents such as the precise wording of Core Policy 1 when considering the wording of the WHSA Plan which should be clear on the face of the document.

The corrections are recommendations are set out above with the comments

I repeat the paragraphs set out above.

The proposed corrections for the paragraphs above are clear from the contents.

These points are submitted by me in a personal capacity as a resident and parishioner in Bratton village.

This Representation is NOT made by me in my capacity as a Parish Councillor and NOT on behalf of Bratton Parish Council.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1244	Consultee Mrs Lesa Drewett Person ID: 1127962	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The existing infrastructure, predominantly the A3094, will simply not be able to sustain this new development of 840+ houses. This road is currently as breaking point already and serves as a poor excuse to an extension of the Salisbury ring road. Major conjection is evident at the Harnham gyratory and the Park Wall junction (going all the way down to the Wilton roundabout which is also overloaded now with extra housing in Wilton and on the A360).</p> <p>I live on the A3094 by the Quidhampton Lower Road junction and as Quidhampton is used as a 'rat run' to cut through to Churchfields Ind Estate and the city centre, this junction is extremely busy at peak traffic times. This year we have witnessed approx 1 accident a month at this junction with police and ambulance in attendance. If the A3094 is overloaded with yet more traffic the amount of accidents at this junction is only going to increase and it will only be a matter of time before we have a fatality (as they recently had at the other end of the A3094 in Harnham a few weeks ago). Is the Council willing to accept blood on their hands because they are forcing the housing on a truly unsuitable site?</p> <p>The Council cannot simply allocate this disproportionate amount of new housing to Netherhampton Parish just because a landowner has offered the land for sale. The location of land has to be correct in terms of infrastructure, this just seems to be a case of the Council panicking because they are not meeting their new housing quota.</p> <p>A new road network or bypass needs to be built before the Council can consider dumping these huge numbers of new housing in an already congested area. Through traffic has to taken away from the A3094 before any new housing can be considered.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Because I can give you some first hand evidence of the fragility of the A3094 and why it is already unsafe for the huge amounts of traffic it already serves.				

Comment ID:	1245	Consultee Mr Simon Hunt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1117600		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site 1021 Church Lane		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 1021 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Boundary hedgerows / tree lines • Lambrok Stream <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1246	Consultee Mrs Roz Walker Person ID: 1128189	Agent Mark Reynolds Person ID: 1124938	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A70 Sutton Veny settlement boundary		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>See attachments: Wiltshire Presubmission draft Housing Site allocations DPD - Representation - Land north of the Kennels, Sutton Veny PDF Appendix 1, Appendix 2 (part 1), Appendix 2 (part 2), Appendix 3 (part 1), Appendix 3 (part 2). This objection centres on the following parts of the document; 6. Settlement boundary review (and its supporting text) Table 6.2; Appendix A –Warminster Community Area, A.70 Sutton Veny proposals for revised settlement boundaries. Particular regard is focussed on Sutton Veny but the representation also questions the validity of the policy approach to the settlement boundary review as a whole, in terms of its wording and construct. This representation is structured to firstly consider the rationale underpinning the requirement for the settlement review before considering the housing supply position within the North West Housing Market Area (NW HMA) and the Warminster Community Area (WMCA). It goes on then to consider the methodology for the settlement boundary review before making the case for my Client's land in Sutton Veny to be included within the revised settlement boundary. An assessment of other development options within Sutton Veny is undertaken and thereafter the requested change to the WHSAP is outlined before concluding remarks are drawn. The WHSAP Topic Paper 1 Settlement Boundary Review Methodology noted at the draft methodology stage 'built and extant planning permissions' were to be included within the revised settlement boundaries. Following some objections to the draft methodology on the basis that not all sites with planning permission will be built out. The revised methodology was adopted which seeks to exclude unimplemented but extant planning permissions.</p> <p>The rationale for this alteration to the methodology is described at 7.14 of the Topic Paper 1 where it is concluded that 'the role of a settlement boundary is to define the built form of the settlement. Unimplemented planning permissions, by definition, have yet to be built and, therefore, do not form part of the built environment...therefore the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions'.</p> <p>This methodology is fundamentally flawed and fails to acknowledge the very purpose of settlement boundary review. The CS Inspector was very clear that settlement boundaries would need to be expanded to accommodate growth, indeed the CS was only found sound on the basis that this would happen in a timely fashion through the WHSAP. If settlement boundaries were intended to be utilised to only illustrate the existing form of a settlement they would have no value as a planning policy tool because they would not be proposing any development. The methodology underpinning the decision to exclude sites which have been granted planning permission is flawed and inconsistent with national policy which requires a DPD as part of a Local Plan to be positively prepared.</p>				

	<p>Settlement boundaries should be prepared to facilitate development coming forward. It is an important constituent part of the spatial expression of the plan making process. Settlement boundaries should offer both a recognition of the extent of the existing settlement but also the most appropriate spatial distribution of future development. Sites which have gained planning permission have been found to be compliant with the Development Plan or if not material considerations have indicated that they should be approved in any event. Either way they have been through the detailed Development Management process and been found to be acceptable. It is only then sensible that the plan making function of the Council should support the implementation of the sites which have already been found to be acceptable.</p> <p>See attachments Wiltshire Presubmission draft Housing Site allocations DPD - Representation - Land north of the Kennels, Sutton Veny PDF Appendix 1, Appendix 2 (part 1), Appendix 2 (part 2), Appendix 3 (part 1), Appendix 3 (part 2). The revised settlement boundary for Sutton Veny should be expanded to include my Client's land which benefits from planning permission under ref: 17/01776/FUL in full which is depicted at (Fig 1) and (Appendix 2). If this is not supported at the very least the existing part of the site which is in the existing settlement boundary should be retained within it. My Client's land as outlined in (Fig 1) and (Appendix 2) is being relied upon as a 'developable commitment' over the CS plan period but it is not proposed to be included within settlement boundary. This threatens the deliverability of a key site required to support meeting some of the unmet housing need within Sutton Veny. If WC are to rely upon sites such as my Clients to deliver housing over the plan period then planning policy needs to align with the housing trajectory to enable this otherwise the risk is that the permission will lapse and the housing supply could be lost. Given that sites with planning permission have already been determined to be acceptable for development there would be no disadvantage in including them within the revised settlement boundary which should be a tool to outline the future spatial distribution of development in the large villages. The permissions could after all be implemented at any point before they lapse thereby changing the extent of the built form of the settlement. In the context of a significant level of unmet need being identified within the WMCA it is critical that existing supply which the Council is reliant on is actually safeguarded for the length of the CS plan period. Failure to include my client's land within the settlement boundary could act to reduce the supply of housing which the Council is reliant upon. The examples of best practice in settlement boundary review cited by WC at Winchester, Purbeck and Kettering all include sites with planning permission within their settlement boundaries and the draft methodology for settlement review proposed this and in order to avoid undermining supply the methodology should be revised to include sites with planning permission within the revised boundaries. The housing shortage and lack of available supply to meet demand in Sutton Veny lend further significant weight to the land being included prior to examination of the WHSAP. See attachments Wiltshire Presubmission draft Housing Site allocations DPD - Representation - Land north of the Kennels, Sutton Veny PDF Appendix 1, Appendix 2 (part 1), Appendix 2 (part 2), Appendix 3 (part 1), Appendix 3 (part 2).</p>
Attached files (Please see Objective)	4713392 / 4713391 / 4713390 / 4713389 / 4713393 / 4713394
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In the event that the Council is unwilling to make the amendment sought through this representation it will be necessary to address the Inspector at the examination in public because the representation raises issues which question the soundness of the plan.

Comment ID:	1247	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>Following the publication of the Draft Housing Site Allocations Plan (the Plan), Durrington Town Council set up a Task Group to deliver its response about the Plan (specifically relating to Durrington) to Wiltshire Council. Throughout the 10 week consultation period the Task Group has discussed the Plan with Wiltshire Council Spatial Department representatives at the Consultation events, conducted its own survey within Durrington, conducted fact finding, reviewed the Plan and other Wiltshire Council documents and held a Public Meeting for its residents on the 17th of August. As a result of the Task Group's work, the Town Council sat an Extraordinary Meeting on the 12th of September to approve the following response in relation to the Plan.</p> <p>The Town Council believes that the Plan (specifically relating to Durrington) is unsound because it is not Positively Prepared, Justified or Effective based on the following evidence:</p> <p>Market Town versus Large Village</p> <p>The draft plan and Wiltshire Core Strategy list Durrington along with Bulford and Amesbury as a Market Town, based on geographical boundaries and obvious transportation links to Amesbury. It makes little mention of Larkhill, which is part of the Parish (Durrington and Larkhill). Durrington should be seen as the unique large village it is, no more linked to Amesbury than perhaps the smaller villages of Cholderton or Newton Tony. Durrington is currently self-contained and sustainable. The Plan and Wiltshire Core Strategy should therefore reflect Durrington as a Large Village, not the Market Town of Amesbury including Bulford and Durrington.</p> <p>SUSTAINABILITY</p> <p>Services</p> <p>The Town Council acknowledges that there may be a positive impact on local businesses in the village, this was highlighted in the recent survey it conducted and is recognised in the Plan. It does not however believe it could be any more sustainable than it already is. This is a statement that the</p> <p>Plan often quotes 'making Durrington more sustainable'. With a plethora of facilities; 3 x Mini Supermarkets (including a Post Office), 3 x Schools covering all age groups, along with pre-schools, 6 x Take Aways, Hairdressers and Barbers shops, 2 x Doctors Surgeries, a Chemist, a DIV shop, a Flower shop, a Carpet shop, a Petrol Station, 2 x MOT/Repairs garages, a Swimming Pool, Fitness Centre, Dance Studio and Vets. The only real service missing in the village is a Dentist, but with Dentists in Tidworth and Amesbury at capacity and not taking on new patients either</p>				

	<p>on the NHS or through Private Dental Providers any new residents would have to seek this service outside the immediate area.</p> <p>At present there are two doctors surgeries in the village, one of which will close in early 2019. Its patients will potentially be relocated to new facilities at Larkhill once they are built. We therefore see a reduced capacity within Durrington. There is a known issue with availability of pre-school places, where will the pre-school aged children of the additional service families along with those of the 60 new families go, particularly given insufficient places at Larkhill?</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1248	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6 Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Employment The Plan makes assumptions that 60 more homes will bring employment to the village to help make Durrington more sustainable. The Town Council does not believe that there is significant employment opportunities within the village, 60 more homes will not bring more employment. It will have the opposite effect and will likely increase the carbon footprint of the village with residents travelling outside of the village for employment, impacting more on the roads.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1249	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6 Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure</p> <p>The Plan allocates two sites for Durrington, both sites will negatively impact on the roads, parking and public safety in the village. The proposed 45 homes off Clover Lane are intended to be linked into the current road structure on Clover Lane through two access roads that were built during the original build phase of the Avon Fields development in 2012. These roads were built to link to an extra 15 homes where planning had been approved but not taken place. Notwithstanding the 15 homes for which planning has been granted, an additional 30 homes are now being planned</p> <p>This would bring into question the Design and Access Statement of Avon Fields which was for a total of 156 homes and whether the current access roads and road structure within the estate could sustain an additional 30 homes.</p> <p>The proposed 15 homes on Larkhill Road would be sited on a busy A road that already suffers from speeding vehicles, parking and congestion issues, as well as it being a rat run through to the A303. The Town Council does not believe that the site has the capacity for 15 homes in the building line as is consistent with the current line of permanent residences along this side of Larkhill Road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1250	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6 Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Army Rebasing – Larkhill</p> <p>The Core Strategy and Plan do not fully consider the impact of Army Rebasing in Larkhill on Durrington. Not only are in excess of 440 homes being built at Larkhill for service personnel and their families, but there will also be an increase in approximately 1500 single service personnel arriving in Larkhill. Given the facilities and services that Durrington has, the Town Council believes there will be a significant increase in traffic to and from Durrington. How can Wiltshire Council have thoroughly considered the potential impact of Army Rebasing on Durrington given there is little evidence or mention of it in the Plan? The Town Council believes a common sense approach should be adopted in relation to the development of the sites allocated in the Plan until post Army Re basing and the full impact on Durrington's infrastructure, self-containment and sustainability can be fully assessed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1251	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6 Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Roads An increase of 60 homes in Durrington plus Army Rebasing at Larkhill will have a detrimental impact on public safety, our roads and parking, which the Town Council believe to be at full capacity. This was the main concern of residents in the survey responses submitted and at the Public Meeting held. There is serious congestion in the village for high percentages of the day when navigating the narrow village streets. It is also potentially dangerous due to the levels of traffic including HGVs, buses, school pick up and drop off locations due to access issues at schools. The Town Council also foresees the impact of Army Rebasing as mentioned above on the village's roads.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1252	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6 Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Sewerage and Drainage Flash flooding is an issue in areas of the village, this is partly linked into the system being overburdened following years of the village's expansion. Could the current system cope?			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1253	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6 Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Conservation</p> <p>Durrington is unique in where it sits in Wiltshire and how it shares its tight boundary with Conservation areas, SSSIs, the River Avon and of course Salisbury Plain, there is therefore concern over how these areas will be affected through further development. Durrington is already acknowledged via the Wiltshire Council's Draft Open Spaces 2015-2026 document as being under resourced in recreational and open space. It is therefore important to protect the limited green space and woodland available in the village.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1254	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6 Durrington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Affordability The Town Council understands that there is a need for land supply and houses and that some of those houses need to be affordable (rent/purchase). The Wiltshire Housing Needs Survey of 2015 (page 13) states that given the annual median income in Wiltshire (£19,254 in 2013) it would be unlikely that a current Durrington resident wanting to buy or rent a home in Durrington would be able to afford to do so. This potentially means that any new homes built as part of the Plan in Durrington, whilst meeting Wiltshire Council quotas won't necessarily assist in getting those Durrington residents who want to buy or rent in the village a home to live in. This will result in more residents from outside of Durrington moving to live in Durrington, whilst Durrington residents wanting to buy or rent locally may have to move elsewhere to more affordable homes.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1255	Consultee Durrington Town Council Chair planning	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Durrington Town Council Person ID: 458507		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 and H3.6		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Boundary Settlement Review The Town Council objects to the expansion of the current settlement boundary to fulfil the Plan, overturning what was considered in the Salisbury District Local Plan a 'safe' plan. The village has positively contributed to conducting infill in line with its Village Design Statement recognised by Wiltshire Council. Over 40 infill developments have taken place in the past 5 years, in addition to the 140 homes built at Avon Fields. With the increase of 440 homes in Larkhill, the Parish will see a 34% increase in homes over an 8-10 year period, potentially making Durrington less sustainable. There is concern that once the settlement boundary is expanded to include new sites for development under the Plan the boundary will potentially be expanded again and again to include other sites outside the current and/or projected boundary post the delivery of the Plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1256	Consultee Major David Cummings	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445982	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Application Ref: 14/08321/0UT Outline planning for land at Harnham Business Park, Netherhampton Road, Harnham, Salisbury. I have studied these plans and would like to raise a number of objections for the following reasons. Point One. As I understand it, a sizeable proportion of the site in question is currently listed and scheduled for business use. The outline plan proposes housing. I submit that before consideration of these plans are contemplated, a request for change of use needs to be submitted and agreed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1257	Consultee Major David Cummings	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445982	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Point Two. Another concern is the ability of the current infrastructure to cope with the increased volumes of waste water, drainage and run off. The size of the development proposed would mean these volumes will be considerably greater, than that presently generated.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1258	Consultee Major David Cummings	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Point Three. Of further concern is the increased traffic flow that will be created as a result of this proposal. Traffic volume on the A3094 has noticeably increased in recent years, and there are already considerable queues of traffic at certain times of the day, particularly during peak traffic periods, at the Harnham Gyratory and at Quidhampton where the A3094 joins the A36 at Park Walls. A development, of the shear size contemplated, can only increase the size of the queues and their duration. I am are sure the residents of Harnham and Quidhampton, living alongside the A3094 will have similar concerns.</p> <p>Point Four. Netherhampton Village proper, is comprised of approximately 60 to 100 residential properties. This new proposal of 740 new houses on Netherhampton Road on the A3094 would mean the creation of a whole new town, approximately 7 and a half times of the existing Netherhampton Village! There is currently no infrastructure to support such a proposal. There is, however, an already inadequate road system that in the last 5 or so years has become the 'unofficial' Salisbury Ring Road. This is the current A3094.</p> <p>Point Five. One day, Salisbury will be allocated funding to build a proper 'bypass'. It has got to happen. Other towns and cities (with lesser claims) have already been granted funding. The present proposal to build 740 houses on the A3094 Netherhampton Road blocks, exactly, the route of the bypass that was considered fifteen years ago.</p> <p>Point Seven. When the firm 'In Excess' applied to move it's very small shop in Harnham to it's main warehouse one mile away on the A3094 towards Netherhampton Village, planning permission was refused for almost 10 years by Salisbury District Council, on the grounds that the increased traffic on the A3094 would result in the road being impassable.</p> <p>Point Eight. I note that minor changes were made to the South Wiltshire Core Strategy Submission Document submitted before the Initial Hearing Sessions. Page 161 of the Core Strategy (which covers the land area regarding this particular proposal) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". I can find no evidence that this has been carried out and, therefore, this proposal should not even be considered until such time as these measures have been carried out and agreed by all of those those in authority.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1259	Consultee Major David Cummings	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445982	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Point Six. When the Cattle Market was moved from the current Waitrose site in Salisbury, to it's current location on the A3094, assurances were given at the time, by the then Salisbury District Council, that no future infill between Harnham and Netherhampton would be permitted.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1260	Consultee Mr Stephen Harness Chartered Town Planner	Agent Mr Stephen Harness Chartered Town Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128216	Person ID: 1128221	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.29 Proposed amendments to the settlement boundary for Corsham			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consideration to be given to amending settlement boundaries in line with the attached representations. See attached suggested settlement boundary amendment.				
Attached files (Please see Objective)	4713563				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1261	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 site north of Netherhampton Road		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site is outside the Harnham Flood Defences and parts of the field have standing water after heavy rain . If it is developed it could lead to flooding elsewhere.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Possibly - to challenge the assumptions that have been made unless further detail of drainage and highway improvements are provided prior to the Examination .				

Comment ID:	1262	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 site north of Netherhampton Road		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site was the subject of an appeal for retail development in 1987-89. The decision referred to the significance of the western approach to the city along Netherhampton Road in appreciating the special setting of the cathedral amongst the watermeadows and the need to protect Salisbury's unique setting.</p> <p>This is still a valid consideration today, and the preservation of the important public views and setting of the cathedral is more difficult to achieve with a housing development than a supermarket owing to the greater density of ground cover. Three storey houses such as can be found on the Wellworthy estate opposite would cause an adverse impact as would large trees. The low density/low height housing scheme necessary to reduce the impact on the setting of Salisbury and preserve the open character of the views across to the watermeadows would not deliver the number of houses proposed. Landscaping of this site would require a different approach from current housing developments with a greater quantity of open space and no large tree species.</p> <p>Should this allocation go ahead it would be necessary for a height restriction to be imposed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Possibly - to challenge the assumptions that have been made unless further detail of drainage and highway improvements are provided prior to the Examination.				

Comment ID:	1263	Consultee Mrs Judith Howles	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1120809		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 site north of Netherhampton Road		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		The allocation represents a loss of productive agricultural land and a reduction in the gap between settlements along the river corridor that is important to landscape setting of Salisbury.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Possibly - to challenge the assumptions that have been made unless further detail of drainage and highway improvements are provided prior to the Examination .			

Comment ID:	1264	Consultee Mr Stephen Harness Chartered Town Planner	Agent Mr Stephen Harness Chartered Town Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128216	Person ID: 1128221	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.67 Proposed amendments to the settlement boundary for Tilshead			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consideration to be given to amending settlement boundaries in line with the attached representations.				
Attached files (Please see Objective)	4713559				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1265	Consultee Mr Stephen Harness Chartered Town Planner	Agent Mr Stephen Harness Chartered Town Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128216	Person ID: 1128221	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.58 Proposed amendments to the settlement boundary for Westbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consideration to be given to amending settlement boundaries in line with the attached representations.				
Attached files (Please see Objective)	4713604				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1266	Consultee Mrs Christine Bennett	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126268		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>H 3.4: The Rowbarrow site is situated in a sensitive area of archaeological interest and using this land might be a first step to infilling all the way along this route towards the District Hospital. Aesthetically, loss of green spaces and sites of special interest would be very unfortunate and such concretisation of a rural area would remove another green space for the community.</p> <p>H3.4 Rowbarrow Remove this option completely</p> <p>Overall, I can see that the authority is attempting to comply with government dictats, but I am unsure about the need for so many houses in the Salisbury area. Many new residents would have to commute elsewhere for work and this too would contribute to congested roads. Aesthetics also need to be considered. The removal of so much rural land and open spaces would be detrimental - in particular, altering the approach to Salisbury along Netherhampton Road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1267	Consultee Mrs Christine Bennett	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126268		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1,H3.3,H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am concerned about the long-term aim to move Churchfields industrial estate to the Harnham/Netherhampton area, as this would also contribute hugely to traffic congestion. Overall, I can see that the authority is attempting to comply with government dictats, but I am unsure about the need for so many houses in the Salisbury area. Many new residents would have to commute elsewhere for work and this too would contribute to congested roads. Aesthetics also need to be considered. The removal of so much rural land and open spaces would be detrimental - in particular,altering the approach to Salisbury along Netherhampton Road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1268	Consultee Mr Michael Dennis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128249	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This my objection to the Wiltshire Housing Site Allocation Plan for the period 2006 to 2026.</p> <p>Below is an extract from the Wiltshire Core Strategy regarding open country between the town and villages at paragraph 5.150 page 181."it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities."</p> <p>Developers are holding granted planning permission for over 5000 dwellings in Trowbridge which they are not building.</p> <p>On the basis that the Former District Council Offices, the East Wing site, the Virgin building, and the Bowyers site, (all Brownfield sites) have been specifically identified by Wiltshire Council to include housing they should all be included in the preferred sites list with minimal risk that they would not be delivered by 2026.</p> <p>Procedural anomalies relating to the process itself are rife. The indications being that this parcel of land has been added to the Proposal in a rushed manner without due diligence on its suitability having been performed. Furthermore all attempts to activate the commitments made by Councillors & County Officers have been met with negativity and inaction.</p> <p>There is no active support for this site from either, Local Council, Environment Agency, Natural England, Historic England or the County Planning Archaeologist despite such active support being voiced for other sites within the Proposal. In fact in a response from Natural England the case officer said :</p> <p>Conclusions/recommendations in the Trowbridge Community Area Topic Paper have noted that Site 3565 (Land east of the A361 at Southwick Court), is considered to be a less sustainable options for development, and that five moderate adverse effects have been identified in relation to this site."</p> <p>As NPPF demands: "If a planning application fails to score positively against the aims and objectives of the Local Plan Sustainability Appraisal or Local Plan policies planning permission should be refused."</p> <p>After considering all the comments/objections, from all sources, regarding this site, the Council should seriously consider removing Site 3565 (Southwick Court Fields) from the Wiltshire Housing Site Allocation Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1269	Consultee Mr Michael Dennis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128249	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site comprises of 2 large agricultural fields used for livestock grazing and informal recreation. Building here would result in permanent loss of agricultural land.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1270	Consultee Mr Michael Dennis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128249	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The land suffers from serious flooding already currently impacting severely on the built form around it. Any further water entering the drainage system (which is close to capacity) will exacerbate this and will break the Environment Agency 'Lifetime surety' to be free of flooding for at least 100 years for homes already existing.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1271	Consultee Mr Michael Dennis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128249	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Access to the potential site cannot be through the Important and protected hedgerow where the proposed access is on to Silver Street Lane, therefore access can only be from the A361 directly past the grade 11* listed building and across the Ladbroke Stream floodplain which bifurcates the site. This route is also not possible as it would have to break through the protected hedgerow.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1272	Consultee Mr Michael Dennis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128249	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In general terms the land is prone to holding surface water after prolonged rain. There is photographic evidence available which clearly illustrates the quantity of clay underlying the site, the high water table, and the innate inability of the geology to safely remove current surface water without the addition of additional surface run-off.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1273	Consultee Mr Michael Dennis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128249	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The problem with locating housing close to Southwick Court is that this is a roosting site for Bechstein bats and other protected species of bats associated with the Bath and Bradford on Avon Special Area of Conservation (SAC). The Bat Special Area of Conservation (SAC) Planning Guidance for Wiltshire was published by Wiltshire Council on 10th September 2015.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1274	Consultee Mr Michael Dennis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128249	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Southwick Court is a grade 11* listed building with many archeological remains in the adjacent fields. (fields that are proposed to be built on). Extremely rare post-medieval earthworks will be destroyed (earthworks which have already suffered damage from ill-informed exploratory work).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1275	Consultee Mr Anthony Hemmings	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131985		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.41 Semington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		1:K Settlement boundary to be moved to southern side of former railway embankment i.e. between 541 Outmarsh and the air ambulance property.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1276	Consultee Ms Deborah Lawrence Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Purton Parish Council Person ID: 1054962		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A47 Proposed amendments to the settlement boundary for Purton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Though we largely confirm the appropriateness of the proposed settlement boundary for Purton Parish, we would like one adjustment please for accuracy and to conform with our neighbourhood plan.</p> <p>1. Regarding College Farmyard, we request to retain the settlement boundary as it is in that area. The reason is that contrary to the consultation document where it says, “ Amend boundary to remove employment land at the edge of the large village.” this area has not been used for employment (farming) for decades and it is not designated as employment land in any Wiltshire Council document or in our neighbourhood plan.</p> <p>2. The proposed settlement boundary is shown passing through the middle of St Mary School (as shown on the map below) whereas it should skirt the southern boundary of the school including its car park to the east and the play area to the southeast.</p>			
Attached files (Please see Objective)		4713690			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1277	Consultee Mr Maurice Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126678		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a resident opposite Site 321 I was disappointed that we were not notified formally by Wiltshire Council that the consultation process had started and due to end on 22nd September 2017, I would suspect that many residents feel the same way and may still be unaware of the process. The application should be refused, the housing is not required or supportable. There is no requirement for such a large development in Bratton				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1278	Consultee Mr Maurice Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126678		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		As a resident opposite Site 321 I was disappointed that we were not notified formally by Wiltshire Council that the consultation process had started and due to end on 22nd September 2017, I would suspect that many residents feel the same way and may still be unaware of the process. The application should be refused, the housing is not required or supportable. The view from our houses opposite will be severely compromised, the statement that it will have minimal impact is untrue. The proposal could have a detrimental effect upon the value of our property			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1279	Consultee Mr Maurice Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126678		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a resident opposite Site 321 I was disappointed that we were not notified formally by Wiltshire Council that the consultation process had started and due to end on 22nd September 2017, I would suspect that many residents feel the same way and may still be unaware of the process.</p> <p>The proposal should be removed for the following reasons:</p> <p>The B3098 is far too busy to support any access to and from the Site, this was the reason for the development being refused permission in the past.</p> <p>Access will be unsafe and dangerous</p> <p>The application should be refused, the housing is not required or supportable.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1280	Consultee Mr Maurice Turner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126678		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a resident opposite Site 321 I was disappointed that we were not notified formally by Wiltshire Council that the consultation process had started and due to end on 22nd September 2017, I would suspect that many residents feel the same way and may still be unaware of the process. Negative effect upon the school and Doctors The application should be refused, the housing is not required or supportable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1281	Consultee Mr John Fullegar	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125498		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I do not believe the draft Wiltshire Housing site allocations plan is sound because: 3) Site H2.2 provides a Natural habitat for a large variety of wildlife as well providing natural space for dog walkers and joggers to use. Don't develop the site in question (H2.2 Land off of the A363 at White Horse Business Park, Trowbridge) instead look to develop existing brown field sites in Trowbridge.2 2) Whilst site H2.2 is only allocated for 150 houses at this time, due to the large size of the site, what measures would be taken to ensure these 150 houses were not built in a small area of the site, and further houses filling up the site at a later date?			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure points are clearly understood			

Comment ID:	1282	Consultee Mr John Fullegar	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125498		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I do not believe the draft Wiltshire Housing site allocations plan is sound because: 4) Extra demand for the local North Bradley Primary School will potentially impact on current residents, and prevent them from being able to go to school in the village. Don't develop the site in question (H2.2 Land off of the A363 at White Horse Business Park, Trowbridge) instead look to develop existing brown field sites in Trowbridge.2 2) Whilst site H2.2 is only allocated for 150 houses at this time, due to the large size of the site, what measures would be taken to ensure these 150 houses were not built in a small area of the site, and further houses filling up the site at a later date?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure points are clearly understood				

Comment ID:	1283	Consultee Mr John Fullegar	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125498		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I do not believe the draft Wiltshire Housing site allocations plan is sound because: 6) We should be looking to build on the many Brown sites already present in Trowbridge Town, not developing on green field village sites. Don't develop the site in question (H2.2 Land off of the A363 at White Horse Business Park, Trowbridge) instead look to develop existing brown field sites in Trowbridge. 2) Whilst site H2.2 is only allocated for 150 houses at this time, due to the large size of the site, what measures would be taken to ensure these 150 houses were not built in a small area of the site, and further houses filling up the site at a later date?			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure points are clearly understood			

Comment ID:	1284	Consultee Mr John Fullegar	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125498		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I do not believe the draft Wiltshire Housing site allocations plan is sound because: 7) Building on site H2.2 would bring additional Air pollution & Noise pollution to the village, especially as there is no easy access and many cars would be sat in traffic for long periods of time. Don't develop the site in question (H2.2 Land off of the A363 at White Horse Business Park, Trowbridge) instead look to develop existing brown field sites in Trowbridge.2 2) Whilst site H2.2 is only allocated for 150 houses at this time, due to the large size of the site, what measures would be taken to ensure these 150 houses were not built in a small area of the site, and further houses filling up the site at a later date?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure points are clearly understood				

Comment ID:	1285	Consultee Mr John Fullegar	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1125498		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I do not believe the draft Wiltshire Housing site allocations plan is sound because:</p> <p>8) Site H2.2 is regularly flooded, building on this site not only poses a flood risk to the new house built, but in reducing the area available for flood water to drain, will likely cause more flood problems for existing villagers.</p> <p>Don't develop the site in question (H2.2 Land off of the A363 at White Horse Business Park, Trowbridge) instead look to develop existing brown field sites in Trowbridge.</p> <p>2) Whilst site H2.2 is only allocated for 150 houses at this time, due to the large size of the site, what measures would be taken to ensure these 150 houses were not built in a small area of the site, and further houses filling up the site at a later date?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure points are clearly understood				

Comment ID:	1286	Consultee Sir / Madam Test Valley Borough Council	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 911081	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Settlement boundaries - Tidworth, Ludgershall, Bulford, Whiteparish, Winterslow			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Amended Settlement Boundaries</p> <p>It has been noted from the plan that the minimum housing requirement set out in the Wiltshire Core Policy for the East Wiltshire Housing Market Area is 5,940 dwellings along with 10,420 dwellings for the South Wiltshire Housing Market Area.</p> <p>The Council has identified a small number of the proposed settlement boundary amendments within the plan for settlements found in the East and South of the county . These amendments are for settlements within relatively close proximity to the border of Test Valley Borough. The sites in question have been listed below:</p> <p>Tidworth (East HMA) Ludgershall (East HMA) Bulford (South HMA) Whiteparish (South HMA) Winterslow (South HMA)</p> <p>Overall, after reviewing the maps of the amended settlement boundaries the Council would support the plan. However, we are aware that any future amendments to settlement boundaries close to the border of with Test Valley could possibly see increased pressure on housing requirements in the Borough alongside the additional pressures to transport infrastructure, open space and other services which would require further co-operation.</p> <p>In summary, in terms of housing, transport and infrastructure, there are cross boundary matters which we will continue to seek to liaise with you on, the Council welcomes the opportunity to continue to work together in the future.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1287	Consultee Sir / Madam Test Valley Borough Council	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 911081	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.1 Empress Way Ludgershall			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the above document and the supporting evidence base. The Council notes the plan covers 2 main topics of Housing Site Allocations and Amended Settlement Boundaries. The Council is mainly concerned with proposals by Wiltshire Council in the East and South Housing Market Areas, which are within close proximity to the border of Test Valley Borough Council.</p> <p>Housing Site Allocations The consultation document has identified 16.5ha of land at Empress Way, Ludgershall with a total possible development of approximately 270 dwellings. This includes 109 dwellings that have already been granted planning permission, (shown above in blue). In terms of figures this is the largest site that has been identified within the plan document. This site is approximately 350 meters from the border between Test Valley and Wiltshire.</p> <p>The Council welcomes the acknowledgement that a transport assessment will be needed to inform detailed measures to mitigate impacts on the local road network, including the nearby A342 Andover Road which directly connects the two authorities. Additionally it has been noted the requirement for significant additional screening at the southern and eastern site boundaries, along with landscaping and green infrastructure throughout the site as there are middle and long distance views of the site from the south from the direction of Test Valley.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1288	Consultee mrs victoria slater	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126692	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The massive run off from a development of this size would cause serious flooding in this area. Unless the above issues (in particular the matter of local roads) are fully addressed this proposal should not go ahead. And building on flood plain is short sighted and irresponsible.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1289	Consultee mrs victoria slater	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126692		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Netherhampton Road, Salisbury.</p> <p>Also this is an area of beauty, the first views to the cathedral from the Wilton Road. It will destroy the area. There is already an excess of dumping rubbish in local fields and on Harnham Slope, this will only increase.</p> <p>Unless the above issues (in particular the matter of local roads) are fully addressed this proposal should not go ahead.</p> <p>It will also destroy an area of great natural beauty and cause more noise, pollution, traffic jams and damage to the environment...as well as impacting visitors to Salisbury where traffic is already an issue. A development on this scale is horrendous in a beloved countryside area.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1290	Consultee Mrs Helen Norcott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126215		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 court orchard / castaway, Bratton figure 5.18		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site is inappropriate for the allocation of 40 dwellings as previously smaller developments have already been rejected on this site. Access to this site is very dangerous and will increase traffic on the B3098 and court lane, which are both narrow, blind in places and busy roads already.</p> <p>School children currently have to walk on the road as there are no pavements on court lane to crossover to Bury lane to access a safe route to school, an increase in traffic on court lane will make an already dangerous road to cross an accident hotspot. A development on this site will mean that any children accessing the primary school, park or local facilities will have to cross over at the top of court lane leading to the B3089 which currently has blind spots as you approach from both ways.</p> <p>Current services and amenities would be stretched offering no benefit to current resident or new .</p> <p>Other sites within the village boundaries need to be explored, and the size of any development be relevant to the needs of the village.</p>				
Attached files (Please see Objective)	4711925				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1291	Consultee Mr Christopher Demmery	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126711	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have also seen this area flood on numerous occasions after heavy rainfall has swelled Lambrok Stream.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1292	Consultee Miss Joanne Lee	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126216		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Hilperton Gap (HSAP reference 263/297) The Plan is not consistent with national policy because Wiltshire Council has failed to give proper weight to brown field sites. In Trowbridge town centre, there is the large derelict site of the old Bowyers factory which lies unused and an eyesore. It is the first thing seen from the railway station and sets the tone for the whole town. This could provide hundreds of homes and give the town a facelift at the same time. The fields of the Hilperton Gap are a green open space vital to and well used by the local community. Please reconsider this development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1293	Consultee Mike Credicott Person ID: 1128343	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Policy		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my concerns about the proposed allocation of an additional 40 houses to the village of Crudwell on the Ridgeway Farm site as detailed in the draft Site Allocations Plan.</p> <p>I, like many other people in the village, have in the past supported the introduction of new build housing projects as a means of sustaining the viability of the village. With the introduction of small estates every few years the character of the village has not been spoiled and the Conservation area has not been threatened. The centre of the village has been developed without spoiling the rural feel of the village.</p> <p>Back in 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same:</p> <p>The scale of the development - it was much larger than previous developments in the village.</p> <p>It was outside the designated red line settlement boundary and</p> <p>Its likely impact on the local infrastructure, specifically</p> <ul style="list-style-type: none"> the likely increased traffic on Tetbury Lane; the impacts on already overburdened drainage and sewerage systems and oversubscription of Crudwell Primary School. <p>I did, like many other parishioners, support the present development of 10 houses on the footprint of the old farm yard as it is certainly better than what was there before, it made good use of an existing "brown field" site and was of a scale consistent with other recent developments in the village.</p> <p>Against this backdrop, I was staggered to see the allocation of an additional 40 houses on this site which was previously deemed unsuitable.</p> <p>I also do not think that the allocation is justified when you look at your own guidance or notes within the Site allocations Plan. This states that housing sites will only be allocated where there is a strategic priority to do so. From the data available, the Site Allocation Plan currently results in an oversupply of some 4,300 dwellings to 2026 when you take into account past completions with deliverable commitments and windfall sites; even excluding windfall sites, the oversupply is still 2,200 across the housing market area. More specifically, the Site Allocations Plan results in an oversupply of homes in the Malmesbury Community Area; Wiltshire Council also has a history of oversupply of dwellings - in eight of the last ten years, more homes have been built than planned and over that period the over supply has been over 140% of target.</p> <p>On that basis there is no strategic need or justification to allocate new homes in Crudwell and the Draft Site Allocations Plan should not do so. I am also concerned that the site size / boundary of the Ridgeway Farm Development encompasses an area far greater than is required - even for 40 homes - so I question why that is the case and would like it reviewed.</p> <p>As there is no immediate strategic need for any housing allocations at Crudwell, I would much rather see the Neighbourhood Plan group consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very</p>				

	<p>busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward.</p> <p>Policy 1 of the Wiltshire Core Strategy notes that the "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", given that we have circa 250 homes in Crudwell, I do not see how an additional 40 homes on top of the 10 already being built - a staggering 20% increase overall - even falls within Wiltshire Councils own Core strategy.</p> <p>As I noted at the start of this email, I have watched this village grow over the last 27 years to the point now where we have a viable and thriving Pre-School Group, a thriving and excellent school, a fabulous Village Hall that we funded through community events that is without debt and thriving, we have an all weather sports facility, upgraded play area and outdoor gym! All this has added too, rather than detracted from, the character and feel of the village. This site allocation if allowed to stand would, in my opinion, completely change the character of the village and undo many years sensible and sensitive development supported by the Parish Council and the planning teams at Wiltshire Council. I am not anti-development but I do favour sensible, incremental development.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1294	Consultee Mike Credicott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128343		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Crudwell still has severe flooding problems which have not yet been completely addressed, it remains a major concern to people who live in properties around the Swillbrook which runs through the centre of the village. Many have experienced significant damage to their homes in recent years both through surface water and raw sewerage and I believe surface water from the proposed site would only make this situation worse. Many homes - including in The Butts estate where I live, already need non-return valves to stay safe from sewerage flooding until the excess over capacity subsides. I believe that sewerage frequently exudes from all the manhole covers at the end of Tuners Lane due to the lack of Pumping Station capacity, even during only moderate rainfall.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1295	Consultee Mike Credicott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128343		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Its likely impact on the local infrastructure, specifically the impacts on already overburdened drainage and sewerage systems and Crudwell still has severe flooding problems which have not yet been completely addressed, it remains a major concern to people who live in properties around the Swillbrook which runs through the centre of the village. Many have experienced significant damage to their homes in recent years both through surface water and raw sewerage and I believe surface water from the proposed site would only make this situation worse. Many homes - including in The Butts estate where I live, already need non-return valves to stay safe from sewerage flooding until the excess over capacity subsides. I believe that sewerage frequently exudes from all the manhole covers at the end of Tuners Lane due to the lack of Pumping Station capacity, even during only moderate rainfall.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1296	Consultee Mike Credicott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128343		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Back in 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same: Its likely impact on the local infrastructure, specifically the likely increased traffic on Tetbury Lane; I would much rather see the Neighbourhood Plan group consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1297	Consultee Mike Credicott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128343	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Back in 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same: Its likely impact on the local infrastructure, specifically oversubscription of Crudwell Primary School. I would much rather see the Neighbourhood Plan group consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. As I noted at the start of this email, I have watched this village grow over the last 27 years to the point now where we have a viable and thriving Pre-School Group, a thriving and excellent school, a fabulous Village Hall that we funded through community events that is without debt and thriving, we have an all weather sports facility, upgraded play area and outdoor gym! All this has added too, rather than detracted from, the character and feel of the village. This site allocation if allowed to stand would, in my opinion, completely change the character of the village and undo many years sensible and sensitive development supported by the Parish Council and the planning teams at Wiltshire Council. I am not anti-development but I do favour sensible, incremental development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1298	Consultee Mike Credicott Person ID: 1128343	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I, like many other people in the village, have in the past supported the introduction of new build housing projects as a means of sustaining the viability of the village. With the introduction of small estates every few years the character of the village has not been spoilt and the Conservation area has not been threatened. The centre of the village has been developed without spoiling the rural feel of the village. Back in 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same:</p> <p>The scale of the development - it was much larger than previous developments in the village. It was outside the designated red line settlement boundary and Its likely impact on the local infrastructure, specifically the likely increased traffic on Tetbury Lane; the impacts on already overburdened drainage and sewerage systems and oversubscription of Crudwell Primary School.</p> <p>I did, like many other parishioners, support the present development of 10 houses on the footprint of the old farm yard as it is certainly better than what was there before, it made good use of an existing "brown field" site and was of a scale consistent with other recent developments in the village.</p> <p>Against this backdrop, I was staggered to see the allocation of an additional 40 houses on this site which was previously deemed unsuitable. Policy 1 of the Wiltshire Core Strategy notes that the "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", given that we have circa 250 homes in Crudwell, I do not see how an additional 40 homes on top of the 10 already being built - a staggering 20% increase overall - even falls within Wiltshire Councils own Core strategy</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1299	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We wish to register our OBJECTIONS to the proposal to build 640 new houses on the flood plain, south of the Netherhampton Road, Salisbury, and 100 houses on the north side.</p> <p>TRAFFIC</p> <p>We live on Harnham Road and traffic is already a major problem - the road being used as a 'rat run' by traffic, including many heavy lorries, between the A30/A303 and roads south. This road becomes particularly clogged at 'rush hour times' with queues from the Harnham Gyratory backing up for half a mile; with resulting pollution and making it almost impossible to cross the road safely or to get our car out at those times. Traffic capacity in Harnham Road was assessed as at "maximum" capacity in 2011 (Atkins' Transport Strategy for Salisbury) and the volume of traffic has since increased. To add 740 house with, inevitably, at least 740 more cars seems irresponsible, to say the least.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1300	Consultee Mrs Alexandra Kate Hughes	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1128348		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.110 Yatton Keynell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 6: The soundness of the Wiltshire Housing Site Allocations Plan: Presubmission draft plan (the "Plan") Summary Paragraph 5.110 of the Plan states: "A woodland corridor along the western boundary [the "Woodland Corridor"] should be retained as a wildlife corridor ... Access would be taken from Farrell Fields and the possibility to link to adjacent footpaths should be explored" (own emphasis added). 2. I understand from attending Parish Council meetings over the summer of 2017 that there has been some uncertainty regarding the use of the Woodland Corridor. 3. In my opinion, unless the Woodland Corridor is retained, the Plan is not sound as if the Woodland Corridor is used for vehicle access this would cause irreversible damage to the environment, and most likely be contrary to national environmental and sustainability policies. The environmental importance of the Woodland Corridor 4. The Woodland Corridor: a) Lies very close to an Area of Outstanding Natural Beauty boundary. b) Has the single largest concentration of mature trees within the village and mature hedgerows running along both sides, which include a diverse range of native trees and plants. c) Provides an important nesting, feeding and breeding habitat for wildlife, including bats and owls (including potentially protected bats and barn owls). d) Provides habitat connectivity from the main village to the open countryside. 5. If the Woodland Corridor was to be used for vehicle access to the new housing development, I believe that all the trees and hedgerows along the Woodland Corridor would have to be removed to make room for a road. Such a loss of mature trees and hedgerows would be irreversible and have a severe adverse impact on wildlife. Further reasons for retaining the Woodland Corridor 6. In addition to the environmental importance of the Woodland Corridor, in my opinion it must not be used for vehicle access for the following reasons: a) It is too narrow (even if the trees and hedgerows were removed) for two lanes of traffic. b) Numerous roads and entrances already connect to the main road very close to the Woodland Corridor, including the school entrance (which is only metres away from the Woodland Corridor), Blacksmiths Close, Farrells Field, and a farm track opposite the Woodland Corridor. It would be very dangerous to have a further road connecting to the main road at this location. c) The Plan as currently drafted states that the Woodland Corridor should remain. Further, it expressly refers (elsewhere in the Plan and in supporting documents) to points of access. If the Woodland Corridor is in fact removed, this would give rise to legal issues as the Plan is progressing on the basis that the Woodland Corridor should be retained.</p>				

	<p>d) I understand from Parish Council meetings that it is uncertain who owns the Woodland Corridor. Therefore, there may be issues regarding ownership and legal entitlement to create a road.</p> <p>e) The main road at the point at which the Woodland Corridor meets it is already prone to flooding. If the Woodland Corridor was to be made into a road this would likely cause a flooding risk.</p> <p>Possibility of using the Woodland Corridor as a footpath</p> <p>I understand from the Parish Council that it is likely to assert that the Woodland Corridor should be used as a footpath. I would support this proposal, subject to the results of any sustainability studies and provided that any street lighting used is appropriate to avoid creating unnecessary disturbance to nocturnal wildlife.</p> <p>Paragraph 7: Suggested revised wording for the Plan.</p> <p>For the reasons stated in my response to paragraph 6, in my opinion paragraph 5.110 of the Plan should be amended as follows.</p> <p>The following words should be removed: "A woodland corridor along the western boundary should be retained as a wildlife corridor ...</p> <p>The replacement words should be as follows: "A woodland corridor along the western boundary must be retained as a wildlife corridor and must not be used for vehicle access" (changes shown in bold).</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1301	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLOODS You will know that a flood plain is an area liable to flood. The important function of a flood plain is that it is an area which will absorb excess rain water. Cover it with concrete and the water becomes a problem, flooding elsewhere.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1302	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>INFRASTRUCTURE We hear of no new infrastructure to be built - no green spaces, no shops or community centres. These houses will be for commuters to swell the traffic to and in the centre of Salisbury.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1303	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>AFFORDABLE HOUSING Developers seek to make their own high profits and will build houses affordable only by the well off but not really affordable by first time buyers. Salisbury has a need for smaller houses or flats for the young people and there are brown field sites in town which could take those, (hopefully with garage space underground).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1304	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>LOSS OF GOOD FARMING LAND It is hard to believe that there are 740 homeless families here. Houses in the new estates to the north of Salisbury are not all sold yet. The council is driven by central government demands for more building and also by the wish to make money from developers - but they should also be considering the quality of life for present residents.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1305	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We wish to register our OBJECTIONS to the proposal to build 640 new houses on the flood plain, south of the Netherhampton Road, Salisbury, and 100 houses on the north side.</p> <p>TRAFFIC</p> <p>We live on Harnham Road and traffic is already a major problem - the road being used as a 'rat run' by traffic, including many heavy lorries, between the A30/A303 and roads south. This road becomes particularly clogged at 'rush hour times' with queues from the Harnham Gyratory backing up for half a mile; with resulting pollution and making it almost impossible to cross the road safely or to get our car out at those times. Traffic capacity in Harnham Road was assessed as at "maximum" capacity in 2011 (Atkins' Transport Strategy for Salisbury) and the volume of traffic has since increased. To add 740 house with, inevitably, at least 740 more cars seems irresponsible, to say the least.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1306	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLOODS You will know that a flood plain is an area liable to flood. The important function of a flood plain is that it is an area which will absorb excess rain water. Cover it with concrete and the water becomes a problem, flooding elsewhere.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1307	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>INFRASTRUCTURE We hear of no new infrastructure to be built - no green spaces, no shops or community centres. These houses will be for commuters to swell the traffic to and in the centre of Salisbury.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1308	Consultee Canon Bruce Duncan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>AFFORDABLE HOUSING Developers seek to make their own high profits and will build houses affordable only by the well off but not really affordable by first time buyers. Salisbury has a need for smaller houses or flats for the young people and there are brown field sites in town which could take those, (hopefully with garage space underground).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1309	Consultee Canon Bruce Duncan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447657	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>LOSS OF GOOD FARMING LAND It is hard to believe that there are 740 homeless families here. Houses in the new estates to the north of Salisbury are not all sold yet. The council is driven by central government demands for more building and also by the wish to make money from developers - but they should also be considering the quality of life for present residents.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1310	Consultee Mr Adrian Rickett Person ID: 1128369	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.7 Land East of the Dene			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection. I feel that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector. Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers.</p>			
Attached files (Please see Objective)				
If your representation is seeking a change, do you consider it necessary to				

participate at the oral part of the examination?	
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Comment ID:	1311	Consultee Mrs Elaine Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126323		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 Netherhampton Road Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		2. Other infrastructure There are no firm details in the plan for additional shops, a doctors surgery, expansion of hospital facilities or improvements to the existing sewage pumping infrastructure which is already operating to capacity.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1312	Consultee Mrs Elaine Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126323		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 Netherhampton Road Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		3. Flooding The site on the north side of A3094 is well known locally for having standing water in winter and after heavy downpours. Development on the slope to the south side will cause a significant increase in run off water increasing the size of the flood plain and risk of flooding to a number of existing low lying properties.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1313	Consultee Mrs Elaine Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126323		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 Netherhampton Road Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		4. Loss of arable land and wildlife The development of this site is contrary to the National Planning Policy Framework which aims to protect high quality arable land by infilling brownfield sites instead. Anyone who has walked in this area knows the abundance of wildlife, plants and birds in the hedgerows that will be destroyed, as well as the unquantifiable unique view across the water meadows to the Cathedral spire which is a priceless asset to the city.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1314	Consultee Mrs Elaine Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126323		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 Netherhampton Road Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		5. Parish of Netherhampton This huge increase to the parish of Netherhampton is contrary to the National Housing Development Strategy of 'limited infill' within small villages.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1315	Consultee Mrs Elaine Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126323		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 H3.3 Netherhampton Road Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		6. Health Risks In addition to already mentioned traffic pollution there are two lines of high voltage electricity pylons adjacent to and crossing the south side site, causing possible health risks to residents. Studies have shown a statistical link between high electro magnetic fields and childhood leukaemia so this does not seem an ideal place to build a primary school.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1316	Consultee Laura Hutson Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Sport England Person ID: 1128412		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site allocations - playing pitches			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for consulting Sport England on the above named documents. Please find herein our formal comments for your consideration. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport. Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future. We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: http://www.sportengland.org/facilities-planning/planning-forsport/ Site allocations</p> <p>No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field (I have not identified any sites in the document where this would appear to be the case). http://www.sportengland.org/facilities-planning/tools-guidance/design-and-costguidance/other-design-guidance/</p> <p>Thank you once again for consulting Sport England.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1317	Consultee Mrs Gemma Gilham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 897270		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan is not justified because Wiltshire Council have not mentioned how schools, healthcare, roads, services and infrastructure will be provided to support such as huge expansion.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1318	Consultee Mrs Gemma Gilham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 897270		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan is not effective because the windfall of 60% of new housing is only detailed on one page and doesn't effectively support the required numbers.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1319	Consultee Mrs Gemma Gilham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 897270		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan is not consistent with national policy because Wiltshire Council have failed to list any brown field sites such as Bowyers and former West Wiltshire council site for consideration as per Wiltshire Council June 2017 Site selection methodology topic paper 2. It also goes against WCs policy to protect open countryside between the town and neighbouring villages and doesn't not protect the character and identity of Hilperton as a separate community.</p> <p>Considerations of Brownfield sites such as Bowyers and the previous Wiltshire Council site as well as Aston Park. Building on the gap will cause the loss of valuable recreational space for the East of Trowbridge and Hilperton.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1320	Consultee Mrs Gemma Gilham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 897270		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Existing houses are already at a high surface water flood risk along Wyke Rd and Haynes close, increased surface water from building on this land will only increase this risk.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1321	Consultee Mr Roger Coleman Semington Parish Council	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 396082	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.41 Proposed amendments to the settlement boundary for Semington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	At the Semington Parish Council meeting held on 20 September 2017 the Parish Council resolved to make the following comments: The Semington Settlement Boundary excludes the property at 14 The Knapps. This property should be included within the Settlement Boundary. Thank you for the opportunity to commrnt.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1322	Consultee Mr Duncan and Hayley Turp	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Drainage and surface water is a big problem in and around the village of Bratton. Roads have residual surface water on them for a long period after rainfall and this problem will be magnified on all roads below the development. The development scored negatively in 9 out of 12 categories, 2 of the positive categories are very similar and will always score well as a default.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1323	Consultee Mr Duncan and Hayley Turp	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The B3098 is a well-used road and a major junction will cause significant delays and increase the risk of accidents. The development does not have the physical capacity to accommodate the amount of vehicles that will be owned by the new residents. This will cause congestion on the main road – B3098 – and overspill into the surrounding roads and residential areas. The congestion will have an extremely detrimental effect on the village – 1 badly parked car can cause traffic jams up to 10 cars long so the impact of up to an additional 80 cars will be catastrophic to the peace and tranquillity, road safety, and air quality of the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1324	Consultee Mr Duncan and Hayley Turp	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Bratton surgery is already struggling with the demand on its services. Up to 100 extra residents will cause more problems and increase waiting times at the surgery.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1325	Consultee Mr Duncan and Hayley Turp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		In 2014, Wiltshire Council published the results of the Bratton Parish Housing Needs Survey. The aim of the survey was “to investigate the need for affordable housing among local people (or those who have a need to live in the parish or the locality) of Bratton.” The survey recorded a “very good” response rate of 198 replies (35.9%). Of the 198 replies, 11 respondents indicated their need for additional housing in Bratton. All declared a local connection to Bratton, and the most popular reason given for needing to move was in order to move on from living with families and achieve independence. An online search shows 54 houses available in Westbury and a 3-mile surrounding area, ranging from 1 bedroom to 3 bedrooms – all under the national average price. There is NO NEED to build new developments, as there is already more property available than is being proposed.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1326	Consultee Mr Rob Parker-Norman	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126764	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst I appreciate the need for suitable housing in the local area, I have several concerns regarding this proposal. The access onto the B3098 will create a safety hotspot where you have a large number of vehicles trying to enter/exit onto an already busy road. Furthermore, the road is narrow and will struggle with the additional number of cars. Access onto Court Lane cannot be made effectively. Parking is very often insufficient in housing developments. Overflow vehicles will then create a further safety hazard and stop traffic flow on the B3098.</p> <p>Widen and improve the B3098.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1327	Consultee Mr Rob Parker-Norman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126764		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst I appreciate the need for suitable housing in the local area, I have several concerns regarding this proposal.</p> <p>The density of proposed dwellings will create the most densely populated area within Bratton. Given that planning has been refused on several occasions for this site when less houses were proposed, I am concerned that there now seems to be a suggestion that more houses would be workable.</p> <p>The impact on the wider view of the area, including the White Horse, will be negatively impacted by such a high-density dwelling.</p> <p>Reduce the number of dwellings considerably.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1328	Consultee Mr Rob Parker-Norman	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126764	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst I appreciate the need for suitable housing in the local area, I have several concerns regarding this proposal. Developing the green space will negatively impact drainage in the area. Properties in Rosenheim Rise already have to deal with drainage running down the natural contours of the land. I am concerned that drainage will not be properly taken into account in the development and the foundations of new and existing properties could be negatively effected.</p> <p>Ensure that sufficient green space is built into the development with properly considered and engineered drainage.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1329	Consultee Mr Rob Parker-Norman	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126764	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst I appreciate the need for suitable housing in the local area, I have several concerns regarding this proposal. Local infrastructure such as the school and local doctor's surgery will struggle with the additional residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1330	Consultee Mrs Jo Vaux Trustee - Seend Lye Field	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1128439		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40 Proposed amendments to the settlement boundary for Seend			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In the case of the WI allotments, in Appendix 3 map grid H6, the well-used allotments are bounded on west, east and south sides by the built environment. To the north, half the boundary consists of an open field and the built environment to the east extends well north of that northern boundary. There is a sense that one is on land within the settlement and not on land more related to the open countryside. As a WI allotment holder I can personally confirm this viewpoint. The boundary change methodology therefore does not stand scrutiny</p> <p>The Seend Lye Recreation Field (SLRF), now excluded from the Seend large village settlement by the proposed boundary change, has been part of the settlement since the 1960s. The SLRF is enclosed on three sides by the built environment of the settlement. The SLRF has constructed upon it a cricket pitch, 2 tennis courts, a children's play area, an equipment store and a concrete pad for cricket net practice. All of these features are said, by the methodology, to be "more related to the open countryside" than the settlement is patently not the case due to the very recreational nature and physical location of these facilities. Furthermore, when standing on the SLRF one has the sense of being in the settlement and not in the open countryside or anywhere related to the open countryside. The Seend WI considers that both recreational areas, the WI Allotments and the SLRF, must be retained as part of the Seend settlement, within the settlement boundary.</p> <p>The change necessary to achieve consistency and accuracy is to do nothing and leave the Seend settlement boundary unchanged but subject to review by the forthcoming Seend Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1331	Consultee Mr Rob Parker-Norman	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126764	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst I appreciate the need for suitable housing in the local area, I have several concerns regarding this proposal. The impact on the wider view of the area, including the White Horse, will be negatively impacted by such a high-density dwelling.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1332	Consultee Mr Mark Warner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126763	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <p>The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of sustainable development”.</p> <p>Paa 4.16 of the Draft Allocation Plan: “Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”</p>				

Comment ID:	1333	Consultee Mr Mark Warner Person ID: 1126763	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE</p> <ul style="list-style-type: none"> • Para 5.128 of the Draft Allocation Plan says: “The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS”. This is simply not true. • The “Salisbury Transport Strategy” (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyratory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed. • Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: • “Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy.” • It should also be noted that such “Salisbury Transport Strategy” as exists is not detailed and has never been subject to public consultation or formal adoption. • Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end. • We have heard cavalier talk from City Councillors as to how the Harnham Gyratory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague “solutions” should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through. • There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess. 				

	<ul style="list-style-type: none"> • I feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all. • Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>"The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan."</p>

Comment ID:	1334	Consultee Mr Mark Warner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126763		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		<p>VEHICLE FUMES</p> <p>It is not clear if any study has been made of the potential effect of the increased exhaust from the projected additional traffic through Harnham</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		<p>"The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan."</p>			

Comment ID:	1335	Consultee Mr Mark Warner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126763	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
		FLOOD & SEWAGE IMPACT			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<ul style="list-style-type: none"> • Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain. Our understanding from drainage engineers is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites. • Site S1027 is well known locally for having standing water regularly during the winter. • There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		"The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan."			

Comment ID:	1336	Consultee Mr Mark Warner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126763		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		NOISE • A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”			

Comment ID:	1337	Consultee Mr Mark Warner Person ID: 1126763	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
		FLAWED PROCESS <ul style="list-style-type: none"> • We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process. • The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed. • The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan. • The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”			

Comment ID:	1338	Consultee Mr Mark Warner Person ID: 1126763	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	VISUAL AMENITY / HERITAGE LANDSCAPE <ul style="list-style-type: none"> The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset. <p>In fact much more could be made of the recreational value of this landscape in terms of footpaths and cycle ways which would allow more people (both local and tourists) to enjoy the stunning views of the City and Cathedral.</p> <p>The local Scouts use this area regularly for hikes and navigation exercises.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	“The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.”				

Comment ID:	1339	Consultee Mr Mark Warner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126763		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Numbers H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GENERALLY ILLOGICAL</p> <ul style="list-style-type: none"> No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school. The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>"The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan."</p>				

Comment ID:	1340	Consultee Brian and Valeria Roberts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128466	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We would like to add our objection to the additional 40 homes proposed on the above site. As well as the obvious impact such a large increase in houses in the village would have on the school etc one of my main concerns is the traffic on Tetbury Lane. As it is planning was given for a pig farm at Cheglow Field farm . This has increased the volume of large vehicles and in addition we still get very large vehicles on route to Melcourt Industries which is also on Tetbury Lane. Sat nav gives the most direct route from the A429 to Tetbury (and Melcourt) down Tetbury Lane . It's a Lane !! Not a road and is single track most for several miles turning right out of Ridgeway . Turn left out of Ridgeway and again it's single track up to the Dawneys and then not very wide up to the main road .</p> <p>In addition a large quantity of heavy farm vehicles use the lane , understandable as this is a farming area but the size of these leave little room for those on foot . As a regular walker in both directions any increase in the volume of traffic would be unacceptable and dangerous and as it stands the extra 10 houses will add to this risk. Crudwell is a village , Tetbury Lane is a Lane , surely sites can be found with better access to main routes . The proposed development is on farm land , let's hope it stays that way and not ruin the present amenities to satisfy the greed of landowners and developers in an area clearly not suitable for an extra 40 homes Let's hope common sense will prevail.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1341	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE) Person ID: 1126779	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	The Community Area Topic Paper – Salisbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Introduction</p> <p>The Wiltshire Housing Allocation Plan, published in June 2017, raises various points of concern, particularly with regard to the proposed developments at Netherhampton Road, Salisbury. This commentary is submitted on behalf of the South Wiltshire group of the Campaign to Protect Rural England.</p> <p>The Community Area Topic Paper – Salisbury, part of the Pre-submission draft plan, indicates that the indicative residual housing requirement for Salisbury is 173 dwellings [page 10, para. 2.9, table 2.2]. Two sites in Netherhampton Road are identified as suitable for housing development, and labelled as ‘more sustainable’, viz. site S1027 – ‘North of Netherhampton Road’, and site S1028 – ‘Land at Netherhampton Road’ [page 16, para. 5.12, table 5.2]. However, the paper argues “... for a more generous supply of land than is required to meet the residual housing requirement, because of delays in delivering another housing site in Salisbury”, the site in question being Churchfields [page 18, para. 5.21]. The areas of S1027 and S1028 are 5.64 hectares and 9.63 hectares respectively [page 75, appendix G]. The document states that there will be a need to establish a new primary school, and that site S1027 will meet that need [page 19, paras. 5.23 and 5.27], and that the capacity for new dwellings at S1027 is 100, and at S1028 is 640, far in excess of the indicative residual housing requirement of 173, and indeed of the number of dwellings initially proposed for this site (400) when the South Wiltshire Core Strategy was under discussion in 2010 [Wiltshire Council Local Development Framework: South Wiltshire Core Strategy - Proposed Submission Draft (DJM/CS/Rev 12), page 54, para. 7.10, July 2009]. It is accepted that there may be adverse effects at S1027 in respect of heritage, landscape, biodiversity, flood risk and pollution [page 20, para. 5.34], but it is asserted that these adverse effects “... are relatively minor and can be resolved by straightforward mitigation measures” [page 20, para. 5.35]. In respect of S1028, it asserts that “There are no overriding environmental constraints that cannot be mitigated through onsite measures” [page 22, para. 5.36]. The document goes on to state that “Potential adverse effects, in terms of impacts on sewage treatment capacity and impacts on the highway network are considered capable of being averted. A refresh of the Salisbury Transport Strategy can occur alongside a detailed Transport Assessment to address the site’s traffic impacts”, and that “therefore a specific viability assessment is necessary” [page 22, para. 5.37].</p> <p>There are serious omissions here. No attempt has been made either to identify with precision the nature of possible adverse effects or environmental constraints, or to quantify their scale, or to detail what “straightforward environmental measures” might be envisaged. As for the “... refresh of the Salisbury Transport Strategy” and the proposed “detailed Transport Assessment”, it is not clear how radical a ‘refresh’ is intended.</p> <p>When this matter was previously considered, as part of the Examination in Public which was part of the consultation exercise for the development of the South Wilts. Core Strategy, it became clear that there were considerable problems with the Salisbury Traffic Model on which the development of such a strategy was to be based. It was made clear then that there was no intention to revisit the model at that time, and no indication that it has been revised since then. The next section of this document addresses the problems of the traffic model.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1342	Consultee Mrs Mary Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106010		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>For a consultation to be meaningful it must be a two-way process, where each listens to views of the other. This has been shamefully inadequate in terms of public meetings, publicity and web sight design and function. Mereley "going through the motions" does not constitute valid consultation.</p> <p>Proper consultation over changes to infrastructure which should be specific, detailed, achievable, measurable and timely. These current documents lack specifics.</p> <p>The council needs to demonstrate that residents lives will not be adversely impacted by gridlock or their homes flooded (more often).</p> <p>A plan linking to major road systems north and south would be more sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1343	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 Netherhampton Road Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Table G.4 Site S1027 – North of Netherhampton Road, summarising pp 79-82 of Pre-submission draft plan: Community Area Topic Paper – Salisbury, claims that all these adverse effects are capable of mitigation, but there is nothing in the way of specific proposals by which this might be achieved, only bald assertions. It does concede that “a lack of infrastructure to support growth would not fit with the area strategy.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1344	Consultee Mrs Mary Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106010		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>H3.1 and H3.3 are unsound because</p> <p>Traffic</p> <p>Salisbury Transport Strategy “measures” would need to include a new bridge over the Avon to accommodate the extra traffic. This is not proposed and all bridges carrying traffic north in the morning and south in the evening are at capacity.</p> <p>Cf – 2011 study showed Netherhampton Rd incapable of sustaining more cars. Earlier development turned down for this reason. No link to major trunk road available without crossing these bridges. Not possible to link one to development infrastructure. Brunel Link and Harnham Relief Rd not going ahead.</p> <p>Look to build away from the flood plain, not disgorging 1,000 cars twice a day onto a B road with bridges at both ends (even a link to Shaftesbury Drove will only be a diversion back to Coombe Rd unless everyone is travelling to Dorset!)</p> <p>The policy obligations can be better met by building near the park and rides in Salisbury or for a new garden town for the whole of Wiltshire near A303.</p> <p>Proper consultation over changes to infrastructure which should be specific, detailed, achievable, measurable and timely. These current documents lack specifics.</p> <p>The council needs to demonstrate that residents lives will not be adversely impacted by gridlock or their homes flooded (more often).</p> <p>A plan linking to major road systems north and south would be more sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1345	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Mitigation measures in respect of site S1028 are listed in Table G.4, which summarises pp 83-88 of Pre-submission draft plan: Community Area Topic Paper – Salisbury. Once again, there are no specific plans, only aspirations and platitudes. For example, the impact on biodiversity will be mitigated by provision of alternative public open spaces, but with no indication as to where these might be. We are advised that the presence of badgers requires assessment, but we are not told what the expected impact of the proposed development on the badger population is expected, or by whom this assessment will be done, or when. We are told that there will be loss of high quality agricultural land, and that development of the site should be located so as to minimise this. Again, there is no specific indication as to how this might be achieved.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1346	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Other impacts requiring mitigation include the effects of the proposed development on air quality an on light pollution. Wiltshire Council accepts that both will have to be mitigated, the latter, because of its effect on the aim of the Cranborne Chase and West Wilts. Downs AONB to achieve Dark Sky status, but no indication is given as to how this is going to be done, or indeed whether they are capable of mitigation at all.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1347	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The local water utility company has indicated that there is insufficient capacity in both the water supply and sewer systems. Wiltshire Council, though, claims this is capable of being resolved, though this does not lie within their remit, and no indication is given as to how this might be achieved.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1348	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The need to mitigate impacts on the landscape and on what is certainly an archaeologically sensitive site. This can be achieved, it is argued, by detailed design, by keeping development below the 75m contour, and by providing blocks of open space and woodland within the site. Again, there is no indication in detail of how this could be achieved.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1349	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Most importantly, adverse impacts on the transport network, it is argued, could be addressed by developing "...the master-planning of this site ... in parallel with a refresh of the Salisbury Transport Strategy". However, since there is no certainty that the revision of the transport strategy could produce the desired mitigation of the impact of the proposed development on the transport network, it is unsatisfactory to do this in parallel with the master planning of the site. It should really be completed first				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1350	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Effective in mitigating the impacts of the development			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposal as laid out in the Wiltshire Housing Allocation Plan are extremely vague, the impacts of the proposed development have been poorly researched, and the plans for mitigation are simply vague aspirations, containing no detail, and no certainty that they will be effective in mitigating the impacts of the development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1351	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury Transport			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The impacts on transport are particularly serious, and there is no accurate basis for the assertion that they are capable of mitigation. The Salisbury Traffic Model is deeply flawed, and likely to lead to erroneous conclusions. It should be remembered that, at the time of the Examination in Public for the South Wiltshire Core Strategy, the Harnham Residents Association arranged a 'drive-in' during the morning rush hour to attempt to mimic the impact of the much smaller development then proposed for Netherhampton Road on the traffic situation, The result was chaotic, with enormous queues building up on and around the Harnham Gyratory.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1352	Consultee Professor Derek Pheby South Wiltshire Group of the Campaign to Protect Rural England (CPRE)	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126779	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In principal, the development of a greenfield site for no other reason than that there have been delays in making a brownfield site available is entirely wrong. It would be far better to concentrate on freeing up and developing the brownfield site in question, rather than destroying permanently an important rural greenfield site on the edge of the city. To permit urban sprawl of this nature simply to overcome a short term planning glitch is completely ill-conceived, and is neither justifiable nor sustainable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1353	Consultee Mrs Mary Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106010		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>For a consultation to be meaningful it must be a two-way process, where each listens to views of the other. This has been shamefully inadequate in terms of public meetings, publicity and web sight design and function. Mereley "going through the motions" does not constitute valid consultation.</p> <p>Proper consultation over changes to infrastructure which should be specific, detailed, achievable, measurable and timely. These current documents lack specifics.</p> <p>The council needs to demonstrate that residents lives will not be adversely impacted by gridlock or their homes flooded (more often).</p> <p>A plan linking to major road systems north and south would be more sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1354	Consultee Mr Ross Kavenagh	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 399816		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.			Effective		
Attached files (Please see Objective)			Consistent with national policy		
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?			Building on greenfield sites should only be suggested once brownfield sites have been explored fully. Evidently this has not been done. Follow the strategy set out in previously consulted documents.		
			To ensure council development officers don't simply ignore public representation as they appear to do whenever public consultation raises awkward questions.		

Comment ID:	1355	Consultee Mr Ross Kavenagh	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 399816	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Housing has not been allocated proportionally across the county with this area being forced to meet the majority of the allocation. This is not justifiable to residents of this part of Wiltshire. Follow the strategy set out in previously consulted documents.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure council development officers don't simply ignore public representation as they appear to do whenever public consultation raises awkward questions.			

Comment ID:	1356	Consultee Mr Ross Kavenagh	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 399816		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.			Effective		
Attached files (Please see Objective)			Consistent with national policy		
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		There is no plan for supporting infrastructure and the impact on the landscape and wildlife will be unacceptable. Follow the strategy set out in previously consulted documents.			
		To ensure council development officers don't simply ignore public representation as they appear to do whenever public consultation raises awkward questions.			

Comment ID:	1357	Consultee Mrs Clare Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126359		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H3.1, H.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plans for a primary school on site do not address existing over subscription of school places. If then secondary aged children are to go to Sarum Academy, where is the travel plan for this? in the absence of one, the additional journeys required will also add to the traffic congestion. Make sure that all the infrastructure is considered and put in place, again before any building is started.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1358	Consultee Mrs Clare Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126359		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H3.1, H.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed site is an area that regularly floods. Possible run off is not known, which may have a negative impact on the flood risk in Harnham. The smaller site (H3.3) is part of the flood plain and often under water.</p> <p>Look long and hard at the traffic implications before going any further. The likely disruption to the whole of the city needs to be considered, thought through and tested before any building is started.</p> <p>Make sure that all the infrastructure is considered and put in place, again before any building is started.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1359	Consultee Mrs Clare Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126359		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H3.1, H.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are limited employment opportunities in Salisbury, so new residents would need to travel to work, again adding to the congestion in both directions. Make sure that all the infrastructure is considered and put in place, again before any building is started.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1360	Consultee Mrs Linda Gee	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124065	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Site Allocation Plan to build on Netherhampton Road. This plan to build on the A3094 is not a good one for many reasons. It is so close to the floodplanes which our forefathers had the knowledge to work with nature to protect the land around the rivers.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1361	Consultee Mrs Linda Gee	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124065	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have lived in Salisbury all my life. I work at the local hospital which is at fully capacity. Doctors surgeries, schools, drainage, bus services and the roads cannot cope with anymore.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1362	Consultee Mrs Linda Gee	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124065	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Many years ago there was a plan for a by-pass, which would have helped, now where that would have run is full of housing, all the outskirts of the city is full.</p> <p>The consultation has been drawn up without proper regard for the impact of these plans on the residents which would be very significant and I believe it is vital that the council is held to account and made to give careful thought to the impact before it adopts this housing sites plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1363	Consultee Mrs Linda Gee	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1124065	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have lived in Salisbury all my life. I work at the local hospital which is at fully capacity. Doctors surgeries, schools, drainage, bus services and the roads cannot cope with anymore.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1364	Consultee Mr and Mrs Philip and Valerie Sims	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128709	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The fields are used by walkers and families. Also the loss of the hedgerows and trees mean that wildlife and bird numbers will drop even further – it is not only bats that people like to see! We have noticed that a tree behind the hammerhead has already been felled.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1365	Consultee Mr and Mrs Philip and Valerie Sims	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128709	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The fields are also liable to get very marshy in wet weather, which makes it's a poor choice for building on.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1366	Consultee Mr and Mrs Philip and Valerie Sims	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128709	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The road network around the proposed development plan is not capable of taking an increase in traffic – it is quite often nose to tail along the Bradley Road and Frome Road. Balmoral Road would not be a suitable access road to the development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1367	Consultee Mr and Mrs Philip and Valerie Sims	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128709	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Amenities in Trowbridge would also be further stretched. So all in all, we would not want this planning permission to be granted.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1368	Consultee Mr and Mrs Philip and Valerie Sims	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128709	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	After careful consideration we felt it necessary to voice our opinions about the development behind Balmoral Road and Boundary Walk (3565). We feel the development is encroaching on the green belt, land that acts as a buffer between Trowbridge and Southwick or North Bradley.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1369	Consultee Cllr Stephen Berry Person ID: 1126511	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is no evidence that a transport infrastructure solution which is financially and physically viable CAN be found. The A3094 is at capacity and cannot take any increased traffic load. Simple tinkering with the Harnham Gyratory and the Intersection of the A3094 with the A36 will have no significant effect on the roads' capacity.</p> <p>It must be shown that there is a transport infrastructure solution capable of implementation which does not involve the a3094. THIS WILL HAVE TO BE RADICAL.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1370	Consultee E Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72,111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1371	Consultee E Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1372	Consultee E Lane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1373	Consultee E Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1374	Consultee Mr Michael Gill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126801		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Rd. , Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	There are also considerations around the risk of flooding which have not been adequately addressed. Clear evidence of the lack of risk of flooding from the building as proposed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1375	Consultee E Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1376	Consultee E Lane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1377	Consultee E Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1378	Consultee E Lane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1379	Consultee E Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1380	Consultee E Lane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1381	Consultee E Lane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1382	Consultee Mr Andrew Prince Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Laverstock & Ford Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Appendix D. Salisbury Community Area Topic Paper			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Parish Council wishes to query some information recorded against two of the SHLAAs listed at Appendix D to the Salisbury Community Area Topic Paper under the heading of 'Consideration'. S119 Od Sarum. The first 2 lines 'Site is listed as strategic site for development under WCS Core Policy 25' is incorrect. It should read 'Site is listed as strategic site for potential development under WCS Core Policy 25' 3381 Land at Manor Form Rd, Ford. The statement is incorrect. It is not listed as a strategic site for development under WCS Core Strategy 25. It is designated as an Asset of Community Value by Wiltshire Council and has been since 5 Jun 2015.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1383	Consultee Mr Andrew Prince Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Laverstock & Ford Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.69			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Parish Council also wishes to offer two comments on Appendix A to the Salisbury Community Area Topic Paper. Settlement Boundary in the vicinity of Hampton Park, Bishopdown Farm and Riverdown Park. The Council is pleased to note that the change proposed in 2015 has been modified and is now restricted to the boundary of the dwellings in these areas. Settlement Boundary in the vicinity of Old Sarum. The developed areas both north and south of The Portway are seen to form part of the Salisbury Settlement Area. This surely cannot be correct as this settlement falls both within the Parish of Laverstock and Ford as well as the Southern Wiltshire Community Area. This area at Old Sarum forms an 'island' which is well separated from the main body of Salisbury Settlement Area and, therefore, it is not logical for it to form part of this. Why is this settlement not identified within the Southern Wiltshire Community Area Topic paper? The document already identifies boundaries for 7 separate settlements and an Old Sarum settlement should form the 8th.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1384	Consultee Mr Andrew Prince Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Laverstock & Ford Parish Council Person ID: 825522		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Laverstock and Ford Parish Council note that the Draft Plan allocates 910 dwellings in the South Wiltshire Housing Market Area against the minimum requirement of 594 to supplement the existing Wiltshire Core Strategy. The Parish has been subjected to some 2600 units being either built, or planning permission granted to be built, over the last 15 years. Furthermore, the Parish Council supported a planning application for development at Longhedge for 673 dwellings - 223 more than called for in the Core Strategy. The Parish Council, therefore, believes strongly that it is unreasonable to consider any further development within the Parish boundaries and is pleased to note that the Draft Plan supports this view.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1385	Consultee E Lane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1386	Consultee Mr & Mrs Mick and Ann Morgan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128720	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Even 50 is too many, no way should they be allowed to build 70.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1387	Consultee Mr Giles Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		This site together with the site proposed south of Netherhampton road would result in overdevelopment and ruin the rural entrance to the city at this situation as well as the views to the Cathedral. Remove the site from the plan. It has not been justified through evidence - flooding, transport etc and therefore is not consistent with national policy or positively prepared. The site should be removed. Remove the site.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1388	Consultee Mr Giles Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site area identified is too large for 100 houses and should be reduced to an area that would better accommodate that number. Remove the site from the plan. It has not been justified through evidence - flooding, transport etc and therefore is not consistent with national policy or positively prepared. The site should be removed. Remove the site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1389	Consultee Mr Giles Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This together with the site to the south of Netherhampton Road would result in an increase in traffic that would be unacceptable.</p> <ul style="list-style-type: none"> · Before submission the council need to complete the proper transport modelling of the increased traffic. Without this it is unfair on the community, and difficult for them to make a reasoned opinion, to push forward without the proper evidence being in the public domain. · A lot of residents in Harnham typically walk or cycle to reach services in Salisbury City Centre, I believe however that the site is too far from the city centre to encourage walking and cycling and that needs to be considered within the transport modelling. · The bus currently takes a circular route, however if this circular route was extended this may actually discourage existing users due to the increased time it would take to travel and the site would therefore need its own bus route rather than extending the existing. · If junctions are introduced to serve new development care should be taken as to the kind of junction. The new junctions at Longhedge and Fugglestone Red have served to urbanise the rural feel to those entrances to Salisbury and this should be avoided here. · The design should be carefully considered and please could we avoid a 'Persimmon' style dense development. Our future communities deserve better. <p>Remove the site from the plan.</p> <p>Ensure transport model is produced to justify plan in line with NPPF prior to any site being taken further through the process.</p> <p>It has not been justified through evidence - flooding, transport etc and therefore is not consistent with national policy or positively prepared. The site should be removed.</p> <p>Remove the site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1390	Consultee Mr Giles Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<ul style="list-style-type: none"> The design should be carefully considered and please could we avoid a 'Persimmon' style dense development. Our future communities deserve better. Remove the site from the plan. It has not been justified through evidence - flooding, transport etc and therefore is not consistent with national policy or positively prepared. The site should be removed. Remove the site. 			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1391	Consultee Mr Peter Craft	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128722	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	As a fairly new Resident in Hullavington, we have already noticed a series of new Property being built in this beautiful village. We were aware that, despite many objections, a proposed development for 50 houses was passed by the Council we would strongly object to a further 20 houses. This village just isn't big enough to take all these extra properties - we only have one small shop and one school. There is enough traffic going through the main street which is fairly narrow in places and a further possible 50 or even 70 vehicles would make things worse. Living in the centre and fairly close to the Street, we see traffic passing through at totally unacceptable speeds.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1392	Consultee Mr Giles Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>· You should not just be allocating whole sites that have been submitted to you via the SHLAA and the private sector. As a representative of the community the council should be undertaking its own proper site assessments and evidence gathering to drill down and allocate only the amount of land required and needed now not the about proposed by a house builder (30 ha). This is a flaw in the process and should be rectified for your submission draft.</p> <p>Due to the above [other representations] the policy is therefore not consistent with the NPPF. Reduce the site area to represent the amount of development you want to allocate to make the plan effective rather than the area of land the developer wants allocation. This is to ensure there are no surprises to the community later on as the site as allocated could probably fit up to 1300 houses on it. Consider all types of development, that could also result in reduced transport movements eg. small supermarket. Ensure good design in keeping with Harnham village. The plan is not fully justified and therefore not effective, positively prepared or consistent with national policy for reason's expressed above.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1393	Consultee Mr Giles Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>· Rather than just assessing housing, you should be looking comprehensively at Salisbury, including community requirements. For example, in order to go to the supermarket every resident in Harnham has to travel through the Harnham Gyrotory system. If a small supermarket (say 1,200 sq m) was also identified on a site such as this, this could reduced substantially traffic movements through the gyratory and also serve residents in Wilton.</p> <p>Due to the above [other representations] the policy is therefore not consistent with the NPPF.</p> <p>The plan is not fully justified and therefore not effective, positively prepared or consistent with national policy for reason's expressed above.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1394	Consultee Mr Giles Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The policy needs to be honest about the amount of employment planned to give certainty, otherwise the community will have no employment and more houses.</p> <p>Due to the above [other representations] the policy is therefore not consistent with the NPPF.</p> <p>Give certainty over the level of employment to be delivered and identify how you are going to deliver it.</p> <p>The plan is not fully justified and therefore not effective, positively prepared or consistent with national policy for reasons expressed above.</p> <p>Reduce the site area to represent the amount of development you want to allocate to make the plan effective rather than the area of land the developer wants allocation. This is to ensure there are no surprises to the community later on as the site as allocated could probably fit up to 1300 houses on it.</p> <p>Produce a Salisbury Transport strategy before you publish a further version to identify the capacity at road junctions. Without this the plan cannot be justified and effective.</p> <p>Consider all types of development, that could also result in reduced transport movements eg. small supermarket.</p> <p>Give certainty over the level of employment to be delivered and identify how you are going to deliver it.</p> <p>Provide certainty to the amount of greenspace to be delivered.</p> <p>Identify with bus operators how the service will be delivered and also negotiate with the developer. A bus is important to the sustainability of the site given its distance from the City Centre.</p> <p>Ensure the entrance junction is not of an overly 'urban' nature.</p> <p>Ensure good design in keeping with Harnham village.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1395	Consultee Mr Giles Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<ul style="list-style-type: none"> The greenspace is welcome. <p>Due to the above [other representations] the policy is therefore not consistent with the NPPF. Provide certainty to the amount of greenspace to be delivered. The plan is not fully justified and therefore not effective, positively prepared or consistent with national policy for reasons expressed above.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1396	Consultee Mr Giles Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> · Before submission the council need to complete the proper transport modelling of the increased traffic. Without this it is unfair on the community, and difficult for them to make a reasoned opinion, to push forward without the proper evidence being in the public domain. · A lot of residents in Harnham typically walk or cycle to reach services in Salisbury City Centre, I believe however that the site is too far from the city centre to encourage walking and cycling and that needs to be considered within the transport modelling. · The bus currently takes a circular route, however if this circular route was extended this may actually discourage existing users due to the increased time it would take to travel and the site would therefore need its own bus route rather than extending the existing. · If junctions are introduced to serve new development care should be taken as to the kind of junction. The new junctions at Longhedge and Fugglestone Red have served to urbanise the rural feel to those entrances to Salisbury and this should be avoided here. <p>Due to the above [other representations] the policy is therefore not consistent with the NPPF. Produce a Salisbury Transport strategy before you publish a further version to identify the capacity at road junctions. Without this the plan cannot be justified and effective. Identify with bus operators how the service will be delivered and also negotiate with the developer. A bus is important to the sustainability of the site given its distance from the City Centre. Ensure the entrance junction is not of an overly 'urban' nature. The plan is not fully justified and therefore not effective, positively prepared or consistent with national policy for reasons expressed above.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1397	Consultee Mr Giles Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126846	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The design should be carefully considered and please could we avoid a 'Persimmon' style dense development. Our future communities deserve better.</p> <p>Due to the above [other representations] the policy is therefore not consistent with the NPPF.</p> <p>Provide certainty to the amount of greenspace to be delivered.</p> <p>Ensure good design in keeping with Harnham village.</p> <p>The plan is not fully justified and therefore not effective, positively prepared or consistent with national policy for reasons expressed above.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1398	Consultee Mrs Mary Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106010		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>H3.1 and H3.3 are unsound because</p> <p>Traffic</p> <p>Salisbury Transport Strategy “measures” would need to include a new bridge over the Avon to accommodate the extra traffic. This is not proposed and all bridges carrying traffic north in the morning and south in the evening are at capacity. Cf – 2011 study showed Netherhampton Rd incapable of sustaining more cars. Earlier development turned down for this reason. No link to major trunk road available without crossing these bridges. Not possible to link one to development infrastructure. Brunel Link and Harnham Relief Rd not going ahead</p> <p>Look to build away from the flood plain, not disgorging 1,000 cars twice a day onto a B road with bridges at both ends (even a link to Shaftesbury Drove will only be a diversion back to Coombe Rd unless everyone is travelling to Dorset!)</p> <p>The policy obligations can be better met by building near the park and rides in Salisbury or for a new garden town for the whole of Wiltshire near A303.</p> <p>Proper consultation over changes to infrastructure which should be specific, detailed, achievable, measurable and timely. These current documents lack specifics.</p> <p>The council needs to demonstrate that residents lives will not be adversely impacted by gridlock or their homes flooded (more often).</p> <p>A plan linking to major road systems north and south would be more sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1399	Consultee Mrs Mary Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106010		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Health</p> <p>Stationary traffic on residential roads has serious effects on child development and behaviour. It impacts on those with heart and lung conditions. Emergency vehicles cannot move through stationary traffic.</p> <p>Proper consultation over changes to infrastructure which should be specific, detailed, achievable, measurable and timely. These current documents lack specifics.</p> <p>The council needs to demonstrate that residents lives will not be adversely impacted by gridlock or their homes flooded (more often).</p> <p>A plan linking to major road systems north and south would be more sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1400	Consultee Mrs Mary Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106010		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Health</p> <p>Stationary traffic on residential roads has serious effects on child development and behaviour. It impacts on those with heart and lung conditions. Emergency vehicles cannot move through stationary traffic.</p> <p>Proper consultation over changes to infrastructure which should be specific, detailed, achievable, measurable and timely. These current documents lack specifics.</p> <p>The council needs to demonstrate that residents lives will not be adversely impacted by gridlock or their homes flooded (more often).</p> <p>A plan linking to major road systems north and south would be more sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1401	Consultee Mr Don Queen	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128725	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Firstly, there was a long process followed to come up with the village area plan of 50 houses, which I understand was agreed by Wiltshire council. I do not like the principle that a developer can immediately come along and undermine the area plan. I already felt that the village plan of 50 was a large expansion on top of all the building that has recently gone on which pre-dated the plan. However I reluctantly accepted this as inevitable. The expanded proposal of 70 houses is going too far, will lead to even more cars etc in the village, and further expands the village footprint into the field with the brook, affecting existing houses at the end of Newtown.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1402	Consultee Ms Gillian Keen	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128729	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to add my voice to those raising objections to increasing the size of the proposed housing development in Hullavington village, on the grounds that 70 new houses would indeed represent an over-development.</p> <p>There should be concern about the effects of development on the land drainage to the Gauze Brook. I have used the footpaths through the fields that adjoin the school playing-field over a number of years, and I know the area to be marshy, and waterlogged, extensively so in the winter and in periods of high rainfall.</p> <p>I hope that provision will be made for the conservation of mature trees on any green area considered for the building of houses.</p> <p>I share concerns about the inevitable, undesirable increase in traffic, through the village itself and on our surrounding minor roads; also about how over-development would change the character of the village.</p> <p>While some further development may have to be accepted as a result of Wiltshire Council's agreement in principle to the proposal, I consider that 50 new houses should be regarded as the absolute maximum number that should be approved.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1403	Consultee Anne, Robert and Francesca Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128733	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We have been residents of Hullavington for over 20 years and live at 5 Belfry Drive, Hullavington, Wiltshire SN14 GQW We agree strongly that a proposal of an additional 20 houses bringing the total up to 70 would present itself as over-development of the village, intensifying the 'already increased traffic' through and surrounding our village, also threatening the wildlife including some rare birds of prey that are in our area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1404	Consultee Mr and Mrs Peter and Mariette Stott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128741	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are Hullavington residents and are keen to conserve the character of the village - we feel that to exceed the already targeted expansion (of fifty dwellings) will be detrimental to its way of life, stretch the infrastructure and overload access road capacity. The impact of Dyson development of the airfield is in addition to this.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1405	Consultee Mrs Mary Tapping	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126945		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Too many too itemise		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>To use the vernacular, it appears to have been "written on the back of a fag packet"! Mistakes were made previously in estimating the contribution which the development of Castle Mead would make to the area's housing needs. These were based on assumptions rather than fact, with the result that it is now said that fewer houses can be built there within the required timescale. This should have been foreseen as a possibility (I understand there are conservation issues) and allowed for. The current proposals in the Housing Site Allocation Plan display a similar lack of accuracy and flexibility and can therefore be expected to fail at some stage during its implementation. In order to make the draft Wiltshire Housing Site Allocations Plan sound, it needs to be totally scrapped and completely re-written from scratch - this time committing more care and intellectual vigour to its construction! Plenty - but I'll keep them for later!. I am disappointed that a project of such importance should take so long to produce with ultimately unworkable proposals.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I do not necessarily wish to speak but I am keen to observe the discussions at first hand.				

Comment ID:	1406	Consultee Mrs Mary Tapping	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126945		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Too many too itemise		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan also displays a lamentable lack of lessons learned from previous debacles. When the building of Elizabeth Way was being discussed initially, objectors pointed out the risk of flooding - both (a) because of the lie of the land and its marshy consistency and (b) because, the more marshy land is concreted over, displaced water will affect other areas and property. As an example my own house, near the top of Horse Road, has experienced two episodes of serious flooding since work on the Hilperton Relief Road commenced.</p> <p>It therefore follows that, the more marshy flood plains are concreted over, the more risk there is to existing properties. Ultimately, the displaced water has to go somewhere.</p> <p>In order to make the draft Wiltshire Housing Site Allocations Plan sound, it needs to be totally scrapped and completely re-written from scratch - this time committing more care and intellectual vigour to its construction!</p> <p>Plenty - but I'll keep them for later!. I am disappointed that a project of such importance should take so long to produce with ultimately unworkable proposals.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I do not necessarily wish to speak but I am keen to observe the discussions at first hand.				

Comment ID:	1407	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72,111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1408	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1409	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1410	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1411	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1412	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1413	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1414	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1415	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1416	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1417	Consultee Lane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1418	Consultee Lane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128743	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1419	Consultee Mr and Mrs Graham and Hilary McDougal	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128755	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are new to the village having only been here less than 12 months and living in a farm yard development which has added further housing to the village. When we first decided to purchase our house at 11 Old Farm Close we popped into a planning meeting in the village hall which was considering the various options for additional housing to meet the Wiltshire Council's 10 year plan requirements. We were impressed with the professional approach of all concerned and noted where the various options were for additional housing around 120 across 5 local villages. There did not appear to be any suggestion that as many as 70 new houses were needed for the area therefore are quite concerned that this number has been dropped into the equation. I believe figures of between 40 to 50 were mentioned. Thus we would support any cause which would campaign to limit the number of houses on the proposed development are to a maximum of 50. Some of which must be social housing to help the younger generation to find affordable accommodation.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1420	Consultee S Anonymous	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72,111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1421	Consultee S Anonymous	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1422	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1423	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1424	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility from sites 3565, 3620 and 1021 The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1425	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1426	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1427	Consultee S Anonymous Person ID: 1128759	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1428	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1429	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1430	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1431	Consultee S Anonymous	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128759	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1432	Consultee Mr and Mrs Mark D Philpotts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128763	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We are in full support of the need for 50 houses to be built in the village and, although nobody likes having building near then, we do support the field designated by Wiltshire Council as a suitable site. That having been said, we are completely against the extension of this building programme to include an extra 20 houses for the following reasons:</p> <ul style="list-style-type: none"> •The Neighbourhood Development plan called for the new housing to be split between the S Large Villages in the Chippenham Community Area and Hullavington having 50 new houses means we are accommodating more than an equal share already – 183 needed between all S large villages. • The extra 20 houses are purely being added by the building company to extend the profit they can extract from this site. There is not identified need within the Neighbourhood Development plan. • They are saying they will provide extra foot paths but we already have over 30 registered WCC paths extending from the village so a little loop around a field will not in effect add anything of value. • The field already has a water meadow at its' bottom so their statement about adding this is questionable. Far from developing an "Environmental" addition with the "Park" they will be disrupting the site with their building and replacing the "natural" state with a manmade solution to their water drainage issues. • Access onto "The Street" is already going to be a challenge for them with the original 50 house let alone extending it to 70. It is already a narrow and dangerous entrance to the village. <p>To sum up, we fully support the building of 50 houses on the Wiltshire Council suggested site but are also fully AGAINST the extension of this development to 70 houses disrupting the adjacent field.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1433	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.21, H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The biggest single factor against this development is the increase in traffic. With the lack of public transport, lack of any shopping facilities (including the city centre, schools and GP surgeries) within waking distance and no jobs in Salisbury, the residents will need to use private transport for everything. Assuming an average of 2 cars per household (and usually more) this will add 200 additional vehicles to the road network.</p> <p>The Netherhampton road and particularly the Wilton Road Roundabout and Harnham gyratory are barely able to cope with the current traffic flow. Successive attempts to address this with various ideas for a bypass have failed to find any solution. I am not convinced that any new study will succeed where these have not. There is simply nowhere else for the traffic to go without a major costly and environmentally damaging trunk road construction project.</p> <p>2. Conduct a detailed transport impact assessment to understand impacts on the local and strategic road network and how these will be mitigated.</p> <p>Conduct all precursor studies before taking this plan forward.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I am a Harnham resident and wish to contribute to the debate			

Comment ID:	1434	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.21, H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Conduct a full flooding impact assessment taking into account both the groundwater from proposal H3.1 and the surface run off water from proposal H3.3 Conduct all precursor studies before taking this plan forward.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a Harnham resident and wish to contribute to the debate				

Comment ID:	1435	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.21, H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. Identify and have firmly in place plans, sites and funding for the additional primary school, secondary school, GPs surgery, public transport and other infrastructure enhancements that have been identified as necessary for this development to work. Conduct all precursor studies before taking this plan forward.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a Harnham resident and wish to contribute to the debate				

Comment ID:	1436	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.19, H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It acknowledges that the sewerage disposal from a development of this size will be a major problem and that 'Developer contributions are unlikely to be sufficient to resolve this matter'. It suggests that 'changes to the discharge consent limits at the Petersfinger STW are likely to be required. An appropriate assessment would be required if the site is taken forward into any subsequent stage of the selection process'. This must be done. 4. Fully investigate and publicise the impact of the worrying recommendation to 'revise the discharge consent limits' at Petersfinger Sewerage treatment works.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a Harnham resident and wish to contribute to the debate.				

Comment ID:	1437	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.19, H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The biggest single factor against this development is the increase in traffic. With the lack of public transport, lack of any shopping facilities (including the city centre, schools and GP surgeries) within waking distance and no jobs in Salisbury, the residents will need to use private transport for everything. With an average of 2 cars per household (and usually more) this will add 1240 additional vehicles to the road network. The Netherhampton road and particularly the Wilton Road Roundabout and Harnham gyratory are barely able to cope with the current traffic flow. Successive attempts to address this with various ideas for a bypass have failed to find any solution. I am not convinced that any new study will succeed. There is simply nowhere else for the traffic to go without a major costly and environmentally damaging trunk road construction project.</p> <p>2. Conduct a detailed transport impact assessment to understand impacts on the local and strategic road network and how these will be mitigated.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a Harnham resident and wish to contribute to the debate.				

Comment ID:	1438	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.19, H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	1. Conduct a full flooding impact assessment taking into account both the groundwater from proposal H3.1 and the surface run off water from proposal H3.3				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a Harnham resident and wish to contribute to the debate.				

Comment ID:	1439	Consultee Mr Robin Clifford	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126918		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Fig 5.19, H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. Identify and have firmly in place plans, sites and funding for the additional primary school, secondary school, GPs surgery and public transport requirements that have been identified as necessary for this development to work.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a Harnham resident and wish to contribute to the debate.				

Comment ID:	1440	Consultee Mr Steve Bint	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128799	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As the saying goes "give an inch and they take a mile!" We have been very concerned about changes to the village both by Dyson recently and now further developers. I fear that our concerns will meet with the normal lip service! We personally have already endured countless disruptions due to houses built in old Farm close. In short whilst we love the village but our concerns; and now this likely the the "icing" mean that after 19 years we really need to move! We really do hope the best for this lovely village whilst it lasts but I'm sure other factors exist! I hope my comments demonstrate that I for one am against this evolution in numbers.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1441	Consultee Mr D Symes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447893	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write to object to these proposals as I live on the Netherhampton Rd and can see the huge traffic problems such a large development would cause, bringing gridlock to the Harnham Gyratory. The very reason another development (The Meadows) was turned down recently, as this should be too!</p> <p>Please will the planners, the Highways and the Environment Agency please look seriously at these points as they could so easily ruin places and homes of many local residents, as well as the buyers of the new homes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1442	Consultee Mr D Symes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447893	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed development will be on water meadows. The Environment Agency spent millions of pounds a few years ago on flood defences in Harnham (five rivers run through Salisbury). If this development went ahead (the houses being built on the wrong side of the bund) all the runoff from so many roofs and drives would undermine all that work and cost.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1443	Consultee Mr T Wakeman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447943	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3: Facilities For a development of this size a new primary school, medical centre, shops and a bus service would be needed, are these in the plans for future development and would it be a stipulation for developers to adhere to?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1444	Consultee Mr T Wakeman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447943	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2: New Developments and its effect on flood risk to existing property This is a paragraph from RTPi Southwest Division study regarding flooding and flood plains. New development both in and outside of the floodplain can have an effect on flood risk and flood levels elsewhere. The effects are summarised as follows: Development in the floodplain could be at risk from flooding itself. In times of flood, development in the floodplain may obstruct the flow of flood water. This can increase flood levels upstream thus increasing upstream flood risk. Development in a floodplain may reduce the amount of land available for flood water storage. Loss of flood water storage reduces the ability of the floodplain to store floodwater which results in an increase in downstream levels, thereby increasing downstream flood risks. Surface water drainage from areas outside the floodplain can also have an effect on flood risk. In many cases development will result in an increase in concrete and paved areas, through which water cannot penetrate. Water therefore runs off these areas in greater volumes and at a quicker rate than previous, causing higher flows in rivers for shorter periods of time. This can result in an increased flood risk downstream. The alteration of flow patterns, with higher flow rates for shorter periods and reduced flows at normal times can dramatically alter the river habitat. Increased flow rates can cause erosion of riverbanks and beds, resulting in the deposition of material downstream. These changes can destroy habitats and alter the natural flora and fauna. This is a report from BBC news on Tuesday 28 February 2006 Future flood defences on display A new underground pumping station, raised flood banks and new flood walls form the blueprint for future flood defence at Harnham, near Salisbury. An exhibition depicting the preferred option for new Environment Agency flood defences has opened to the public. Floods have affected the area regularly with problems reported in 1960, 1979, 1990, 1995 and 2000. In 1979 flooding affected 25 properties and in 1990 eight homes were under water with 19 more seriously affected. Studies by the Environment Agency show 340 properties are currently at risk from a severe flood, with a one-in-100 chance of occurring in any one year. The preferred option will involve raising existing flood banks at Waldrons Farm, Gypsy Lane and Middle Street Meadow, constructing new flood banks across Middle Street Meadow and the Recreation Ground, building flood walls around the Old Mill Hotel and in Town Path and constructing an underground pumping station in the Recreation Ground. "We have considered a wide range of factors including the height of the defences, effect on flood levels, opinions of local people and cost before coming to this proposal," said Nick Lyness, of the Environment Agency.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1445	Consultee Mr T Wakeman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447943		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>S1027 and S1028 Netherhampton Road Salisbury Wilts</p> <p>We write to object to the proposals outlined in your draft plan.</p> <p>We all need houses or somewhere to live but at what cost. Anybody with knowledge of Harnham and particularly Netherhampton Road will tell you it's already very busy. A plan for 740 houses and industrial units (or maybe over a 1000 houses if the industrial units don't work out) will cause havoc unless some sort of better infrastructure is put into place.</p> <p>1: Transport</p> <p>The Netherhampton Road A3094 provides a half-hearted bypass to some of the worst of Salisbury's traffic, providing you are passing from the A30/A36 at Wilton to the A338/A354 to the south of the city, or vice-versa. It doesn't, however, miss out Wilton and the junction at Park Wall or the Harnham Gyratory in East Harnham where most bottlenecks occur.</p> <p>The increase of traffic from these new developments would have a very adverse affect on this already over populated road system. In our opinion a bypass would be needed to alleviate the problem or this side of Salisbury will become gridlocked.</p> <p>We have lived in Netherhampton Road for 28 years and seen some considerable changes in that time including the upgrading of the 83094 to the A3094 and a definite increase of traffic.</p> <p>Benefit</p> <p>Lastly who would benefit most from this development, the landowner, the developer, or the people who actually need these houses and the facilities that go with it.</p> <p>Wiltshire Council must take a strong hold as their failings in the past always come back to haunt them namely having a road to nowhere (now gone) and a ring road that splits a town in half.</p> <p>* Please Wiltshire Council look at the bigger picture otherwise Salisbury will become a place to avoid adversely affecting tourism and the local economy.</p> <p>My final note is if Salisbury's inhabitants were a pile of stones in the middle of a field and of some significance we would get a bypass but we're not we just live here and are obviously not that important.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1446	Consultee Mr T Painter	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 901829	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Land at Shallowaggon Lane, Westbury (SHLAA Ref: 3445)</p> <p>Policy H2: we consider that the draft Plan should be making provision for additional housing growth in the Westbury Community Area on the following basis:</p> <p>The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026. There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative deliverable sites in Westbury, which is the next tier down in the Core Strategy settlement hierarchy. There is an unmet affordable housing need in Westbury which can only be addressed by the provision of new housing to subsidise the provision of new affordable housing. There is no Neighbourhood Plan being prepared for Westbury. It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in the Westbury Community Area, that the subject site should be included as an allocation for circa 80-90 homes in the draft Plan.</p> <p>Site context: the subject site of approximately 3.8 ha comprises an arable field with defensible boundaries: Hawkeridge Road to the west; Shallow Waggon Lane to the south; the railway to the east, and a former railway siding to the north.</p> <p>The site lies immediately to the south of the Hawke Ridge Business Park strategic employment allocation, and is within an area that has been subject to significant change with new solar parks and other development proposals. The arable site is relatively flat and unconstrained. In landscape terms, the site is very well contained, and apart from the hedgerow boundaries there is very little ecological interest. There is a regular half hour bus service along Hawkeridge Road connecting to Westbury and Trowbridge. Our initial assessment of the site suggests that it could accommodate circa 80-90 dwellings also making provision of onsite public open space and strategic landscaping. The landowner would also consider a mixed-use scheme building upon the potential synergy with Hawke Ridge Business Park.</p> <p>Statement of Common Ground: the landowner confirms his willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that the landowner would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan. Policy H2: Wiltshire Council to allocate the subject site for circa 80-90 dwelling units as outlined in enclosed Site Location Plan (SHLAA Ref: 3445).</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To make the planning case for the subject 'omission' site (SHLAA Ref: 3445) to be included as an allocation in the draft Plan.			

Comment ID:	1447	Consultee Mr Andrew de Lukacs Lessner Person ID: 706936	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster site allocations and settlement boundary			Positively prepared	Justified Effective Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advise that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocate new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared- the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of The Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire, force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p> <p>The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1448	Consultee F Sheppard	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 901801	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Turnpike Field, Old Dilton Lane, Westbury (SHLAA Ref: 3375)</p> <p>Policy H2: we consider that the draft Plan should be making provision for additional housing growth in the Westbury Community Area on the following basis:</p> <p>The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026.</p> <p>There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative deliverable sites in Westbury, which is the next tier down in the Core Strategy settlement hierarchy.</p> <p>There is an unmet affordable housing need in Westbury which can only be addressed by the provision of new housing to subsidise the provision of new affordable housing.</p> <p>There is no Neighbourhood Plan being prepared for Westbury.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in the Westbury Community Area, that the subject site should be included as an allocation for circa 80-90 homes in the draft Plan.</p> <p>Site context: the subject site of approximately 3.3 ha comprises an arable field with defensible boundaries adjoining the southern edge of Westbury, and bounded by the A350 to the west, and Old Dilton Lane to the East.</p> <p>The site is relatively flat and unconstrained other than the mature trees and hedgerows on the boundary, and a small cluster of trees located centrally within the site. In landscape terms the site is very well contained.</p> <p>Preliminary advice from transport consultants indicates that a new roundabout access could be formed at the junction of the A350/Old Dilton Lane. In spatial terms, the site relates well to existing development to the north and east, and would represent a natural rounding-off of the settlement with potential to form a new permanent boundary to the south side of Westbury.</p> <p>The site performs well in accessibility terms lying approximately 1.2km from the Westbury Leigh Local Centre. There are existing bus stops immediately adjacent to the site, and a footway on the western side of the A350 which could be further enhanced by the proposals. Our initial assessment of the site suggests that it could accommodate circa 80-90 dwellings also making provision of on-site public open space and strategic landscaping.</p> <p>Statement of Common Ground: the landowner confirms his willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that the landowner would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: Wiltshire Council to allocate the subject site for circa 80-90 dwelling units as outlined in enclosed Site Location Plan (SHLAA Ref: 3375).</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To make the planning case for the subject 'omission' site (SHLAA Ref: 3375) to be included as an allocation in the draft Plan.

Comment ID:	1449	Consultee Mrs Elizabeth de Lukacs Lessner Person ID: 704457	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster site allocations and settlement boundary		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advise that Wiltshire proposes to:</p> <p>Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages;</p> <p>and Allocate new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared- the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of The Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire, force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p>				

	<p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p> <p>The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1450	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Page 18		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The figures in the paragraph 4.1table come from table 4.2 in Topic Paper 3. The 'minimum to be allocated' column of table 4.1 is the 'Indicative Remaining Requirement' column of table 4.2.</p> <p>The 'Indicative Remain Requirement' column only considers allocations and does not include any allowance for windfall (See Topic Paper 3 paragraph 4.13).</p> <p>In order to meet the Minimum Housing Requirement the Core Strategy not only used site allocations but also windfall (See Core Strategy paragraph 5.13). Therefore to be consistent to the original Core Strategy methodology to calculate the 'Minimum to be Allocated' figure an allowance for windfall should also be included.</p> <p>Using the anticipated windfall allowance for 2017-2026 (See Topic Paper Table 5.1) the 'Minimum to be Allocated' figures should be:</p> <ul style="list-style-type: none"> - East Wiltshire HMA: -641 - North & West Wiltshire HMA: -1515 - South Wiltshire HMA: -142 <p>Therefore, rather than needing to allocate additional housing sites, the figures above indicate that Wiltshire has already allocated more housing than is required to meet the Minimum Housing Requirement outlined in the Core Strategy.</p> <p>The delay in the Chippenham DPD examination meant that for a considerable period Wiltshire was unable to demonstrate a 5 Year Housing Supply, thereby allowing sites not originally allocated in the Core Strategy to be granted planning permission. Although some Core Strategy allocations have not yet reached the commitment stage, these have been more than compensated for by the unanticipated speculative allocations.</p> <p>The overall effect is that to meet the Minimum Housing Requirement of 41,100 houses (excluding 900 West of Swindon) shown in Core Policy 2 of the Core Strategy, Wiltshire is intending to increase this figure by 11% to 45,629 houses. Even without the allocations proposed in this DPD, the overall housing figure is 43,398, an increase of 5.5% over the Core Strategy figure.</p> <p>No evidence in terms of an update to the Strategic Housing Market Assessments has been provided to justify this increase.</p> <p>Wiltshire Council must reassess and update the Minimum Housing Requirement figures based on a consistent methodology outlined in the Core Strategy before allocating new sites and changing settlement boundaries.</p> <p>Any change to housing number targets thereafter should be based on an evidence based approach justifying an increase.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to		EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some			

participate at the oral part of the examination?

400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.
EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).

Comment ID:	1451	Consultee Ashford Homes (South West) Ltd Person ID: 392243	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2: we consider that the draft Plan should be making provision for additional growth in the Trowbridge area on the following basis: The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026.</p> <p>There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative deliverable sites.</p> <p>The Housing White Paper (February 2017) seeks to diversify the supply of new housing in response to the dominance of the national / PLC volume home builders. The subject site is of a size that is suitable for development by a local / regional housebuilder.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in Trowbridge, that the subject site should be included as a housing allocation for circa 24 homes in the draft Plan.</p> <p>Promotion history: This representation is submitted on behalf of Ashford Homes (South West) Ltd, a wholly owned subsidiary of the Doric Group, who are the freehold owners of land at Marsh Road, Hilperton. The subject site of 0.8ha is located on the northern side of Marsh Road as outlined in red on Drawing 1032/001 (enclosed).</p> <p>The site has been subject to a previous application proposal for 30 dwellings which was dismissed at appeal in August 2013 (LPA Ref: W/12/01840/OUT & PINS Ref: 2192250). Subsequently, a lower density scheme of 24 units was the subject of a pre-application enquiry to Wiltshire Council (LPA Ref: 14/1887/PREAPP). This scheme was not progressed due to the location of the site adjacent to, but outside the settlement boundary, albeit that the site is fully contained by defensible boundaries on all sides. At a public consultation event in 2012 it was evident that there was widespread support for the principle of housing on this site.</p> <p>Representations have been submitted to the Regulation 14 version of the Hilperton Neighbourhood Plan. As drafted, the HNP is a 'restraint' plan, and is not seeking to make any housing allocations. We have attempted to engage proactively with the HNP Steering Group but no response has been received. In light of this, we consider that it would be entirely appropriate for Wiltshire Council to make provision of additional housing growth in Hilperton through the Housing Site Allocation Plan process.</p> <p>Design development: Ashford Homes have developed a full technical evidence base that can demonstrate that circa 24 dwellings could be accommodated on the subject site. In spatial planning terms, the site represents a natural rounding off of the settlement. The Council did not raise any technical objections to the previous planning application W/12/01840/OUT.</p> <p>Statement of Common Ground: Ashford Homes confirm their willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that Ashford Homes would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: to allocate land at Marsh Road, Hilperton for 24 No. residential dwellings and/or amend Hilperton's settlement boundary to include the site.</p>			

Attached files (Please see Objective)	4714916
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.

Comment ID:	1452	Consultee Mr Tim Hounsome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 403859		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Likewise health and education shortfalls need to be secured prior to development. Core Strategy strategic objective 6 and Policy 3 require infrastructure delivery plans to be in place before development takes place. Consequently the text supporting the allocation needs to be explicit about securing infrastructure before development takes place.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1453	Consultee Mr Tim Hounsome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 403859		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The allocation of the site (together with the other allocations) still leaves a potential shortfall in identified housing provision in the Trowbridge area. It is essential that the target figure for the site is adhered to and not increased in order to meet the shortfall or as a result of developer pressure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1454	Consultee Mr Tim Hounsome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 403859		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is important to retain the existing open land between the retail park and the A 363 and corresponding land on the southern side of the A363. This is required in order to keep Trowbridge separate from North Bradley. Otherwise there will be a continuum of development from Trowbridge into North Bradley.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1455	Consultee Mr Tim Hounsome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 403859		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Access into site H2.2 should only be from the A 363. Access from Woodmarsh or Westbury Road would in effect link/combine the new housing directly with the established parts of North Bradley thereby undermining the objective of keeping the identity and character of the existing village separate and distinct. The interface between the new housing area and older properties along Woodmarsh is particularly sensitive and needs to be carefully designed to ensure the new and old are linked informally through opens spaces, footpaths and landscaping rather than by house boundaries and access roads.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1456	Consultee Mr Nick Parker Chairman	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Page 19		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 4.7 indicates that main settlement areas were selected where land supply failed to meet the indicative levels set out in the Core Strategy. This ignores the fact, made clear in the Core Strategy (paragraph 4.30) and repeated in this document (paragraph 2.18), that the indicative requirement for each Community Area was determined to avoid an unbalanced level of growth and was not intended to be prescriptive.</p> <p>A housing requirement can only be meaningfully calculated in terms of a Housing Market Area (HMA) and to attempt to use the indicative requirement figures as a fixed requirement is meaningless. The only justification for selecting areas in this way would be if the housing requirement for a HMA has not been met. Using the Core Strategy methodology to calculate 5 year land supply, Wiltshire has exceeded the Core Strategy 'Minimum Housing Requirement' in every HMA.</p> <p>Wiltshire Council must reassess and update the Minimum Housing Requirement figures based on a consistent methodology outlined in the Core Strategy before allocating new sites and changing settlement boundaries.</p> <p>Any change to housing number targets thereafter should be based on an evidence based approach justifying an increase.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1457	Consultee Mr Tim Hounsome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 403859		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is noted the allocation includes Nos. 16 and 18 Woodmarsh whereas all the other properties on the eastern side of Woodmarsh area excluded. The land within these properties may be suitable for limited development in their own right, but for the reasons stated above should not be included in the allocation area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1458	Consultee Mr Tim Hounsome	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 403859		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	If site H2.2 remains an allocation then it should only be developed in accordance with a detailed development brief that has been subject to public consultation.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1459	Consultee Hill Homes Hill Homes Development Ltd Person ID: 900566	Agent Mr Steven Smallman Director Pro Vision Person ID: 1125375	Do you consider the draft WHSAP is legally compliant?	
		Paragraph		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.3 - in relation to Devizes			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Core Policy 12 requires approximately 2,500 new homes to be provided in the Devizes Community Area, of which about 2,010 homes should be at Devizes. This reflects the spatial strategy set out in Core Policy 1 and the role and function of Devizes as the only designated Market Town in the Community Area . Growth is to be concentrated at Devizes to support a sustainable pattern of development and in recognition of the capacity of the Town to accommodate further strategic development.</p> <p>However, Paragraph 4.3 of the draft HSAP explains that "In order to deliver the spatial strategy the priority for housing land allocations has been to focus on those higher tier settlements that have not yet met or contributed towards indicative levels of provision (Principal Settlements/ Market Towns and Local Service Centres)."</p> <p>The Devizes Community Area Topic Paper (June 2017) indicates that there is not an "indicative residual requirement" for Devizes to be delivered during the Plan period, because the "indicative requirement" is met by completions and commitments. The HSAP therefore proposes that no housing sites will be identified for allocation at Devizes, and the site selection process ended after Stage 1.</p> <p>[Representation inserts Table 2.2 of the Devizes Community Area Topic Paper, which can be seen in the attachment 'Rep 1459 (a)']</p> <p>A sizable proportion of the Commitments 2017 - 2026 are the site-specific allocations at Policy H3 of the adopted Devizes Neighbourhood Plan (2015). H3 allocates a total of 15 small/medium sized sites to accommodate 364 dwellings; for the most part within the Settlement Framework Boundary as it was defined by the Kennet Local Plan in 2004. Nine sites are considered capable of delivery in the period 2014- 2019, with the remaining six sites considered capable of delivery in the period 2019-2026.</p> <p>The analysis attached [table can be seen within the attached document 'Rep 1459 (a)] shows that of the 222 dwellings which the Neighbourhood Plan considered would be delivered by 2019, planning permission has been granted in respect of five sites delivering 121 dwellings. There is no recent planning history relating to the other four sites that would indicate that there is any likelihood of them being developed soon (or indeed at all). These sites should not be regarded as "deliverable". Furthermore, the planning history strongly suggests that none of the sites in the second phase (beyond 2019) are "developable".Indeed, one site, Browfort, now has planning permission for 55 "extra care" apartments - clearly a C2 use - which should not be included as contributing to the adopted Core Strategy's Housing Requirements.</p> <p>Overall the evidence suggests that the sites allocated in the Neighbourhood Plan are likely to deliver only 121 dwellings - a shortfall of 243 dwellings.</p> <p>It is therefore now abundantly clear that the HSAP should not rely on the adopted Neighbourhood Plan to deliver the key Core Policy objective of concentrating strategic growth at Devizes, particularly as the "indicative residual requirement" must be regarded as an absolute minimum (as the draft HSAP itself acknowledges at Paragraph 4 .2).</p> <p>If the Core Strategy's spatial strategy for the Community Area is to be delivered and the NPPF's objective to boost significantly the supply of housing (Paragraph 47) is to be met, the HSAP must allocate a site at Devizes to ensure that at the very least the minimum indicative requirement for the Town is delivered, and preferably that it is exceeded. By failing to do so, the draft HSAP has not been positively prepared and will not be effective.It is therefore not sound.</p>				

	<p>Allocate a site Devizes that is deliverable (footnote 11 of the NPPF) and that can accommodate approximately 250 dwellings. We attach a Site Promotion Document [attached documents 'Rep 1459(b)] relating to land at Windsor Drive (in part, SHLAA reference 624). The SHLAA concludes that the northern part of the site now promoted is suitable for development, subject to potential constraints (the southern part was not previously assessed). Much of the site lies within the 20-minute walking distance from the Town Centre, which the Neighbourhood Plan identifies as being a key consideration in determining the most suitable locations for new housing. None of the site is designated as being of special environmental, visual or historic significance (see extract from WCC's online mapping below). [inserted map extract can be seen in the PDF attached to this document - 'Rep 1459 (a).]</p> <p>The Promotion Document demonstrates that the site has the potential to deliver between 250 and 300 dwellings in the form of a logical urban extension to Devizes to create a sustainable new neighbourhood. The site is well related to the existing pattern of development, with good access to local facilities and public transport routes. Development of the site provides the opportunity to enhance the eastern edge of the town, providing a substantial GreenInfrastructure link and landscape buffer to define the edge of settlement, between the open landscape of the AONB to the east and the town edge.</p>
<p>Attached files (Please see Objective)</p>	<p>4715079 / 4715092</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The omission of Land at Windsor Drive Devizes raises substantial doubt about the soundness of the HSAP, because of the inadequacy of the Plan's housing provision (as it relates to the Devizes Community Area).</p>

Comment ID:	1460	Consultee RST Corsham Ltd	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 901187	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.29			Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2: outline planning permission was granted at appeal on 31st May 2017 for a scheme of 31 No. dwellings (following the demolition of 6 No. existing dwellings) at Peacock Grove, Corsham.</p> <p>It is submitted that the settlement boundary for Corsham should be amended to make provision for this housing commitment (LPA Ref: 15/11544/OUT and PINS Ref: 3164145).</p> <p>Following a further assessment of the site parameters and potential development area, RST Corsham Ltd consider that the site has capacity to accommodate up to 50 dwellings.</p> <p>We can confirm that the applicant is committed to taking forward the implementation of the approved planning permission. A new full application will be submitted in 2018, and the site will be fully deliverable within 3 years.</p> <p>Annex A, Corsham proposals map: the settlement boundary to be amended as per the red line on the enclosed Site Location Plan (Ref: AC0107_1001).</p>				
Attached files (Please see Objective)	4714956				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1461	Consultee Mr Geoffrey Wheeler	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126772	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2. The road system is inadequate to accept all new transport.</p> <p>1. Improve sewage systems.</p> <p>2. Build a Ring road round Wilton and Salisbury to link with A303 and the South.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1462	Consultee Mr Geoffrey Wheeler	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126772	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3. There is no bus service to area.</p> <p>1. Improve sewage systems.</p> <p>2. Build a Ring road round Wilton and Salisbury to link with A303 and the South.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1463	Consultee Mr Geoffrey Wheeler	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126772		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Build on the brown field sites in the City. 2. Build a Ring road from Salisbury and Wilton to the A303 and the South major roads.</p> <p>1. Improve sewage systems. 2. Build a Ring road round Wilton and Salisbury to link with A303 and the South.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1464	Consultee Mr Geoffrey Wheeler	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126772	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site nos. H3.1 and H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3. Improve the sewage systems prior to adding further housing on the south side of the City.</p> <p>1. Improve sewage systems. 2. Build a Ring road round Wilton and Salisbury to link with A303 and the South.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1465	Consultee Mr and Mrs Miller Person ID: 901952	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.14			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Proposed allocation: the proposed allocation of land at Court Orchard / Cassways under Policy H2 is supported in principle. This follows a collaborative approach that has been undertaken between the site owners and Wiltshire Council following the initial promotion of the site in 2015. Policy H2.8 and Paragraph 5.93: the land area extent set out in Policy H2.8 and Paragraph 5.93 is incorrectly stated as 1.35ha. Additional land to the western boundary will be required for site drainage and landscape mitigation. The correct extent of the allocation site is 1.61 as shown on the enclosed Site Location Plan (Plan Ref: 1136.011). Fig 5.18: there is an error in the extent of the redline allocation site in Fig 5.18. a Corrected Development Plan Allocation Boundary is enclosed (Plan Ref: 1136.011). Land ownership: the subject site is in the freehold ownership of Mr and Mrs Miller (acquired in 1975). We can confirm on behalf of the landowner that the subject site is available for residential development and that they will cooperate with the Council in respect of the site promotion in consultation with the local community. Summary of planning and site promotion history: The subject site has previously been considered for development following the submission of a planning application in 1993 with Parish Council support (LPA Ref: W93/0507), and representations that were submitted in respect of West Wiltshire District Plan 1st Alteration in 2003. In 2014 the landowner assembled a project team to review the potential of the site to come forward as an allocation. Since the previous consideration of the site, a hedgerow on the western boundary has been established and now forms a defensible boundary. The site is managed and has low ecological potential. A landscape appraisal has been undertaken by Greenhalgh Landscape Architects. This appraisal has confirmed that with mitigation the site could be developed without causing harm to the wider landscape. Additionally, technical studies have confirmed that the site can be accessed by a simple priority junction from the B3098 with a full standard of visibility splays achievable in both directions. The new junction has can be designed in a manner that will reduce vehicle speeds into the village through the provision of a gateway of development on both sides of the road approach into Bratton. The following technical evidence base has been prepared: Topographical survey; Landscape appraisal (GLA); Access feasibility study (WYG); and Site capacity assessment (Keep Architects) Further detailed studies into heritage, ecology, drainage, and levels will inform the next iteration of the masterplan. The site owners have also commenced the process of finding a development partner to assist the delivery of the site. Statement of Common Ground: Mr and Mrs Miller are currently in the process of selecting a residential delivery partner, and will be formulating a vision for the site, which will be underpinned by an updated technical evidence base.</p>				

	<p>It is proposed that a further pre-application enquiry will be submitted in the Autumn of 2017; and that a Statement of Common Ground will be agreed with the Council in advance of the publication of the 'Submission' version of the draft Wiltshire Housing Site Allocations Plan in 2018.</p> <p>Land at Court Orchard / Cassaways, Bratton Policy H2.14 Policy H2.14, Fig 5.12, and Paragraph 5.116: the land area extent set out in Policy H2.14 and Paragraph 5.116 is incorrectly stated as 1.35ha. The correct extent of the allocation site is 1.61ha.</p>
<p>Attached files (Please see Objective)</p>	<p>4715086 / 4728091 / 4728092</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Mr and Mrs Miller wish to be represented at the examination to assist the consideration of the technical issues, and to answer any technical or planning policy related queries that may be raised in the round table discussion by interested parties.</p>

Comment ID:	1466	Consultee Ms Pauline Summers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128886	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to object to the draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites, which have been put forward as preferred sites within the Housing Allocation Plan. My objections are as follows:</p> <p>Contradictions in the strategy A core strategy or local plan is considered 'sound' only when it is consistent with national policy. Paragraphs 72, 111, 156 and 157 of the National Planning Framework and Planning Guidance documents state that the local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale(15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site, however these will not be completed in time, and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brown field sites on the basis that they are within the existing settlement boundary. It is difficult to understand why 'green field' sites have been preferred to the many 'brown field' sites which exist within the town other than to placate potential developers.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1467	Consultee Ms Pauline Summers	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128886		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility</p> <p>The A361 is prone to accidents both in 'the dip' where cars currently turn into the Country Park, as well as in the 30 mph limit zone further up the hill towards Trowbridge. Further access points, even with tightened speed restrictions, would only make matters worse. Also, sites at Church Lane, Southwick Court and Oldbrick fields are being considered on the basis that they would reduce traffic, as residents would walk into Trowbridge rather than using their own vehicles. No evidence has been provided to show that this would be the case. Since the majority of households have two cars there could be an extra 400 cars travelling along the already congested Frame Road at rush hour. The council's views that they can justify development here, as opposed to local villages, on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure nor the setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1468	Consultee Ms Pauline Summers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128886	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment The fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foxes, badgers, many bird species and rare foraging bats.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1469	Consultee Ms Pauline Summers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128886	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment The fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foxes, badgers, many bird species and rare foraging bats.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1470	Consultee Ms Pauline Summers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128886	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition the ancient hedgerows and fields provide the setting for at least five listed buildings as well as an archaeological site of an ancient water meadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1471	Consultee Ms Pauline Summers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128886	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In fact, the council has discounted a number of brown field sites on the basis that they are within the existing settlement boundary. It is difficult to understand why 'green field' sites have been preferred to the many 'brown field' sites which exist within the town other than to placate potential developers.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1472	Consultee Ms Pauline Summers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128886	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The council's views that they can justify development here, as opposed to local villages, on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure nor the setting for development on this side of town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1473	Consultee Newland Homes Person ID: 395553	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.58			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Background and planning history: Land to the north of east of Station Road is subject to a development plan allocation allocated in the adopted Wiltshire Core Strategy for housing as shown on Inset Map 14: Westbury. The site is allocated under Saved Policy H3 of the West Wiltshire District Local Plan 1st Alteration (2004), which allocated the application site for 90 dwellings. The allocation is carried forward under Policies CP2 and CP32 of the adopted Core Strategy. The allocation also falls within defined settlement boundary for Westbury under Policy CP1. Planning permission W/10/02479/FUL for 102 dwellings was permitted in November 2013. Although this permission has lapsed, Newland Homes have recently submitted a planning application for 88 homes, which is currently under consideration (Ref: 17/07548/FUL). Given that the principle of residential development of this site is subject to a development plan allocation in the Core Strategy, and a live planning application, we submit that the settlement boundary on the proposals map should be reinstated to its original alignment, as outlined in blue on Westbury Proposals Map for Revised Settlement boundaries. The settlement boundary on the proposals map should be reinstated to its original alignment, as outlined in blue on Westbury Proposals Map for Revised Settlement Boundaries.				
Attached files (Please see Objective)	4715119				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1474	Consultee Mr Peter Brabner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705001		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Cassways, Bratton		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site is not a suitable for a large housing development, as:</p> <p>The site is very prominently seen from the B3098, the main Westbury Road, as one enters the village – the site drops sharply away from this road before leveling out, so that the layout of any buildings, etc in the area could not be hidden or shielded from view.</p> <p>The whole area is in an area of outstanding beauty and this proposed development would impact very significantly on the views from the Westbury White Horse and the top of Salisbury Plain.</p> <p>The site would have an adverse effect on the conservation area of the village.</p> <p>The development would represent an over-development of the site and would have an adverse impact on local amenity.</p> <p>The Council should address sustainability issues and consider smaller units to be integrated into the existing infrastructure which would reduce the impact on the village and its community. This would also preserve the beauty of the whole area below the White Horse ridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1475	Consultee Mr Peter Brabner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705001		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Cassways, Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site is not a suitable for a large housing development, as: The development would have a detrimental impact on the already over burdened infrastructure and services of the village – water, drains, pre-school and primary school, GP surgery, shop. An extra 40 additional houses would bring major disruption and pressures to the whole community. In addition, the number of houses proposed is significantly over the number as assessed by the Parish Council's own Housing Survey in 2015 (8 dwellings). The Site Allocations Plan for Bratton seems also to be based on a misrepresentation of the number of houses in Bratton ie there actually less 520 houses, whereas the Council has referred to there being 819 houses!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1476	Consultee Mr Peter Brabner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705001	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Cassways, Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Access to the site from the narrow main road, B3098, would be difficult. The changes needed would in themselves make a significant impact on the village. The B3098 is very busy especially at each end of the day, with regular heavy traffic incl large lorries. The number of vehicles through the village can exceed 400 per hour as recorded by the village Speed Watch team			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1477	Consultee Mr Peter Brabner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705001		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Cassways, Bratton		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Bratton does not need the proposed number of additional dwellings; it may be that Wiltshire has been required to identify sites for additional housing for people from other areas/parts of the country, but that alone does not justify the selection of Bratton to place them. The village would not be able to absorb the excessive number of adults and children that a housing development of 40 houses would bring. Based on Table E.1 in Appendix E (page 39) of the Wiltshire Council Site Allocation Plan (where it highlights that the village has experienced growth of 26 houses in the last 10 years), a further addition of 40 dwellings would mean more than a 17% increase in the total number of houses since 2007.</p> <p>The Council should address sustainability issues and consider smaller units to be integrated into the existing infrastructure which would reduce the impact on the village and its community. This would also preserve the beauty of the whole area below the White Horse ridge.</p> <p>The current plan seems to take a simplistic approach to try to place a large number of houses in an area which has been highlighted by the local owner, which had been purchased many years ago. The Council's own assessment of the area highlighted a number of sustainability problems. Instead, it is more important to pursue other potential sites for development within the existing settlement boundary to meet local need. For example, the field next to Peartree Orchard is one such area (which is owned by Bratton Parish Council, and which they have raised with Wiltshire Council). Additionally, there are currently planning applications under consideration for the replacement of Oxford House, The Butts, with four dwellings, and the much delayed completion of a 4-bedroom house on land next to 1A Lower Road.</p> <p>In addition, the number of houses proposed is significantly over the number as assessed by the Parish Council's own Housing Survey in 2015 (8 dwellings). The Site Allocations Plan for Bratton seems also to be based on a misrepresentation of the number of houses in Bratton ie there actually less 520 houses, whereas the Council has referred to there being 819 houses!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1478	Consultee Avon and Wiltshire Mental Health Care Trust	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 901977	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1; Greenacres, Green Lane, Devizes		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy H1: notwithstanding the adoption of the Devizes Neighbourhood Plan in 2015, and the progress that has been made in respect of housing delivery in Devizes against the Core Strategy's disaggregated targets for each community area, we consider that the draft Plan should be making provision for additional growth in Devizes on the following basis:</p> <p>The draft Plan has taken a minimal and conservative approach to new housing growth in the East Housing Market Area over the Core Strategy Plan period to 2026.</p> <p>The adopted Devizes Neighbourhood Plan is a restraint plan that does not propose any housing allocations.</p> <p>There is an unmet affordable housing need in Devizes, which can only be addressed by the provision of new housing.</p> <p>The Council should be working proactively with public sector organisations to release surplus land assets, which in turn will enable the proceeds to be re-invested in the provision of mental health services.</p> <p>The Housing White Paper (February 2017) seeks to diversify the supply of new housing in response to the dominance of the national / PLC volume home builders. The subject site is of a size that is suitable for development by a local / regional housebuilder.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and the Core Strategy housing requirement in the East Market Area, and specifically, to meet the need for new affordable homes in Devizes, that the subject site should be included as an allocation for circa 50 homes in the draft Plan.</p> <p>Promotion History: AWP's Green Lane site, as outlined in blue on the enclosed Land Ownership Plan, is a key site for provision of services in Wiltshire, and has had recent investment to provide specialist provision of new in-patient bed spaces for clients with mental health / severe learning difficulties. Future planned investment in on the Green Lane campus will provide a Wiltshire-wide safe environment for patients which are subject to review in conjunction with the local constabulary by providing a 'place of safety'. It is in this context the vacant Green Acres site, as outlined in red on the enclosed Land Ownership, was been deemed surplus to future operational requirements by AWP. The site has been vacant since March 2017. The previously developed site is now incurring ongoing holdings costs for AWP, and on this basis, it is considered strongly in the public interest that a new viable use for the site is found as soon as possible.</p> <p>In May 2014 details of the Greenacres site were submitted in response to the Council's call for sites. At a meeting attended by both AWP and NHS Property Services was held at Wiltshire Council's offices in October 2014 It was agreed that a comprehensive approach to the provision of healthcare in Devizes and the disposal of surplus sites owned by AWP and NHS Property Services would be progressed. It was also acknowledged at that time that the Devizes Neighbourhood Plan was too far advanced to address these issues, and that the Site Allocation DPD would be the appropriate plan through which AWP's surplus land assets could be promoted.</p> <p>AWP have progressed a technical evidence base comprising landscape, transport and utility surveys which has informed a draft capacity layout that indicates that the surplus Greenacres site has the potential to accommodate a scheme of up to 54 houses with open space and parking for users of the public right of way.</p> <p>The following information is enclosed:</p>			

	<p>Land Ownership Plan showing the extent of AWP's land ownership (Ref: 03.RevB)</p> <p>Indicative draft layout showing circa 50 units on the former Greenacres site (Ref: 1135/SK012A)</p> <p>Statement of Common Ground: the site owners, AWP, reconfirm their willingness to work collaboratively with Wiltshire Council to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H1: Wiltshire Council to allocate the subject site for circa 50 dwelling units, as outlined in red on the enclosed Site Location Plan (Plan Ref: 03.RevB).</p>
Attached files (Please see Objective)	4715146 / 4715147
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.

Comment ID:	1479	Consultee Mr Roy Pegrum	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128903		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in connection with the above proposal, I know the area well having enjoyed living at the above address for over twenty year. As you may appreciate my house is bordered on three sides by the proposal and I wish to object strongly to the erection of dwellings in this location on ecological grounds.</p> <p>Because of its unique situation we are fortunate to have experienced the pleasure of living close to the surrounding countryside and the wildlife that it supports. We have taken great pleasure in viewing the deer, fox, badger hedgehog and birds and have endured and enjoyed their frequent invasion. Regrettably the loss of such wild life and the land that they rely on would not in its self be considered grounds for removing the above proposal from the WHSAP but evidently the presence of bats could. With this in mind we have been monitoring their presence with the aid of an Echo Meter Touch 2. This device together with an iPad app. detects, identifies and tracks bat movements.</p> <p>In the short period that we have been monitoring, the device has identified fourteen different species of bat. Significantly these include the protected Greater Horseshoe and the very rare Bechstein. All these bats have been tracked while foraging on our land and; significantly; the fields adjoining Framfield. Copies of these records are available for your review and I hope to pass copies to the Environmental Services of Wiltshire Council at Bythesea Road when I can find a medium capable of holding the large files involved.</p> <p>In conclusion the fields adjacent to Framfield are an important area of forage for rare and protected species of bats and the provision of so called 'dark corridors 'would be an inadequate replacement for these natural environments. These fields therefore should not be included in the WHSAP and if they should continue to be so I will repeat my objections at all subsequent stages of the planning process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1480	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Page 19		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Table 4.10 indicates the distribution of housing development for the various community areas. In the case of Warminster, this table shows a shortfall of 14% (262 houses). This figure is made up of the 462 house shortfall shown in table 4.2 of Topic Paper 3, less the allocations for Warminster of 200 houses shown in table 4.6 of the DPD. This shortfall of 462 is a snapshot and will depend on the delivery rate of the West Urban Extension in Warminster. The Core Strategy allocation for this site was set at a quanta 900, although it was acknowledged by Wiltshire during the examination, and confirmed by the Examination Inspector, that the area is much larger than required to deliver 900 homes.</p> <p>As a result, the Core Strategy Examination Inspector in his report did not recommend an additional allocation to meet Warminster's shortfall of the then 317 houses, if the site only provided the 900 quanta.</p> <p>The masterplan for this site (16/01323/MAS) was approved on the 15th June 2016. This masterplan indicated that the allocation was capable of supplying 1550 houses, 893 prior to 2026, justifying the Examination Inspector's and Wiltshire's belief that no additional allocation was required. It is the housing trajectory in this masterplan that has been used in the Wiltshire Housing Land Supply Statement (March 2017) to provide the shortfall figure of 462.</p> <p>A subsequent detailed planning application (17/01463/FUL) from a different developer for the southern part of the site is currently under consideration. The housing trajectory given in this application of 1025 houses by 2026 would result in the shortfall being considerably reduced from 462 to 230. See attached spreadsheet below on page 14 & 15 showing the calculation for these numbers.</p> <p>It should be noted that the 'indicative requirement' figures in the Core Strategy for each community area in a HMA were provided to prevent individual settlements from receiving an unbalanced level of growth and they are just 'an indicative value' and allow for a flexible approach. Wiltshire Council must reassess the Minimum Housing Requirement figures within each HMA based on a consistent methodology outlined in the Core Strategy, particularly for Warminster.</p> <p>Any increase in housing numbers thereafter should be based on an evidence based- approach justifying the approach.</p>				
Attached files (Please see Objective)	4715394				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1481	Consultee Mrs Helen Clemow	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125160		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Salisbury does not have a straightforward road layout due to the fact that there are five rivers crossing through the city, so traffic is already heavily congested around the few bridges that exist. To add over 1000 cars to the already heavy traffic levels seems irrational. The Harnham Gyratory and route down Newbridge Road, which the majority of new residents' cars would need to pass through, can struggle to cope during the rush hour at present with traffic backing up along all of the approaching A roads, as demonstrated by the drive by protest on the 19th September where just 10% of the expected additional traffic, forecast by TRICS data, joined the rush hour traffic and more than doubled the usual time it takes to get from Wilton to Harnham. A new and effective transport strategy for Salisbury is badly needed and should be in place before any new developments of this size are first considered.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1482	Consultee Mr Roy Pegrum	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128903		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in connection with the above proposal, I know the area well having lived at the above address for over twenty years. I wish to OBJECT strongly to the erection of dwellings in this location on the following grounds</p> <p>Sustainability Wiltshire Housing Site Allocation Plan(WHSAP} Community Area Topic Paper - Trowbridge (June 2017} Clause 2.5 refers to Wiltshire Infrastructure Delivery Plan and I draw your attention to five of the seven items listed that have not been considered addressed or implicated (for whatever reason) Extension of primary schools New/satellite secondary schools Additional nursery school places Improvements as part of Trowbridge Transport Strategy Increase in capacity of Trowbridge Primary Care Until any or all of the above have been implemented none of the proposed developments of the WHSAP can be considered sustainable and are therefore contrary to National Planning Policy 156. For all the aforementioned reasons I object to this proposal's inclusion in the WHSA but should it continue I would repeat my objections at all subsequent stages of the planning process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1483	Consultee Mr Roy Pegrum	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128903	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In addition to the above the adequacy of existing services in particular the existing mains drainage that runs through the fields parallel to Lambrok Stream is currently called into question. Whenever the catchment of this drainage system is subjected to sustained heavy rainfall the manholes in these fields overflow with surface and foul water onto the flood plain and contaminate the area. Connecting additional dwellings to this system without a substantial upgrade would be irresponsible.</p> <p>For all the aforementioned reasons I object to this proposal's inclusion in the WHSA but should it continue I would repeat my objections at all subsequent stages of the planning process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1484	Consultee Mr Roy Pegrum	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128903	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in connection with the above proposal, I know the area well having lived at the above address for over twenty years. I wish to OBJECT strongly to the erection of dwellings in this location on the following grounds</p> <p>Proximity to Listed Buildings St. Johns Church and adjacent properties in Church Lane are all Grade 2 Listed. Listing guidelines require nearby developments that are visible from the Listed Buildings to take due regard of the same and protect the setting. (Section 66 of Listed Buildings Act). This proposal is contrary to these guidelines.</p> <p>For all the aforementioned reasons I object to this proposal's inclusion in the WHSA but should it continue I would repeat my objections at all subsequent stages of the planning process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1485	Consultee Mr Roy Pegrum	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128903		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in connection with the above proposal, I know the area well having lived at the above address for over twenty years. I wish to OBJECT strongly to the erection of dwellings in this location on the following grounds</p> <p>Environmental</p> <p>The flood risk associated with the Church Lane fields has already been acknowledged by the Environmental Agency with the land 100-200 metres either side of the Lambrok Stream being rated at HIGH RISK and therefore defined as a flood plain. The Agencies' concerns regarding the irresponsible development in or near flood plains are well known and documented. Any development on or adjacent to such an area would significantly increase run off and reduce the area available for natural absorption, resulting in increased incidents of flooding downstream. This is all covered in the Governments Planning Portal Policy Statement 15 Planning and Flood Risk Annex B Sections B11 increased indirect flooding) and B13 (Additional hard surfacing)</p> <p>I therefore believe that the development of these fields does not take into consideration the requirements of Central Government policies and its relevant agencies.</p> <p>For all the aforementioned reasons I object to this proposal's inclusion in the WHSA but should it continue I would repeat my objections at all subsequent stages of the planning process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1486	Consultee Mr Roy Pegrum	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128903		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in connection with the above proposal, I know the area well having lived at the above address for over twenty years. I wish to OBJECT strongly to the erection of dwellings in this location on the following grounds</p> <p>Contrary to Core Strategy</p> <p>I consider that this development ignores the following basic principles of the agreed Wiltshire's Core Strategy</p> <p>Para 5.146 - adequate education infrastructures should be in place before additional housing is considered</p> <p>Para 5.147 Bullet Point 2 - Priority should be given to Town Centre growth Para 5.147 Bullet Point 7 - Regeneration of Trowbridge central area a priority</p> <p>Para 5.147 Bullet Point 15 - Consideration of constraint of CWS, SSSI's and Ancient Woodlands</p> <p>Core Policy 51 Landscape - Consideration of existing natural features, settlements, settings, separation of natural and manmade features, heritage, important views and visual amenity.</p> <p>For all the aforementioned reasons I object to this proposal's inclusion in the WHSA but should it continue I would repeat my objections at all subsequent stages of the planning process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1487	Consultee Mr Roy Pegrum	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128903		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in connection with the above proposal, I know the area well having lived at the above address for over twenty years. I wish to OBJECT strongly to the erection of dwellings in this location on the following grounds</p> <p>Whilst I acknowledge I have no legal 'right to a view' the loss of existing views; should this development proceed; would adversely affect the residential amenity of the neighbourhood which I believe is a valid objection to a planning proposal.</p> <p>For all the aforementioned reasons I object to this proposal's inclusion in the WHSA but should it continue I would repeat my objections at all subsequent stages of the planning process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1488	Consultee Miss Sarah Lowe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126962		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	2) Wildlife - all sorts of wildlife, including (but not limited to) deer, owls, woodpeckers and bats (including bechstein bats) have been seen and are living in the area, with no where else to go should these plans go ahead. The area is also used by local walkers, dog walkers and joggers, so they would be losing that. Don't build on site H2.2!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1489	Consultee Miss Sarah Lowe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126962		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		3) North Bradley is a village, the area of H2.2 is a part of the parish of North Bradley, not part of Trowbridge. If Trowbridge needs to expand and accept more housing, it should be on land WITHIN Trowbridge and its boundaries, you shouldn't be allowed to move boundaries as it suits to meet targets for the town. Villagers have paid a premium to live in a village, building on this plot of land will lead to the village being lost and turned in to just another part of Trowbridge. It is so sad and unfair on us to take our village away, while other villages are allowed to keep fields as boundaries. Don't build on site H2.2!			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1490	Consultee Miss Sarah Lowe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126962		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		4) Brown field sites - there are so many brown field sites in Trowbridge, either sat empty or with derelict buildings on which haven't been used in years, these should always be filled first. Destroying fields might be cheaper, but is morally wrong. No more fields should be considered until every last centimeter of unused brown field sites in the town have been filled. Don't build on site H2.2!			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1491	Consultee Miss Sarah Lowe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126962		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5) The location itself has been known for flooding. More houses will lead to more pressure on the soil and therefore more flooding, causing no end of issues for new residents and potential new problems for current residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1492	Consultee Miss Sarah Lowe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126962		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		6) The primary school is already full with no ability to expand, adding extra pressures on families to find schools and extra pressure on schools themselves, with village children possibly being unable to get in to their local primary school because demand is too high. Don't build on site H2.2!			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1493	Consultee Mr Nick Parker Chairman	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Page 19		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Table 4.8 indicates the projected 5 Year Housing Land Supply values to the end of the plan period for the various HMAs when the allocations in this DPD are included.</p> <p>The position prior to the allocations in this DPD is shown in table 3.4 of Topic Paper 3. This table shows the 5 Year Housing Supply figures dropping below the minimum 5.25 value towards the end of the plan period. It is for this reason that the DPD made additional allocations to ensure that the 5 Year Housing Supply figure was above the minimum.</p> <p>As a result of the Chippenham DPD examination delay however and subsequent problems with the North and West HMA 5 Year Housing Supply, a number of sites were granted permission that were not included in the Core Strategy allocation. This increased the commitments in this HMA while the Minimum Housing Requirement remained constant.</p> <p>In response to this increase in commitments EBRAG would expect that the 5 Year Housing Supply figure would increase towards the end of the period.</p> <p>The figures 3.4 of Topic Paper 3 are derived from the Housing Supply Statement (March 2017) Appendix 1 which provides a prediction of commitments for the year to the end of the plan in 2026. To calculate a 5 Year Housing Supply however you also need a completion figure for each year and correcting for the data ending at 2026. This spreadsheet shows, rather than dropping as predicted by this DPD, the actual 5 years housing supply for the North and West HMA values would increase towards the end of the plan period. This undermines and negates the reasons used by the DPD to make additional allocations.</p> <p>Wiltshire Council must reassess the Minimum Housing Requirement figures within each HMA based on a consistent methodology outlined in the Core Strategy, particularly for Warminster.</p> <p>Any increase in housing numbers thereafter should be based on an evidence based- approach justifying the approach.</p>				
Attached files (Please see Objective)	4715399				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1494	Consultee Ron Richman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1128958		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This may or may not be the correct way of objecting to the planned housing development on the Hilperton Gap but looking at the forms you have to fill in and the complexity of it all, I've always been a man of few words, but on this occasion I feel I have to voice my concerns. My objections are based on the facts that the town has Brown Field sites standing vacant within Trowbridge and nothing has been done to them, yet this Green Field site seems to have been jumped on as the only piece of land that can be used. Houses need to be built, yes, but until all other Brown Field areas have been exhausted within Trowbridge then I feel compelled to object to this planning application as strongly as I can. I feel WC are going over people's heads to try to get this through and not taking there concerns seriously, so, build on the Brown Field sites first then look at this again.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1495	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Page 40		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The paragraph proposes an additional allocation of 200 houses (East of Dene, Bore Hill Farm, Boreham Road) for Warminster. The Sustainability Appraisal Report Annex 1A 1T Warminster Market Town has not considered the lack of infrastructure to support further development in Warminster.</p> <p>The Wiltshire Infrastructure Delivery Plan 2 for Warminster (dated September 2013) associated with the Core Strategy listed as essential:</p> <ul style="list-style-type: none"> - Health 2011 - 2016 Potential relocation of existing GP practice and improvements to existing practices in the villages. - Education 2016 - 2021 New 2FE primary school and site, preferably to replace Princecroft School, to provide an additional 339 pupil places. - Education 2011 - 2016 Relocation of Kingdown Secondary School to provide an additional 241 pupil places. - Education 2021 - 2026 Extension to existing primary schools in the villages to provide an additional 9 pupil places <p>It further states that the majority of housing on the strategic site of the West Urban Extension will come forward during the middle five years of the plan period. Essential projects phased to come forward during the initial stages of development are either needed to enable the development to proceed, or existing provision is close to or at capacity.</p> <p>The updated version of this document dated December 2016 lists as essential:</p> <ul style="list-style-type: none"> - Education 2021 - 2026 Expansion of existing town primary schools to provide 137 places. - Education 2021 - 2026 Expansion of existing village primary schools to provide 19 places. - Education 2016 - 2021 Site (at least 3.6ha) to colocate additional secondary places within West Urban Extension to provide 309 places. - Education 2021 - 2026 Nursery provision for children aged 0 to school age (to include, based on housing numbers, 56 places for 0 to 2 year olds and 126 places for 3 to 4 year olds). - Health and social care 2016 - 2021 Support development of local primary healthcare facilities. - Emergency Services 2016 - 2021 improvements to (including relocation/ replacement) of Warminster Fire Station. <p>The Core Strategy Wiltshire planned that almost all of these essential facilities would be provided on the West Urban Extension. As of today none of these essential items have appeared on a detailed planning application and therefore no delivery date is available. In fact the situation in terms of health has deteriorated in that of the two doctors surgeries in the town one is closing in October 2017, increasing the necessity of early delivery of primary healthcare facilities.</p> <p>The delivery plan states that Kingdown Secondary school has some surplus places but will be full by 2018. It is not able to expand in its current location as no land nearby is available. The land required for expansion is within the West Urban Extension strategic site.</p>				

	<p>Given this lack of essential supporting infrastructure, it is not sustainable to allocate additional housing to Warminster until the northern part of the West Warminster Urban Extension, where this infrastructure is to be located, has at least reached the planning stage, at which point as calculated previously, additional allocation will not be required.</p> <p>If further housing allocation is made for Warminster, above that currently identified in the Core Strategy, then Wiltshire need to allocate appropriate infrastructure to support the increase. No mention is made of this in this draft plan.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>

Comment ID:	1496	Consultee Mrs P M Daniel	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446038	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Proposed housing on Netherhampton Road I and many others object to this proposal for the following reasons: It would cause even more confusion on this already busy road, which is becoming dangerous now. Because of the 5 rivers the city is exceptional, and can't take another development There is constriction at the Harnham gyratory, and at the end of Wilton Road. For future generations this cannot be allowed to happen. The development at the old army H.Q. in Wilton has caused much more traffic on the Harnham Road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1497	Consultee Mrs P M Daniel	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446038	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Proposed housing on Netherhampton Road I and many others object to this proposal for the following reasons: There are brown sites in the city which could be used; i.e. B.H.S and the building at the end of Castle St.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1498	Consultee Mrs P M Daniel	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446038	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Proposed housing on Netherhampton Road I and many others object to this proposal for the following reasons: The school is already over-crowded.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1499	Consultee Mrs P M Daniel	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446038	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Proposed housing on Netherhampton Road I and many others object to this proposal for the following reasons: It would cause further pollution, which is already high.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1500	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Home Farm (East of the Dene) allocation is proposing locating 100 houses adjacent to The Dene and leaving the southern/south west part of the site undeveloped to preserve the character of the area and significance of surrounding heritage assets.</p> <p>The proposed Home Farm allocation forms part of SHLAA site 603, with the rest being excluded from the allocation in order to protect:</p> <ul style="list-style-type: none"> - Listed buildings in the vicinity, including Bishopstrow House - Bishopstrow Conservation Area - Views from Battlesbury Camp hillfort <p>The only access to the proposed site is from Boreham Road, which will cut through the south/south west site area, thus negating Wiltshire's concern for the southern part of the site.</p> <p>Wiltshire should exclude the joining road area from the allocation and settlement boundary change, thus keeping it outside the settlement boundary but acknowledging the need for access from Boreham Road to the proposed new housing.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1501	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Home Farm (East of the Dene) allocation is proposing locating 100 houses adjacent to The Dene and leaving the southern/south west part of the site undeveloped to preserve the character of the area and significance of surrounding heritage assets.</p> <p>The proposed Home Farm allocation forms part of SHLAA site 603, with the rest being excluded from the allocation in order to protect:</p> <ul style="list-style-type: none"> - Listed buildings in the vicinity, including Bishopstrow House - Bishopstrow Conservation Area - Views from Battlesbury Camp hillfort <p>The only access to the proposed site is from Boreham Road, which will cut through the south/south west site area, thus negating Wiltshire's concern for the southern part of the site.</p> <p>Further incorporate the remaining area of Site 603 into the Bishopstrow Conservation Area, which borders the site, to prevent exploitation by speculative developers in the future.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1502	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG) Person ID: 706891		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Further, EBRAG consider's that changing the settlement boundary to include the area of the road from Boreham Rd to the development site in the allocation will only encourage developers to keep applying for planning permission for the remaining land of Home Farm in the future. The total area of Home Farm is part of the current speculative planning application 16/ 10502/FUL Wiltshire should exclude the joining road area from the allocation and settlement boundary change, thus keeping it outside the settlement boundary but acknowledging the need for access from Boreham Road to the proposed new housing.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents. EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).				

Comment ID:	1503	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Council's Strategic Flood Risk Assessment (SFRA), thereby managing and reducing risk of flooding throughout Wiltshire</p> <p>The NPPF and SFRA require all selected development sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP).</p> <p>Wiltshire's SFRA identifies certain areas that are at higher flood risk and requires them to undergo these additional flood risk assessments. These areas are Salisbury, Chippenham, Trowbridge and Warminster. In addition, the Core Strategy and associated Sustainability Appraisals highlighted these sites, under guidance from the Environment Agency (EA).</p> <p>The draft DPD proposes selection of 3 new housing sites in Warminster. The selection of these sites has clearly not followed the national planning process nor does it make any reference to the correct national and local flood risk management policies outlined in Policy 67. Following further NPPF guidance, therefore, the 3 new sites selected for Warminster should be rejected, until the correct procedures and processes are completed.</p> <p>Wiltshire should reject the selection of the 3 new sites within Warminster until a sequential flood test based on the details in the Wiltshire SFRA is undertaken. This process has been completed for other identified high flood risk towns in Wiltshire.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1504	Consultee Mr John McGarry Person ID: 402734	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocations Plan is UNSOUND in respect of H3.1 Netherhampton Road in that the traffic implications render it UNSUSTAINABLE. The following pages are a detailed analysis of the Sustainability Appraisal Report indicating where it is misleading or in error, with suggestions for amendment.</p> <p>Finally I include a paragraph on the strategic issues in which I indicate why this allocation is not only unsustainable but strategically flawed.</p> <p>STRATEGIC ISSUES</p> <p>Wiltshire Council have sought to justify the need for the Netherhampton Road site on the grounds of difficulties experienced in relocating commercial activities from the Churchfields site, which was intended to release space for additional housing in the City Centre. Difficult or not, strategically this objective must be pursued.</p> <p>In the long run, there will eventually be an over-riding need to re-route the A36 Southampton-Bristol trunk road away from Salisbury Ring Road. This will inevitably be routed to the north of the City, the southern route having been discounted on environmental grounds.</p> <p>Commercial development should therefore be concentrated to the north of the City, forming a cluster with Porton Down, Boscombe Down, High Post and Solstice Park in Amesbury, where businesses will ultimately benefit from good access to this new trunk road.</p> <p>There is ample space at Old Sarum, Long Hedge and beyond for such development.</p> <p>In the shorter term, access to the national road network via the A303 is much better from the north of the City than elsewhere in Salisbury. The failure of Harnham Business Park to attract new businesses in over 10 years is clear evidence that this is not regarded by business as a suitable location for commercial activity.</p> <p>How then does it make sense to allocate a huge new greenfield site for residential development on the south side of the City, with the worst possible road communications to the current and developing commercial zones?</p> <p>Salisbury has a history of strategic blunders. Let us not add another.</p> <p>The Site Allocations Plan would be rendered sound by deleting the Netherhampton Road site from the Plan.</p> <p>Detailed amendments to the Sustainability Appraisal to correct errors and misleading statements as follows:</p> <p>The following are my detailed comments on the Wiltshire Council Housing Site Allocations Plan Sustainability Appraisal Report prepared by Messrs Atkins in respect of Site H3.1(S1028) Netherhampton Road.</p> <p>SA Objective 1 Summary (Page 95)</p> <p>Line 8 reads: 'Significant in-combination effects may make mitigation for phosphate challenging at this location. Hence Line 9 should be amended to delete 'moderate' and read: 'Overall, adverse effects are considered likely against this objective and mitigation is considered problematic'.</p> <p>SA Objective 2 Summary (Page 97)</p> <p>Lines 1-2 should be amended to: 'The site is situated on the South West of the City, partly outside Salisbury City boundary and is not considered to be within a reasonable walking/cycling distance of the City centre.</p>				

Line 3-4 should be amended to: 'Therefore development of this site will lead to a loss of Best and Most Versatile agricultural land.'

Line 7 should be amended to: 'Overall this site is considered likely to have adverse effects against this objective and mitigation would be problematic'.

SA Objective 3 Summary (Page 98-99)

Lines 6-7 should be amended to: 'Overall, given the anticipated size of the development, the need for water capacity appraisal and location within the Hampshire Avon river catchment, adverse effects are considered likely against this objective'.

SA Objective 4 (Pages 99-101)

Much of this section concentrates on Air Pollution, and in the medium to long term, I accept that electric propulsion is likely to mitigate nuisance from this aspect.

However, the statements on noise pollution and other effects of traffic movement are highly contentious. There are currently around 2000 dwellings whose sole or primary road access to Salisbury is via Netherhampton Road/Harnham Road. These dwellings are served by a 15-minute bus service.

If both sites on Netherhampton Road (S1027 and S1028) are developed this adds 840 dwellings, and hence potentially an additional 42% in traffic movements.

The Highways Agency Design Manual for Roads and Bridges classifies Harnham Road as (Urban All purpose) UAP4 with a peak capacity of 900 vehicles per hour in each direction. Current morning and evening flows exceed 700 vehicles per hour, and hence there is little room to accommodate any major increase.

At the time of the EIP of the South Wilts Core Strategy in 2011, when a development of around 400 dwellings was proposed, the above analysis was submitted to the Planning Inspector and was not challenged by Wiltshire Council. In my view, the inability of Wiltshire Council to identify any realistic mitigation measures for Harnham Road and Netherhampton Road was the primary reason for the withdrawal of this site. If plans for 400 dwellings were unsound, how much less so are plans for 840 dwellings?

The response to Question 2 states: 'Development of the site will lead to long term (occupation) impacts associated with noise, light pollution, odour and vibration. Mitigation measures to limit such impacts will need to be developed and implemented'

Thus far we have seen no evidence whatsoever that any significant mitigation is possible, indeed it is apparent that the existing road structure is quite incapable of supporting this development.

Hence the last line of the summary should be amended to read: 'Overall, the additional traffic generated by this site will have a damaging effect on the quality of life of the existing residents of Harnham and Netherhampton, and it is likely that increased congestion will impede economic activity in the City as a whole. Unless and until a traffic plan is drawn up to demonstrate how the additional volumes can be accommodated, this site should be withdrawn.'

SA Objectives 5a and 5b (Pages 101-103)

No comment

SA Objective 6 (Pages 103-104)

No comment, except to stress the various qualifications in the appraisal e.g. 'Assessment and preservation in situ would be required', 'The extent of housing development on this site may need to be reduced ...'.

SA Objective 7 (Pages 104-107)

The Appraisal twice refers to it being adjacent to Harnham Business Park, presumably to imply that the area is already developed. Harnham Business Park has a single occupant (Bookers Cash and Carry) which generates low traffic volume and negligible noise, and is situated well

below the ridge line. It has attracted no new tenants for upwards of 10 years.

The summary should be amended to delete the irrelevant reference to Harnham Business Park. Also delete the word 'fairly' so that line 2 of the summary reads: 'This is a visually sensitive location'

The final line should read: 'Overall it is considered that development of this site would have adverse effects against this objective'.

SA Objective 8 (Pages 107-108)

We do not dispute that a site of this size is capable of providing a large number of houses, we simply claim that it is not deliverable in this location.

We note that the summary refers to 'approx. 1195 dwellings'. The Site Allocations Plan refers to 740 dwellings and the summary should be amended accordingly.

SA Objective 9 (Pages 108 - 109)

Question 4 response states that there is public transport nearby. I have searched the internet and the nearest regular service I have found is the Reds r5 route, the nearest stop being an estimated 800m away near the junction of Netherhampton Road and Middle Street.

The only realistic access to Salisbury District Hospital is via Netherhampton Road/Harnham Road, which is destined to be hugely congested if this development goes ahead.

With the exception of Sarum Academy, the site is just about as far away from the other secondary schools at Laverstock as it is possible to get within the City conurbation.

We note that the summary again refers to 1195 dwellings, as well as a 2-form intake primary school and other community facilities. This will further increase traffic volumes, and we repeat that this plan is simply not deliverable in this location.

SA Objective 10 (Pages 110-111)

This is the major issue affecting this planned development, and this part of the Appraisal is an absolute travesty, being grossly misleading and in my view professionally sub-standard.

The response to question 4 states specifically that 'the site is not considered to be within walking distance of most services and facilities in Salisbury' and that 'a development of this size will inevitably increase private car use and travel movements'.

It concludes that 'development of this site must be accompanied with (sic) significant improvements in walking/cycling/public transport infrastructure and highways infrastructure to allow additional traffic movements to be mitigated'.

This bland assertion ignores the scale of the development. The development (at 840 dwellings including S1027 and S1028) represents an increase of about 42% above the existing housing served by Netherhampton Road/Harnham Road. If the figure becomes 1195 dwellings, the increase is nearly 60%.

Existing housing is served by a 15-minute bus service, and many parts are within walking distance of the City centre, and most are within easy cycling distance. Also, a significant proportion is occupied by the elderly (Norfolk Road, Brympton House etc) where the proportion of car ownership and use is likely to be lower.

Accordingly, it is likely that car ownership and use for the new development, considering its greater distance from Salisbury, will be greater pro rata than for existing housing.

Faced with this analysis, the final line of the summary concludes:-

	<p>'Overall, the site is considered as having minor adverse effects against this objective'. Whatever the assessment of adverse effects, in no sense are they 'minor'.</p> <p>I would submit that this section of the Appraisal totally fails to address the major traffic implications of this development, and should therefore be withdrawn and completely rewritten after a proper analysis of likely traffic numbers, the capacity of the existing road network, and an assessment of the impact on the local and wider community. This would allow a proper transport plan to be developed, without which this site allocation is unsustainable.</p> <p>SA Objective 11 (Page 111) SA Objective 12 (Pages 111-112)</p> <p>I fully support plans for a significant increase in housing in the Salisbury area, which is necessary both for demographic reasons, and to support local economic growth.</p> <p>However, I believe that my notes above demonstrate that the limitations of the road Infrastructure, together with a number of other major concerns incapable of satisfactory mitigation, render this site allocation unsound.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Salisbury City and Wiltshire Councillors are inhibited from voicing opinions on such plans due to their subsequent involvement in the planning process.</p> <p>This particular plan is not only unsustainable, it is almost universally opposed by the residents of Harnham and Netherhampton. It is important that informed residents have to opportunity to oppose this folly, at the examination if necessary.</p>

Comment ID:	1505	Consultee Mrs P E Clarkson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 613/248			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site 613/248 should be considered for retirement housing and starter homes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1506	Consultee Mr Philip Carter	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129122		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I wish to comment on the proposal to increase the number of houses, through the site allocation plan from 10 by a further 40. I supported the original planning application with a proviso that the number was not subsequently increased. Now that there is a proposal to build a further 40, I wish to register my objection for the following reasons:</p> <p>There appears to be a potential oversupply of about 100 houses in the Malmesbury area, together with an overall over supply excess of 2000 houses within North and West Wilshire. Given this prediction, how can a further 40 house in Crudwell be justified on the basis of need, which has not been identified?</p> <p>The County strategy leads us to believe that development in villages , both large and small, will be limited to meet the housing needs of settlements, and to improve employment opportunities, services and facilities. Apart from the lack of need, strategic or otherwise, the basic infrastructure in the village , which is already stretched beyond its designed capacity, will be unable to cope. The drainage system is inadequate, and the village has suffered from severe flooding in the last few years, and the additional building will add significant risk from run off water. The school is full and over subscribed, and the road serving the site is but a narrow country lane.</p> <p>I support the current plan to build the 10 houses, and further proposals for more houses, should not be considered until the village has submitted, and had accepted, its Neighbourhood Plan. It is important that the village has a voice in its future development.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1507	Consultee Backhouse Housing Ltd	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1129123	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A.58	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2: outline planning permission was granted by the Council on 28th February 2017 for a scheme of 58 No. dwellings and associated works following the demolition of the existing hospital buildings.</p> <p>The existing settlement boundary and allocation on part of the site, as carried forward from the West Wiltshire District Plan 1st Alteration (2004) into the adopted Core Strategy (2015) does not include the whole former Westbury Hospital site. It is submitted that the settlement boundary for Westbury should be amended to make provision for the housing committed under planning permission 15/11604/OUT. This also represents a logical rounding-off of the settlement boundary.</p> <p>We can confirm that Backhouse Housing Ltd are committed to taking forward the implementation of the approved outline planning permission. A reserved matters planning application will be submitted in November 2017. It is anticipated that the site will be fully developed within 2-3 years, i.e. no later than April 2020.</p> <p>Annex A, Westbury proposals map: the settlement boundary to be amended as per the red line on the enclosed Site Location Plan (Ref: AC0107_1001).</p>				
Attached files (Please see Objective)	4715806 / 4715807				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1508	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>EBRAG objects to the proposed Home Farm (East of Dene) allocation for the following reasons: Development Principles (Wiltshire Core Strategy CP1) The underlying principles of the Wiltshire Core Strategy seek to manage future development to ensure that communities have an appropriate balance of jobs, services and facilities and homes. The strategy recognises that previous growth hasn't always been delivered in a proportionate manner, whereby housing is delivered in settlements where there are insufficient employment opportunities leading to out-commuting. This is the main reason why the West Urban Extension is a mix of housing, employment land, primary school, local amenities, etc. This allocation is purely a housing development and does not meet the principles of the Core Strategy in providing balanced facilities that are needed for a self-contained community. EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector. Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents. EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1509	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The allocation does not provide additional employment area and so relies on the employment area being developed to support the needs of the West Urban Extension. EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector. Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents. EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).				

Comment ID:	1510	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council and Warminster Town Council have both recognised that Warminster is unusual in that most residents commute out of town for work. The main towns for work near Warminster are Bath, Frome, Westbury, Trowbridge and Salisbury. With the exception of Salisbury, all of these would involve households from this site crossing Warminster Town Centre. It therefore will contribute to Warminster's current cross town centre traffic problems and Copheap, in order to reach the new employment area on the West Urban Extension or go on towards Bath, Frome, Trowbridge and Westbury.</p> <p>EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1511	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Housing Need</p> <p>Wiltshire's documentation now indicates that Warminster is 468 houses short of its target. The underlying reason for this shortfall has been the necessary delay in designing solutions for the problems associated with the West Urban Extension development. Problems particularly associated with Warminster include secondary education places, flooding, pollution of the River Wylye, traffic, recreation, green buffer. Faced with these problems, it was correct for Wiltshire to directly involve the people of Warminster, especially those most directly affected in the West, in the discussions as to how to develop the West Urban Extension. Time is required to provide the additional facilities needed to support development in Warminster and therefore the proposed rate of development on the West Urban Extension is the maximum possible given these constraints.</p> <p>The Home Farm site does not provide any additional facilities and so rather than increase the overall number of houses completed, it would limit the number that could be immediately developed on the West Urban Extension in order not to break supporting infrastructure.</p> <p>EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1512	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>River Wylfe</p> <p>At a recent Wiltshire Council 'Our Community Matters' event, one of the items that was discussed was the pollution problems associated with the River Wylfe. Recognising that the River Wylfe is a SAC, and as such is afforded the highest protection under law, EBRAG is extremely concerned by the comments from Wiltshire Council's Ecology Officer (See Below).</p> <p>These comments indicate that if this development, in conjunction with the West Urban Extension, proceed there will be significant amounts of pollution discharged in the river. Given that the West Urban Extension is the site selected in the Core Strategy for Warminster, it would not be appropriate to hinder development by also granting permission for this application.</p> <p>Wiltshire Council's ecology officer- "River Avon SAC - The development would presumably discharge to Warminster sewage works (STW). This STW discharges into the River Wylfe, which is part of the River Avon SAC, a European protected site, which has nationally agreed targets for its water quality. The targets are being widely breached across the catchment for phosphorus. As a result the Environment Agency and Natural England have therefore published a Nutrient Management Plan to demonstrate how water quality will be improved over the next few years to ensure the targets are met. However, it is currently recognised there is a high risk that the plan will not deliver its objectives for the upper Wylfe (and lower Avon sub-catchments. The Council is therefore not able to approve planning applications that would discharge to Warminster STW, where they would take the quantum of development above that forecast in the Wiltshire Core Strategy.</p> <p>Permitted and pending applications currently exceed the Core Strategy allocation and this places uncertainty in the short to medium term for further residential housing applications in the Warminster catchment. The Council is working with Wessex Water, the EA and NE to undertake further modelling of housing growth scenarios and identify the scope for measures that would offset additional forecast phosphate.</p> <p>This situation will have implications for the current pre-application site.</p> <p>Optimistically the matter could be resolved within the next year. However, it seems more likely that significant further growth at Warminster may be delayed until after 2020 when advanced phosphate stripping technologies may be available for the STW.</p> <p>EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you	EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development				

consider it necessary to participate at the oral part of the examination?

proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.
EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).

Comment ID:	1513	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding</p> <p>The site is subject to ground water flooding issues and a large part of the site is subject to surface water flooding issues. Many instances of flooding have been reported to Wiltshire Council by residents of Grange Lane over the past few years. The allocation is within flood zone 1 in relation to fluvial flood risk. The recent review of 'The Winter Floods of 2015/2016 in the UK' brings together both river flow and meteorological data in an analysis of the events that led to extensive river flooding. This report considered the three months of 'remarkably persistent and exceptionally mild cyclonic' activity which, along with Storm Desmond, included the major storms of Abigail, Frank and Gertrude. Current speculation is that the flood risk is increasing due to climate change and there are trends towards higher river flows over the last five decades, especially in western Britain. Although this flooding was worse in the north of England, EBRAG has reported to Wiltshire and the EA concerns over flooding on this site, Bishopstrow Village, Sutton Veny roundabout and Grange Lane. EBRAG remains very concerned that if this development was to be allowed, a period of persistent rain would not only cause this site to flood, but also increase significantly the risk of flooding to adjacent properties and surface water discharge into the River Wylye, endangering properties down stream. EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector. Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents. EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1514	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Access & Traffic</p> <p>The proposed access from this site is onto the Boreham Road, which has a speed limit of 30 mph at this point. Local residents witness speeds of traffic in both directions significantly higher and consider there is a high risk of accidents happening at the proposed junction. The matter is made worse as traffic flowing from Warminster towards Salisbury needs to negotiate a blind bend before meeting the proposed junction within 200 metres. All local residents close to the proposed entrance consider Boreham Rd to be at its most dangerous on this bend due to lack of clear sight and non observance of speed limits. The Wiltshire traffic officer was not at liberty to comment on the bend merely the splay lines as defined by national policy.</p> <p>EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1515	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Environment</p> <p>This site was considered for development during the West Wiltshire District Plan and the examiner described the site as – "I saw that the land mostly comprises arable fields, with similar fields to the north, together with a few cottages and other houses (some set in trees) and bounded by lanes or roads, to the east, west and south. Although there is urban development immediately to the west (across Grange Lane), the area has a pleasant and obviously rural appearance and is very much on the edge of Warminster.</p> <p>From my observations from local footpaths to the north, west and east of the area and from Battlesbury Hill, I consider that the land relates well in visual terms to the open countryside to the north and east, forming an integral part of the countryside east of the town. I accept that a high stone wall and cottages fronting Boreham Road impact on any meaningful visual relationship with the countryside to the south, other than when seen from the Hill top. However, in view of the open-ness of the land and its linkage with other open land to the east and north (and especially Battlesbury Hill), I consider that the town policy limit hereabouts should be drawn along the eastern edge of the denser development fronting The Dene, St George 's Close and (the southern part of) Grange Lane."</p> <p>EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1516	Consultee Mr Nick Parker Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		East Boreham Residents Action Group (EBRAG)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The character of this site has not changed since this time and EBRAG further agrees with Wiltshire's Conservation Officer who reported on speculative development 16/10502/FUL –</p> <p>The development of this site is extremely problematic in terms of the potential adverse impact the development would have on the character of the area and the setting of designated heritage assets, principally Bishopstrow House, The Cotes and the Bishopstrow Conservation Area. Irrespective of the quality of the development or design of the individual units, it is difficult to see how development of this area would make "a positive contribution to local character and distinctiveness" of the area (para 126 of the NPPF).</p> <p>Core policy 58 also requires that 'development should protect, conserve and where possible enhance the historic environment '.</p> <p>My view is that this proposal would fail to protect or conserve.</p> <p>EBRAG concludes that Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after a long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, for development within Warminster. This site can take the perceived increase in housing numbers if Wiltshire disagree with the EBRAG arguments/representations earlier in this document.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>EBRAG represents the views of the East Boreham residents as a community association concerned with ensuring that development in and around East Boreham is sustainable and in keeping with the local heritage assets. Re-established in 2012 to oppose a speculative development proposal, which subsequently became a speculative application, EBRAG has an active committee of 10 persons, a website, database of some 400 concerned residents and regularly keeps the community updated on relevant planning information through the internet, press, social media, public meetings and hardcopy drops to some 1,000 residents.</p> <p>EBRAG would like to represent the views of the community at any public hearing concerned with development on East of Dene (known locally as Home Farm) and Boreham Road (known locally as Spurt Mead).</p>				

Comment ID:	1517	Consultee Sian Burke-Murphy Person ID: 1132949	Agent Mr Stuart Miles Person ID: 1129139	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1 Development Planning and Design Services Ltd is instructed to make representations on the draft Wiltshire Housing Site Allocations Plan on behalf of the Crudwell Neighbourhood Plan Steering Group.</p> <p>1.2 In essence, the grounds of objection are that the emerging Crudwell Neighbourhood Plan is the appropriate document in which to identify the level of local need for new housing at Crudwell, and to determine the best location to meet any identified need.</p> <p>1.3 Crudwell Parish Council has put in place appropriate mechanisms by which to produce the Crudwell Neighbourhood plan.</p> <p>1.4 Sufficient homes are or will be delivered in both the North and West Wiltshire HMA and the Malmesbury Community Area to meet the strategic housing requirement, so there is no strategic justification for Wiltshire Council to allocate housing at Crudwell.</p> <p>1.5 On that basis, the proposed allocation at Ridgeway Farm, Crudwell (site H2.13), should be deleted.</p> <p>Deletion of H2.13 Crudwell.</p> <p>3.1 There is no need to allocate any sites in Crudwell when Crudwell has begun its neighbourhood plan.</p> <p>3.2 Documents released to support the Housing Site Allocations Plan note that housing sites will only be allocated by Wiltshire Council where there is a "strategic priority" to do so.</p> <p>3.3 When past completions are combined with deliverable commitments, the Housing Site Allocations Plan results in an oversupply of 624 dwellings across the North and West Wiltshire HMA, or 2,710 dwellings when forecast windfalls are included. If the indicative residual requirement was met for each community area town and each community area remainder, this oversupply increases to 2,198 dwellings excluding windfalls, or 4,284 dwellings including windfalls.</p> <p>3.4 The Crudwell allocation is the only allocation proposed in the Site Allocations Plan in the Malmesbury Community Area. Without it, when completions are combined with deliverable commitments, there is still an oversupply of 60 dwellings in the Community Area. On that basis, there is no strategic priority to justify Wiltshire allocating any sites at Crudwell, either from an HMA or a community area point of view.</p> <p>3.5 Crudwell is designated as a large village in the Wiltshire Core Strategy. Core Policy 1 limits housing in large villages to that required to meet local needs.</p> <p>3.6 The neighbourhood plan is the best place to determine the level of local need for new housing, and the Neighbourhood Plan Steering Group plans to begin this work in the very near future.</p> <p>3.7 The need for new homes will then be considered against the various constraints in and around the village. Early work undertaken to inform the emerging Neighbourhood Plan, and an analysis of representations made to the various proposals for development at Ridgeway Farm, suggest that there are infrastructure capacity issues, along with other constraints that should inform decisions about new housing at Crudwell. These include:</p> <ul style="list-style-type: none"> - the ability of Crudwell CE Primary School to expand to accommodate additional demand, considering its constrained location within a conservation area; 				

	<ul style="list-style-type: none">- flood risk and drainage capacity issues, particularly bearing in mind that a large proportion of the village is at risk of either fluvial or surface water flooding, or both;- sewerage capacity;- highways capacity and safety;- impact of development on the conservation area;- impact of development on wildlife and landscape. <p>3.8 The Crudwell Neighbourhood Plan can work through these issues and constraints, and consider any local housing need in this context to come up with a plan that is supported by the local community.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure that the detail of the case is put to the examiner.

Comment ID:	1518	Consultee Sian Burke-Murphy Person ID: 1132949	Agent Mr Stuart Miles Person ID: 1129139	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2.0 Housing Requirement Calculations</p> <p>2.1 The analysis below will demonstrate that the Site Allocations Plan will result in an oversupply of dwellings in the North and West Wiltshire Housing Market Area, and in the Malmesbury Community Area.</p> <p>2.2 Crudwell is defined in the Wiltshire Core Strategy as a large village, in which new housing should be limited to meeting local needs. In this context, the documentation produced alongside the Site Allocations Plan makes it clear that Wiltshire Council will only allocate new housing sites where there is a strategic priority to do so. In the context of paragraph 47 of the NPPF, there is no housing land supply problem in the HMA, so there can be no strategic priority to allocate additional housing at Crudwell.</p> <p>Housing Market Area</p> <p>2.3 The housing requirement for Wiltshire between 2006 and 2026 is set out in Wiltshire Core Strategy Core Policy 2. This explains that 42,000 dwellings are required across Wiltshire, and 24,740 dwellings are required in the North and West Wiltshire Housing Market Area (HMA).</p> <p>2.4 Table 1 of Wiltshire Council's Housing Land Supply (Update), Base Date April 2016, published March 2017, shows that 11,756 dwellings were completed in the HMA by 31 March 2016. Table 3.2 of Topic Paper 3: Housing Land Supply, June 2017, released alongside the Housing Site Allocations Plan, estimates that a further 847 dwellings were completed in the year to 31st March 2017, resulting in 12,603 completions by March 2017. This leaves a residual requirement of 12,137 dwellings to March 2026.</p> <p>2.5 Table 4.2 of Topic Paper 3 shows that 11,566 of this residual requirement are committed, meaning that an additional 571 dwellings need to be found across the HMA.</p> <p>2.6 Figure 11 of the Site Allocations Plan shows that 1,195 dwellings are proposed to be allocated in the HMA via the Site Allocations Plan, resulting in an oversupply of 624 dwellings, or 2,710 dwellings when windfalls are included.</p> <p>2.7 However, the premise behind the Housing Site Allocations Plan is that the indicative requirement set out in the Core Strategy should be met for each geographical area in Core Strategy table 1. This is the basis of the indicative residual requirement set out in table 2.2 of the Malmesbury Community Area Topic Paper and table 3.1 of Topic Paper 3, and this is an argument that a developer will make when promoting housing in community areas and sub-areas where the table 1 numbers are not met.</p> <p>2.8 Table 4.2 of Topic Paper 3 indicates that, if this indicative requirement for each area in Core Strategy Table 1 (the "Indicative remaining requirement (quoted)" in table 4.2), were delivered, then 2,769 additional dwellings will be delivered, i.e. 2,198 dwellings more across the HMA than is required.</p> <p>2.9 There is no need to do this when sufficient homes will be delivered across the HMA, according to Wiltshire Council's own numbers. Paragraphs 5.5 to 5.9 of Topic Paper 3 refers to Neighbourhood Planning. Relevant extracts are repeated below:</p> <p>5.6 "... where neighbourhood plans have reached the examination stage, the Council has not sought to identify further housing sites. Progress on neighbourhood planning in other areas of the County has also been kept under review as preparation proceeds. How the Plan interacts with particular Neighbourhood Plans is explained in individual Community Area Topic Papers. Plan preparation thus serves to support neighbourhood</p>				

plans already in preparation; and allow appropriate opportunity for dialogue with communities, who may be considering the preparation of such plans, to articulate their views on how settlements should grow.”

5.7 “However, it is recognised that in certain locations (particularly higher order settlements such as Principal Settlements, Market Towns and Local Service Centres) there may well be a need for the Council to take a strategic lead, by identifying sites to ensure that sufficient land is made available to maintain supply and market choice.”

5.8 “Equally, where neighbourhood plans are being developed that do not allocate sites for housing despite there being a requirement to be met in an area then, again, the Council may need to identify sites at those locations.” (DPDS emphasis)

2.10 Equally, Topic Paper 2: Site Selection Process Methodology, June 2017, refers to Neighbourhood Planning in paragraphs 3.5 to 3.10. This includes the following extracts:

3.6 “The Council supports passing direct powers over planning to local communities as a part of building up the resilience of local communities.”

3.8 “It is only necessary for this Plan to allocate land for housing development where it is a strategic priority to do so. WCS Core Policy 1 proposes that development at Large Villages should be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Unless there is a strategic priority to deliver the homes needed in an HMA, then the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process.” (DPDS emphasis)

2.11 Paragraph 4.10 of Topic Paper 3 notes that the housing requirement across the HMA is a minimum figure. This is noted and accepted, but the allocations proposed in the Housing Site Allocations Plan would result in substantially more dwellings in the HMA than are required, especially when windfalls are included.

2.12 Crudwell has begun to produce a neighbourhood plan. The area has been designated, a steering group has been set up and initial evidence gathering will begin soon. Crudwell is classified as a large village, not a Principal Settlement, Market Town or a Local Service Centre, so there is no need for Wiltshire Council to take a strategic lead by identifying any housing sites at Crudwell.

2.13 On the basis of the housing numbers set out in the Site Allocations Plan there is also no “strategic priority” in terms of the North and West Wiltshire HMA for Wiltshire Council to allocate any housing sites at Crudwell in advance of the neighbourhood plan. The Crudwell Neighbourhood Plan Steering Group wholeheartedly agrees that “the most appropriate means to assess local needs and plan growth at each Large Village is through the neighbourhood planning process.”

Malmesbury Community Area

2.14 Wiltshire Core Strategy Core Policy 2 refers to a more detailed distribution of the 42,000 dwellings required across Wiltshire and 24,740 dwellings required across the North and West Wiltshire HMA. This indicative housing requirement is set out for each settlement and community area in Table 1 of the Core Strategy.

2.15 Crudwell lies in the Malmesbury Community Area, in which 1,395 dwellings are anticipated. This includes 885 in Malmesbury town, and 510 in the “Malmesbury remainder”, which includes Crudwell.

2.16 Figure 14 of the Site Allocations Plan and Table 4.2 of Topic Paper 3: Housing Land Supply indicate that 560 dwellings have been completed in Malmesbury up to March 2017, and that 455 dwellings remain available as developable commitments. This suggests that Malmesbury is likely to accommodate 1,015 new dwellings between 2006 and 2026, or 130 more than the indicative requirement.

2.17 Of the 510 dwellings indicatively required in the Malmesbury remainder area, 336 were built by March 2017 and 104 are developable commitments. This totals 440 dwellings.¹

2.18 While the total completions and current commitments in Malmesbury remainder is less than the 510 dwelling requirement, as a result of the oversupply at Malmesbury, there is also an oversupply across the community area of 60 dwellings (or 100 dwellings based on Figure 14 of the Site Allocations Plan).

2.19 Core Strategy Core Policy 1 notes that:
“Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.”

2.20 Crudwell is defined as a large village. The above analysis shows that there is no strategic priority for Wiltshire Council to allocate any housing sites at Crudwell in advance of the forthcoming neighbourhood plan.

2.21 In this context Core Policy 1 is clear; development at Crudwell should be limited to that needed to help meet Crudwell’s housing needs. The

neighbourhood plan will determine the level of this local need and the best way to meet that need. Rest assured that, if additional housing sites are required, Crudwell Neighbourhood Plan Steering Group understands that it will need to identify a site or sites to meet this need.

Comparison with other settlements

2.22 The table below demonstrates the imbalance between the high level of growth proposed for Crudwell when compared with other comparable settlements. It summarises the proposed level of growth resulting from allocations in either neighbourhood plans or Wiltshire's Site Allocations Plan for each of the local service centres and large villages in the Malmesbury Community Area, along with the neighbouring Royal Wootton Bassett and Cricklade Community Area for comparison. The Dwellings in 2011 is based on the dwelling numbers by built up area from NOMIS.

2.23 The Royal Wootton Bassett and Cricklade settlements need to identify no new allocations on the basis that sufficient dwellings are either completed or committed in both Royal Wootton Bassett and in the remainder of the Community Area.

2.24 In the Malmesbury Community Area, Ashton Keynes has a relatively low level of growth proposed in its made neighbourhood plan. Sherston has no allocations because it lies within the Cotswolds AONB. Oaksey has no allocations because no SHLAA sites were considered appropriate. Great Somerford has a high proposed level of growth but this is based on an advanced neighbourhood plan where the local community determined that this was appropriate.

2.25 The only reason that Crudwell has an allocation in the Wiltshire Site Allocations Plan is because it happens to have a site included in the SHLAA that is developable.

2.26 It is not appropriate for a level of growth of over 15% to be imposed on Crudwell by Wiltshire Council when the local community will soon determine what development is needed to meet local housing needs, and will then determine how best to meet that local need.

2.27 Additionally, from a planning first principles point of view, the table above illustrates the illogicality of Wiltshire Council's position. As noted above, sufficient dwellings have or will be provided in the North and West Wiltshire HMA, in the Malmesbury Community Area, and in the Royal Wootton Bassett & Cricklade Community Areas to meet Core Strategy requirements. The only difference between housing supply in the Malmesbury and Royal Wootton Bassett & Cricklade Community Areas is that the oversupply in the latter is in both Royal Wootton Bassett and the remainder of the Community Area. In the Malmesbury Community Area the oversupply is focussed on Malmesbury, which is the most sustainable settlement in the community area anyway.

2.28 As a result of this particular distribution of development in the community area, for which, it should be re-emphasised, the housing requirement is only indicative, Crudwell, a large village with 260 dwellings, is due to receive allocations resulting in over 15% growth, when Cricklade, a local service centre with 1,737 dwellings, and Lyneham and Purton, large villages with 1,769 and 1,492 dwellings respectively, are due to receive no new housing allocations.

2.29 Cricklade, Lyneham and Purton all have a greater level of facility provision than Crudwell and are therefore more sustainable, and more able to accommodate growth. While the Crudwell Neighbourhood Plan Steering Group does not wish to be seen to be suggesting additional growth elsewhere, this simply emphasises that there is no strategic imperative for Wiltshire Council to allocate any housing sites in Crudwell, particularly when the Crudwell local community will soon consider this via its neighbourhood plan.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To ensure that the detail of the case is put to the examiner.

Comment ID:	1519	Consultee J&T Beaven	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1129146	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Holt Tannery Site, The Midland, Holt		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2: the Holt Neighbourhood Plan (HNP) makes provides explicit support for the redevelopment of the Tannery site for housing and employment, and does the adopted Core Strategy. However, neither development document amended the settlement boundary and Area of Opportunity extent that was originally, an arbitrarily, drawing through the middle of the Tannery Site, as shown on the Holt proposals map in the West Wiltshire District Plan 1st Alteration.</p> <p>It is submitted that the draft Plan should amend the Holt settlement boundary to include the whole of the Tannery Site as shown outlined in red on the enclosed Site Location Plan (Ref: 1711 AP(0)00A).</p> <p>Promotion History: following the withdrawal of an initial scheme submitted by a land promoter (Ref: 16/01306/OUT) in April 2017, the landowner has entered into a subject to planning contract with HAB Housing to promote the site for a comprehensive scheme of mixed-use development for employment and housing (43 units). A pre-application scheme has been submitted to the Council, which is currently under consideration (Ref: 17/08890).</p> <p>In summary, it is necessary for the whole Tannery Site to be developed so that the new housing can assist in cross subsidising the delivery of the employment space in the existing redundant curtilage listed buildings, and add address other matters such as site remediation, ecology mitigation and parking / infrastructure provision that is required to deliver a comprehensive scheme.</p> <p>It is anticipated that a planning application will be submitted by the end of the Calendar Year. This application will be accompanied by an open book viability assessment, which will demonstrate the need to new build housing on the part of the site that lies outside the arbitrarily drawn 'Area of Opportunity', which has been carried forward from the West Wiltshire District Plan 1st Alteration.</p> <p>Policy H2: either; the inclusion of a mixed-use employment / housing allocation on the Holt Tannery Site; or, the extension of the existing settlement boundary to align with the area in red outlined on the enclosed plan (Ref: 1711 AP(0)00A).</p>				
Attached files (Please see Objective)	4715870				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To make the planning case for the subject 'omission' site to be included as an allocation or revision to the settlement boundary in the draft Plan.				

Comment ID:	1520	Consultee Sian Burke-Murphy	Agent Mr Stuart Miles	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132949	Person ID: 1129139	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Infrastructure Issues</p> <p>2.30 Representations made by the local community to the application for 10 dwellings at Ridgeway Farm suggest that there is community concern about the impact of this particular proposal in terms of road capacity and safety, flood risk and drainage issues, school capacity, landscape and biodiversity impacts and the potential for alternative sites to meet this demand.</p> <p>2.31 In considering the amount of development that Crudwell can accommodate, it is necessary to consider the capacity of existing infrastructure currently, and the ease with which this existing capacity can be increased if necessary.</p> <p>2.32 The Crudwell Neighbourhood Plan Steering Group has recently been advised by Wiltshire's School Places Commissioning department that Crudwell CE Primary School is at capacity, to the extent that an additional 40 dwellings would generate the need for an additional classroom at the school.</p> <p>2.33 The Topic Paper 2: Site Selection Process Methodology, June 2017 (at paragraph 6.1) notes that education specialists were consulted in determining which sites should be recommended for allocation. The detail of these discussions is not explained however.</p> <p>2.34 As you will be aware, Crudwell CE Primary School is on a small and constrained site, and lies within Crudwell's conservation area. In this regard, the Steering Group has received a statement from the Crudwell School Governing Body dated 19 th September 2017, which reads "Crudwell School, in its current form, is not able to accommodate a large increase in the number of children it educates. Significant financial investment would be required to develop the site including extra teaching space and staff and a larger school hall. Enlarging the number on role at the school may exacerbate parking problems already experienced at the school. At present there are no plans to expand the school."</p> <p>2.35 On that basis, there is no certainty that planning permission would be granted for any extension of the school. Without an extension, the additional primary school children that would live at any new allocation in Crudwell would need to travel either by private car or bus to schools outside Crudwell.</p> <p>2.36 Flood risk is also a significant issue at Crudwell, with a significant proportion of the village being at risk of either fluvial or surface water flooding, or both. The two plans below show the extent of flood risk set out on the Environment Agency's mapping.</p> <p>2.37 Inevitably this leads to community concern about the ability of the drainage network to accommodate new development. Again, the Neighbourhood Plan is best placed to examine this concern in detail, and to balance this risk with an as yet unidentified local need for new homes.</p> <p>2.38 Other infrastructure issues, including road capacity and safety, heritage impacts and landscape and wildlife impacts would also be best examined by the Neighbourhood Plan when there is no strategic priority for the Site Allocations Plan to be allocating sites. The Neighbourhood Plan Steering Group would determine the local need for housing, and then determine how best to accommodate any need that results, bearing these constraints in mind.</p> <p>Deletion of H2.13.</p>			

Attached files (Please see Objective)	4716080
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure that the detail of the case is put to the examiner.

Comment ID:	1521	Consultee HPH Ltd Person ID: 556098	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	Effective
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.9 Boreham Road				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Principle of development: the site at Boreham Road (Site 304) was granted outline planning permission by the Secretary of State for the Department of Communities and Local Government (DCLG) on 20th July 2017: LPA Ref: 13/06782/OUT; and PINS Ref: APP/Y3940/W/16/3150774. The outline planning permission grants detailed permission for a new vehicular access; and all other matters relating to 'layout', 'scale', 'external appearance', and 'landscaping' are reserved. A parallel listed building consent relating to the re-siting and refurbishment of the listed milestone has now been fully implemented pursuant to 13/06783/LBC.</p> <p>Policy H2: We fully support the proposed development plan allocation of the Boreham Road site (also known as Boreham Mead) under Policy H2. The permitted application proposals were supported by a comprehensive evidence base of reports covering all applicable technical disciplines. The evidence base has been subject to a high level of scrutiny including by: third parties to the planning process; statutory consultees; Wiltshire Council consultees, a judge in Judicial Review proceedings, a Planning Inspector; and most recently the Secretary of State. Our comments in respect of the proposed allocation under Policy H2 relate to the following matters of fact and detail:</p> <p>Quantum of development: the comprehensive evidence base that supports planning permission 13/06782/OUT, and its associated illustrative masterplan, clearly demonstrate the technical deliverability of site for up to 35 dwellings and associated infrastructure. We therefore object to the proposed quantum of 30 dwellings as set out in Table 5.3 under Policy H2.9.</p> <p>The Council have asserted that the site areas extends to 1.32ha. This is not correct. The applicant's land ownership extends to 1.513ha. The total developable area is 1.189ha. The Illustrative Layout included in the application submission demonstrates how 35 dwellings can be accommodated on the developable part of the site at a net density of approximately 29 dph (dwellings per hectare). Taking into account the peripheral landscaping and flood plain area, which will form part of the setting, the gross density equates to approximately 23 dph. On this basis, we consider that the quantum of development should be revised to 'approximately 35' dwellings.</p> <p>We can confirm that we would be willing to work with the Council to prepare a Statement of Common Ground to support the next iteration 'submission' version of the Plan.</p> <p>Our proposed changes are as follows:</p> <p>Amend Fig 5.13: to ensure that the redline corresponds precisely with the black (ownership line) of enclosed Plan Ref: 340/S/101</p> <p>Amend Table 5.3: to 35 dwellings</p> <p>Amend Paragraph 5.97: amend reference to the site area extent to 1.51 ha (i.e. the ownership line outlined in black)</p> <p>Amend Paragraph 5.101: delete reference to grade II listed milestone as its relocation and refurbishment has already been implemented pursuant to 13/06783/LBC (photosheet attached)</p>				
Attached files (Please see Objective)	4716077 / 4716078				
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	1522	Consultee Braeman Holdings Person ID: 556645	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy H2: we consider that the draft Plan should be making provision for additional growth in Melksham Community Area on the following basis: The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026.</p> <p>There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative sites.</p> <p>There is an acute unmet affordable housing need in the Melksham area, which can only be addressed by the provision of new housing to subsidise the provision of new affordable housing. Additional growth in large villages should be progressed in locations where there are no Neighbourhood Plans in prospect. New housing growth will support existing local facilities such as primary schools.</p> <p>The Housing White Paper (February 2017) seeks to diversify the supply of new housing in response to the dominance of the national / PLC volume home builders. The subject site is of a size that is suitable for development by a local / regional housebuilder.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in the Melksham Community Area, the subject site should be included allocated for circa 20 homes.</p> <p>Promotion history: Braeman Holdings own the freehold interest of the subject site (SHLAA Ref: 311). The site could also unlock the adjacent SHLAA site No. 317, which is in third party ownership. The subject site lies immediately adjacent to the Atworth Business Park, which is owned by Braeman Holdings. The site has defensible boundaries, and is not subject to any flood risk, arboricultural or other known constraints. Braeman Holdings have undertaken a feasibility study that has confirmed that a vehicular access to the subject site can be formed via the Atworth Business Park through re-organisation of the existing car park. The subject site has potential to accommodate up to circa 20 dwellings with associated landscaping works.</p> <p>Statement of Common Ground: Braeman Holdings confirm their willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that Braeman Holdings would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: to allocate land at Atworth (SHLAA Ref: 311) for circa 20 houses and associated works.</p>			
Attached files (Please see Objective)		4716114			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.			

Comment ID:	1523	Consultee Mrs Judith Parry	Agent R Boother RPS Planning	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129173	Person ID: 402467	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Draft Wiltshire Housing Sites Allocations Plan – June 2017 Pre Submission Consultation Response On behalf of Judith Parry Overall the proposed allocation at Church Lane, Trowbridge is welcomed. The site owner has instructed the completion of the surveys necessary to submit a planning application. It is anticipated that an application can be submitted by the Spring 2018. With regards to the exact wording of Policy H2.4 a revision is necessary to make the Plan as effective as possible. At para 5.67 we would request the wording is changed to: Approximately 3.72ha of land at Church Lane is allocated for the development of at least 45 dwellings, as identified on the Policies Map. The concept masterplan attached has been completed taking into the mitigation requirements as advised following the habitat survey undertaken. The recommendations were the following features should be retained and/or buffered from development (inc residential gardens) by wide (10-16m) dark (,1 lux) continuous corridors of native landscaping: - Boundary with Framfield, Church lane - Boundary Hedgerows - Lambrook Stream Taking this into account as well as other constraints the resultant developable area is 2.75 hectares. This is capable of accommodating in excess of the 45 dwellings envisaged in the wording as drafted.</p>				
Attached files (Please see Objective)	4773483				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1524	Consultee Mr Stephen Climpson Person ID: 1129196	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 Land East of the Dene		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to:</p> <p>Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and</p> <p>Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p>				

	<p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p> <p>The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1525	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Objection to Planning application site 3565 Southwick Court Fields Not positively prepared This site was considered "less sustainable" at stage 3. We therefore refute the suitability to build on "the edge of the built framework". Not consistent with national policy Government define housing number needs to Councils. However, Councils should be scrutinising more accurately how those numbers are divided around their county and not be led by developers who seek to make the most profit. Wiltshire Council is unfairly in our view promoting 900 homes to be built in Trowbridge that fall within approximately 2 miles of one another. Absurd and not a fair distribution around the County. Ie Chippenham has near links to the motorway but appears not to be taking their equivalent share. Other agencies not supporting development at Southwick Court The following agencies do not support development on Southwick Field. Clearly their views cannot be ignored nor their reasons why. Trowbridge Town Council Environment Agency Natural England Historic England County Planning Archaeologist Research has provided a response from Natural England case officer stating "I have briefly looked at the conclusions/recommendations in the Trowbridge Community Area Topic Paper and have noted the Site 3565 (Land east of the A361 at Southwick Court) is considered To be a less sustainable options for development and that five Moderate adverse effects have been identified in relation to this Site". This was the point raised at the very beginning of our objection letter</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1526	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Under Table 2: Settlement boundary review methodology: Stated Areas which have been excluded:</p> <p>Bullet points:</p> <p>'2' "isolated development that is physically Detached from the settlement"</p> <p>'3' "the extended curtilage of a property that Relates more closely to the open countryside (eg a field or paddock) or has the capacity to substantially extend the built form of the Settlement in terms of scale and location"</p> <p>'4' "Recreational or amenity space at the edge Of the settlement that relates more closely to the open countryside"</p> <p>In the light of the above three points why is Southwick Court included? Clearly to us the 3 bullet points are absolutely applicable to Southwick Court yet have been totally ignored.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1527	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We also understood that Planning Policy has for a generation deemed "There shall be no coalescence between the villages of North Bradley, Southwick, West Ashton Hilperton and Trowbridge" How can this now be disregarded? Do we not have a democratic right to protect village boundaries?</p> <p>Core Policy 29 (para S.150of WCS) "it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton have separate and distinct identified villages".</p> <p>Not justified/ effective In view of the refusal for application 16/12279/0UT land South of Blind Lane, Southwick the same criteria should be applied to site 3565.</p> <p>le development in the Parish of Southwick totally separated from the actual village, as this application is, and approximately 500 metres from the identified policy limits, the Council should be obligated to use the same criterion as before and we quote "the planning authority has no alternative other than to refuse planning permission".</p> <p>Lambrok brook divides Trowbridge with Southwick. Is protected by Law ie 1997 Hedgerow act. Clearly boundaries were put in place hundreds of years ago for the very purpose of separating towns and villages and should be permitted to remain. History cannot be rewritten.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1528	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Southwick Court Farm is a listed building, standing on land with important heritage assets. Records record post medieval water meadow system was, incredibly, created.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1529	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Furthermore, it was declared encroachment into open countryside and with the additional demolition of irreplaceable arable land as is true of Southwick Court land. By fracturing the arable land from the remaining block of farmable fields my farming family predict it is most likely to be uneconomically farmable with what will remain.</p> <p>Cattle can be seen grazing regularly on Southwick Court fields. The grass is an important crop and baled for Winter fodder. This is precious farming land separating Trowbridge and Southwick. There are extremely diminishing numbers of cattle being farmed in this locality and a huge loss for locally produced meat and dairy products.</p> <p>We have little industry in Trowbridge. It is most likely more residents settling in new developments will need to commute out of the town to try and find employment. A ghost town element.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1530	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The infrastructures are totally insufficient. Trowbridge has acute traffic congestion, during peak times vehicles are nose to tail. More vehicles in this 2 mile radius given traffic is routed only through 2 main routes, increases congestion adds more peril to cyclists, pedestrians, and especially school children who are encouraged to walk. We do not have wide enough roads for cycle routes.</p> <p>Access to Southwick Court fields No indication has been given at this stage although rumoured access would join Silver Street Lane.</p> <p>This is a heavily used road connecting traffic from Frome Road to Bradley Road.</p> <p>Grove Court School has new parking restrictions and parents now park in Silver Street Lane, and Balmoral Road, taking children to and from school. All day Silver Street Lane is busy with parked cars as it would appear staff now need to park there since the parking restrictions. The area is very busy with parents and children walking to and from school and coaches have always needed to park in Silver Street Lane when trips are arranged and children walk to the coach. Accessing a new development into Silver Street Lane with potential of an average of two cars per household x 180 houses bring ridiculous potential risks with dangerous increased levels of commuters.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1531	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Health and welfare services are stretched to the limit. Surgeries are indicating closing lists to new patients. We especially need an additional secondary school. Wiltshire Council Education officer actually stated this summer in the local press that without another senior school being built, there will be a shortage of places. Police and emergency services under constant pressure and under resourced. Trowbridge no longer has A&E services after 10pm at night. The RUH in Bath is absolutely working to full potential. We've just had personal in patient experience this month in RUH, when a medical doctor could not admit a single patient until another was discharged. She explained there was a serious shortage of nurses in the current climate. How can another 900 homes be added while the infrastructure is fit to bust?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1532	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>ENVIRONMENT</p> <p>Southwick Court fields have very established trees, hedgerows and bushes. The wildlife are very evident. All species of birds are seen and especially heard. They forage on the abundance of insects and berries from the vegetation. Lambrok brook runs alongside the fields and water can be heard running continually when raining and for long periods after. Water also pools in the field even in dry periods</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1533	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The ditch must be kept intact to sustain drainage.</p> <p>Southwick Court has heavy clay soil that holds the water and exhibits flooding and water pooling long after dryer weather resumes. This is known and well documented and contractors have been undertaking investigations recently in the fields. Extreme flooding has occurred where development has taken place on flood plain land despite developers so saying 'engineering fix is possible'. Tell that to the unfortunate home owners who suffer the 4 consequences. This was well documented by the media in Gloucestershire. Planning authorities must take more responsibility to prohibit such risky development taking place where there is any hint of doubt.</p> <p>Southwick Court fields clearly exhibit high flood plain risks.</p> <p>We take issue that building on Southwick Court puts the bungalows that front the field in particular jeopardy of flooding if a massive concrete development takes place and pushes water towards them. Also being single storey they would be overlooked.</p> <p>The Lambrok brook is essential for the draining of excessive water escaping from Southwick Court fields and we have recordings at different times during the summer indicating the fast flow of water.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1534	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Southwick Court field is a well used field for recreational purposes. We have had the benefit for many years of a 'kissing gate' entrance at Boundary Walk and a style too. Clearly using for recreational enjoyment has long been encouraged. Styles continue across connecting fields. This is a much appreciated area by so many people of all ages and used daily.</p> <p>Balmoral Road and Sandringam Road both have mature hedges/bushes and trees and some have TPOs.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1535	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Water Reservoirs BBC Country file programme last month highlighted that concerns are now being raised that with such huge developments taking place, and no new water reservoirs are being built, we face a serious future predicament.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1536	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire housing site allocations plan Brown field sites remain unused in Trowbridge. Yet we heard at a planning meeting in July that 5000+ planning permission has been granted for homes, not yet built on current brown field sites. Why not?</p> <p>Bowyers land that could/should be pushed forward to developers. Alongside there is the awful eye sore 'Town Bridge'. Neglected and in need of regenerating. Empty properties within the town. Why do Councils not seek the powers to be more proactive rather than elect to build on green fields. This is sacrosanct land and used lost forever for the benefit of farming and recreational purposes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1537	Consultee Hilary and George Chamulewicz	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Too little emphasis is considered for starter properties. One/two bedroom apartment and flats are ideal for starter homes. Blocks of flats too would enable more homes on land that is already available in the town. A much more economic use of valuable land.</p> <p>More affordable giving an opportunity to obtain home ownership because once renting, people cannot affordably save for a mortgage required for a house.</p> <p>Secondly, many people, single, older, perhaps retired and often want to downsize. If there were more desirable apartments with lower maintenance, downsizing would lead to houses being released to the open market. So many are too big for one occupant but who wants to downsize unless an attractive option is available?</p> <p>Huge lost opportunities here to help first time buyers and downsizing people. It seems all the emphasis is on homes for families.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1538	Consultee Develop 6 Person ID: 1129228	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2: we consider that the draft Plan should be making provision for additional housing growth in Melksham on the following basis: The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026.</p> <p>There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative sites in settlements in the next tier in the settlement hierarchy, such as Melksham.</p> <p>There is an acute unmet affordable housing need in Melksham, which can only be addressed by the provision of new housing to subsidise the provision of new affordable housing.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in Melksham, that the subject site should be included as an allocation for circa 80 homes in the draft Plan.</p> <p>Promotion History: Develop 6 have agreed a subject to planning promotion agreement with the landowner, to develop the paddock attached to Old Loves Farm for housing which extends to circa 2.5ha. The subject site has not previously been promoted for development, and is not included in the Council's SHLAA register.</p> <p>We enclose a copy of the Title Plan, which includes the existing principal dwelling to be retained, and the potential development site.</p> <p>Develop 6 are in the process of procuring a technical evidence base to support the site promotion. This will include: a topographical survey; drainage and utilities; heritage; ecology; transport and landscape baseline studies.</p> <p>Landscape, ecology and drainage: the site is not subject to any protected landscape or ecological designations, and is contained by defensible boundaries. A Landscape and Visual Appraisal, Phase I Habitat Survey and Flood Risk Assessment will inform the progression of a masterplan.</p> <p>Listed Building setting: the setting of the existing grade II listed farmhouse will need to be preserved. Subject to retaining a generous residential curtilage, it is considered that the subject site could be developed whilst preserving the setting of the listed building. The subdivision of the adjoining paddock site will be considered carefully through a landscape-led masterplan, and strict control of building heights through an agreed parameters plan.</p> <p>Site access and accessibility: preliminary comments from the project team's transport consultant are set out below: The speed limit on the A365 is 40mph which requires visibility splays at the Bowerhill Lane junction of 120m in both directions, which is achievable. It may be necessary to introduce a ghost island right turn lane similar to that at the Hornchurch Road junction to the west. To serve a development of circa 80 units Bowerhill Lane would need to be widened to at least a 5.5m carriageway width (ideally 6m) and at least one 2m wide footway, i.e. a total highway width of between 7.5 and 8m. The existing verges and carriageway are in excess of this overall width so it would be possible to implement the required widening.</p>			

	<p>The proposed site is within a convenient walking distance of local primary and secondary schooling together with convenience shopping on the wider Bowerhill Estate. A pedestrian / cycle link is already provided linking Bowerhill Lane through to Hornchurch Road which helps with the overall non-car accessibility of the site. Local bus services are also available on both the A365 and through the Bowerhill Estate.</p> <p>Statement of Common Ground: the site promoter, Develop 6, confirms their willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that Develop 6 would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: Wiltshire Council to allocate the subject site for circa 80 dwelling units on the paddock part of the site, as outlined in enclosed Title Plan.</p>
<p>Attached files (Please see Objective)</p>	<p>4716234 / 4716236</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.</p>

Comment ID:	1539	Consultee Mr Paul Clarke PAC Farms LTD Person ID: 1129236	Agent Miss Emma Greening Senior Planner Hunter Page Planning Person ID: 1004509	Do you consider the draft WHSAP is legally compliant?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Marlborough				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My Client owns the Manton Estate in Marlborough, and has previously made a SHLAA submission in respect of the attached site. Whilst outside the settlement boundary, the site is not considered to be in an isolated location. There are a number of existing dwellings and commercial units within the vicinity and there is good road access within the estate to the site.</p> <p>It is disappointing that the Allocations Plan fails to allocate any sites within the Marlborough Community Area on the basis that there is only an indicative residual requirement of 17 dwellings within the plan period. Paragraph 47 of the NPPF requires LPA's to boost significantly the supply of housing and it should be acknowledged that the numbers set out in the Core Strategy are a minimum target.</p> <p>The SHLAA submission for the Manton Estate proposes a mixed use residential development for up to 50 dwellings together with the possible conversion of the existing stable block, possibly to create a care home of around 50 beds.</p> <p>There is a requirement within the NPPF at paragraph 50 to deliver a wide choice of high quality homes and create sustainable, inclusive and mixed communities. It is acknowledged in the Wiltshire Core Strategy at paragraph 2.14 that the county has an increasingly ageing population which over the plan period is likely to increase the fastest.</p> <p>Whilst it is acknowledged that the site is located within the AONB, there are already a significant number who live and work on the Manton Estate and the proposals present an opportunity for additional communities facilities for both new and existing residents such as improvements to the village green or additional community or recreation space.</p> <p>Additional development would represent infill development around existing dwellings and commercial space, and should not be viewed as isolated development in the countryside, moreover development within the Manton Estate would help to ensure the sympathetic use and longevity of the estate.</p> <p>The NPPF sets out 4 requirements which Local Plans must meet. Taking each in turn, in summary, the Allocations Plans does not meet these for the following reasons.</p> <ol style="list-style-type: none"> 1. Positively prepared: The failure to consider sites within the Marlborough Community Area, will mean that it will be difficult for parishes to meet their housing need. 2. Justified: No sites within the Marlborough Community Area have been allocated on the basis that there is no residual requirement for the rest of the plan period. This simplistic approach does not allow for a detailed assessment of individual sites. 3. Effective: By not allocating any sites, it is unlikely that Parishes will be able to meet their housing need. 4. Consistent with National Policy: The NPPF seeks to significantly boost the supply of housing, and also seeks to plan for a mix of housing based on current and identified future trends. By not allocating sites for development within the Marlborough Community Area, the Plan is not seeking to meet existing needs within the settlement, let alone future needs. <p>The Council should consider the inclusion of this site, within the Allocations Plan.</p>				
Attached files (Please see Objective)	4716244				

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Alternative sites suitable for development should be discussed in a public forum.

Comment ID:	1540	Consultee Freehold Consortium for Harnham Business Park	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1129241	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy H3; and H3.1: the Freehold Consortium support the principle of a mixed-use allocation of Land at Netherhampton Road. However, they object to the omission of the subject site, Land at Harnham Business Park (SHLAA Ref: Site 3187), from this proposed allocation on grounds of: lack of a comprehensive approach; and an incorrect assessment of the subject site in the Sustainability Appraisal (Ref: Annex 1: A6: pages 112-129).</p> <p>Land ownership the Harnham Business Park, extending to circa 3.0ha as outlined in red on the enclosed Site Location Plan (Ref: 1402/P01), is owned by the 'Freehold Consortium for Harnham Business Park'. We can confirm on behalf of the Freehold Consortium that the subject site remains available for development / allocation.</p> <p>Promotion background: the subject site is previously developed land that was formerly occupied by SSEB as an engineering and maintenance depot. It is understood that the original SSEB building coverage on the site was circa 2,100 sqm and that around 45 FTE jobs were accommodated on the site.</p> <p>Following the closure of the SSEB depot, the subject site has been the subject to a number of previous planning applications and permissions. The southern portion of the site has been developed, and an access road linking the site to Netherhampton Road was installed following the implementation of planning permission S/2004/1779. Booker Cash & Carry occupy a building of circa 680 sqm. The remaining site area of circa 3.0ha remains undeveloped, but continues to be marketed by commercial agents, Myddleton Major.</p> <p>A speculative outline planning application was submitted on the subject site in 2014 for '65 dwellings, public house, 60-bed hotel, 1,902sqm of new business units (B1, B2, B8) and parking, landscaping and associated works' (LPA Ref: 14/08321/OUT). Following an objection from the Council's Spatial Planning Team, the application was withdrawn to enable the site to be promoted through Wiltshire Housing Site Allocations Plan. However, it should be noted that technical reports and baseline studies submitted pursuant to the 2014 application were accepted by the Council and statutory consultees. This confirms that there are no constraints or technical issues that cannot be overcome or mitigated in relation to the future development of the subject site.</p> <p>All previous employment-related planning permissions granted in respect of the subject site have now lapsed. The subject site is not allocated for employment development in the adopted Core Strategy (2015). Ongoing site marketing by the appointed commercial agents, Myddleton Major, confirms that there is no specific demand for the vacant land, and the speculative provision of serviced employment plots (or speculative employment units) in this location would not be viable.</p> <p>Following the withdrawal of planning permission 14/08321/OUT, informal discussions have taken place with both the Council and the promoters of the adjacent site (SHLAA Ref: S1028), Bovis Homes, in respect of the inclusion of the subject site as part of the proposed allocation of Land at Neverhampton Road. The combined sites, including the subject site (3187), were included in a draft Vision Statement that was prepared by Bovis Homes in October 2015.</p>			

Although no formal contract has been agreed between Bovis Homes and the Freehold Consortium, the Consortium wish to continue to collaborate with Bovis Homes and the Council in respect of the promotion of the subject site as part of a comprehensive approach embracing both sites, as envisaged in the aforementioned Draft Vision Statement (2015).

We submit that it is essential for the subject site to be included in the allocation under Policy H3.1. The inclusion of the subject site would provide:

- an attractive frontage to the development with associated public realm enhancement along the A3094, including the long-term preservation and management of the existing avenue of mature roadside trees;
- provision of a direct pedestrian/cycle links from S1028 to Netherhampton Road;
- potential to be independently delivered as a first phase of a comprehensive development; and
- bringing vacant previously developed employment land into viable beneficial use through residential-led mixed-use development, which in turn will reduce the need for greenfield site release.

Comments on the Sustainability Appraisal: it is noted that the Sustainability Appraisal assessment rejected the subject site solely on grounds relating to loss of employment land under Objectives 11 and 12. All the preceding Objectives (1-10) were demonstrably satisfied. However, we note that the subject site was measured incorrectly as 1.39ha where as its gross area measurement is in fact 3.0ha. Consequently, the potential residential development capacity of the subject site was underestimated at 35 dwellings. The subject site has capacity to accommodate circa 80-90 dwellings plus associated landscaping and infrastructure.

The incorrect reference to the area of the subject site leads us suspect that the external sustainability assessor, Atkins, may have confused the subject site with the adjacent Harnham Trading Estate.

The reason for the exclusion of the subject site under the Level 3 assessment is stated under the Objective 12 summary is as follows:
 “Development of this site would lead to the direct loss of designated employment land. Development of this site would significantly adversely affect the industrial estate and therefore development of this site is considered to result in a major adverse effect against this objective.”

We submit that this statement is factually incorrect. The land is not ‘designated’ employment land. It is previously developed land that was last in employment use. It is not allocated employment land in the adopted Core Strategy.

It is not clear from Objective 12 summary which ‘industrial estate’ would be significantly adversely affected. The adjacent Harnham Trading Estate is fully developed and occupied, and the Booker Cash and Carry on the Harnham Business Park is trading.

The approach taken by Atkins under Objectives 11 and 12 of their sustainability appraisal appears to have ignored national planning policy as set out in Paragraph 22 of the NPPF, which states:

22. Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

The Freehold Consortium, and their commercial agent advisors, submit that the subject site is not viable for employment development. New larger scale employment land could be included on the land being promoted by Bovis (S1028) and targeted at appropriate employment sectors. The Harnham Business Park site has potential to deliver a first phase of housing and infrastructure as part of an agreed masterplan.

Statement of Common Ground: the Freehold Consortium re-confirm their willingness to work collaboratively with Wiltshire Council and Bovis Homes to promote a comprehensive mixed-use development including the subject site and the land being promoted by Bovis Homes. If the Council is minded to include the subject site in the Land at Netherhampton Road allocation under Policy H3.1, we can confirm that The Freehold Consortium would be willing to participate in process of agreeing a Statement of Common Ground in advance of the finalisation of the ‘submission’ version of the Draft Plan.

Policy H3, Policy H3.1: to include Land at Harnham Business Park (Site 3187) in the Land at Neverhampton Road allocation – noting the potential of this previously developed land to contribute circa 80-90 dwellings as part of an early phase of a comprehensive mixed-use development proposal.

Attached files (Please see Objective)

4716301 / 4716302

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.

Comment ID:	1541	Consultee Mr Stuart Lee Managing Director	Agent Mr Gary Llewellyn Planning Consultant	Do you consider the draft WHSAP is legally compliant?	Yes
		GFL Developments Ltd	Person ID: 399789	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.22		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The provisions of Core Policy 1 (and Core Policy 8) of the adopted Wiltshire Core Strategy (January 2015) indicates that Calne is a “Market Town” within the District’s settlement hierarchy where new housing development (1440) is encouraged to locate. It is seen as having “the potential for significant development that will increase the number of jobs and homes to help sustain/ enhance services and facilities and promote self-containment and sustainable communities”. The supporting text to Core Policy 1 (Paragraph 4.13) states that the town’s development boundary will be reviewed as part of this DPD and its Neighbourhood Plan.</p> <p>The provisions of the NPPF (Paragraph 158) require that a Local Plan be based on adequate up-to-date and relevant evidence. The Wiltshire Housing Site Allocation Plan (WHSAP) and the emerging Neighbourhood Plan both fail in this regard.</p> <p>The WHSAP is supported by a Topic Paper (1) which indicates the methodology adopted to review the settlement boundaries. The document indicates that “the Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established” and the settlement boundaries have been amended “where necessary”(Paragraph 1.3). It is noted that in formulating the new settlement boundary for Calne, due regard has been given to including all “built and commenced planning permissions” but excluding “all types of unimplemented planning permissions” (Table 7.1). This approach is justified on the basis that the schemes may “never get built out and that the final built form may differ substantially from the original permission” (Paragraph 7.13) and as the settlement boundary defines the “built form of the settlement” the such planning permissions “do not form part of the built environment” (Paragraph 7.14). The fact that the Council has given planning permission to such developments confirms that they are, in planning policy and other terms, acceptable. Also, the decision to submit such applications would have been made on the basis there is intent to build out the approved scheme. They will have the usual timescale (3 years) in which to be implemented and, if they do lapse, then the planning history of the site is a material planning consideration for the submission of further planning applications.</p> <p>The revised settlement boundary (as shown by a red line) for Calne is still deemed to be out of date and thus not compliant with the advice in the NPPF. It seems to acknowledge some housing developments and not others. In seeking to illustrate the point, these developments have been mapped and are shown on the attached Annex to these representations. The plan indicates that:-</p> <ol style="list-style-type: none"> 1. The 124 dwelling housing estate being built by Barratts at Abberd Lane is acknowledged. This was given consent in October 2014 (13/02833/OUT) and August 2015 (15/05254/FUL) respectively. 2. The 200 dwelling housing estate being built by Hills Homes at Oxford Road is ignored. This was given consent in September 2012 (11/03524/OUT) and May 2016 (15/05831/REM) respectively. 3. The 12 dwelling housing estate being built by GFL Developments at Sandpit Road is ignored. This was given consent in May 2015 (14/03053/OUT) and January 2016 (15/07282/REM) respectively. 				

The plan also indicates that outline planning permission (16/07531/OUT) was given in March 2017 for a 21 dwelling housing estate at the east end of Sandpit Road. It is understood that this land is to be sold to a developer.

The Council currently has 2 applications pending determination; one for Hills Homes (16/05344/FUL) for a 26 dwelling housing estate on Oxford Road and the other for David Wilson Homes (15/11230/OUT and 17/07700/REM) for a 42 dwelling housing estate also on Oxford Road.

The reserved matters application by David Wilson Homes also indicates that land immediately to the north of the site is intended to accommodate a further 42 dwellings. This is also the case for GFL Developments who are looking to develop the land to the east of the Hills Homes estate and this is seen as being able to accommodate 100+ dwellings.

The emerging Neighbourhood Plan (February 2017) includes a Policies Map (Map 4) which shows a Settlement Framework Boundary (SFB) (CS - CP1) surrounding the town. The identified boundary appears to be the same as that in the former adopted North Wiltshire Local Plan 2011 (2006) which is deemed to be out of date. Also, no indication is given that the SFB (Policy H5) is to be amended despite the Town Council allocating a site for housing development (Policy H1(Site A)) directly abutting it. This allocation is seen as being able to accommodate up to 250 dwellings and will provide significant community benefits.

The Topic Paper (1) referred to above indicates (Paragraphs 8.3 and 8.4) that the review of Calne's settlement boundary was done using the following:-

1. Geographical information system (GIS) data sets, including aerial imagery and ordnance survey maps; and
2. Feedback from Planning Officers with relevant local knowledge.

Given the information on the attached map, it would appear that only the housing scheme being built by Barratts was the only one worthy of acknowledgement. Depending on when the Planning Offices provided feedback to the desk-top maps, two sites are currently under construction. As noted above, this includes the large housing estate (200 dwellings) being built by Hills Homes Ltd to the east of Oxford Road, Calne and the small housing estate (12 dwellings) being built by GFL Developments Ltd to the south of Sandpit Road, Calne. In view of the above, the published plan for Calne should be revised to take account of these 2 housing developments.

The Topic Paper (1) indicates that where current unimplemented planning permissions are subsequently built out they can be included within a future review (Paragraph 7.14) of settlement boundaries. The situation is such that no indication is given as to the timescale for such a review. The settlement boundary for Calne, for instance, has been in place since the North Wiltshire Local Plan was adopted in June 2006! The Topic Paper recognises that "settlement boundaries represent a snapshot in time" (Paragraph 7.14). This is the problem i.e. they have no flexibility when it comes to acknowledging and accepting changes in circumstances. The NPPF requires the supply of housing to be boosted significantly (Paragraph 47) and so overly restrictive settlement boundaries are more of a hindrance than a help in this regard.

The recognition of unimplemented planning permissions on sites within a settlement boundary will show that, at some time, they will come forward thus giving a degree of certainty to all parties, including the landowner, developer and Council. It is noted that the Footnote (11) to the second bullet point of Paragraph 47 of the NPPF indicates that "sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example, they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans." Again, as noted above, the planning history of a site is a material planning consideration and so any future applications for housing would have to take this into account.

Attached files (Please see Objective)

4716318

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1542	Consultee W N Overy Person ID: 704465	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 Land East of the Dene		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p> <p>The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1543	Consultee Doric Developments (Bath) Ltd	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 390590	Planning Sphere	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy H2: we consider that the draft Plan should be making provision for additional growth in Melksham Community Area on the following basis: The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026.</p> <p>There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative sites.</p> <p>There is an acute unmet affordable housing need in the Melksham area, which can only be addressed by the provision of new housing to subsidise the provision of new affordable housing.</p> <p>Additional growth in large villages should be progressed in locations where there are no Neighbourhood Plans in prospect. New housing growth will support existing local facilities such as primary schools.</p> <p>Housing White Paper (February 2017) seeks to diversify the supply of new housing in response to the dominance of the national / PLC volume home builders. The subject site is of a size that is suitable for development by a local / regional housebuilder.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in the Melksham Community Area, the subject site should be included allocated for circa 12 homes.</p> <p>Promotion history: Doric Developments (Bath) Ltd own the freehold interest of the subject site.</p> <p>The subject site measures approximately 1.72ha and comprises an agricultural paddock adjacent to Lagard House. The site is also bounded by First Lane to the north; Corsham Road (B3353) to the east; and a water course to the south known as South Brook.</p> <p>The enclosed Environment Agency Flood Risk Map extract confirms that only the south eastern part of the site is situated within Flood Risk Zones 2 and 3. The paddock is relatively open and is not constrained by trees or any known protected species. No landscape or other designations are applicable.</p> <p>A pre-application enquiry was submitted to Wiltshire Council in August 2016. Written pre-application advice was received in September 2016 (16/07809/PREAPP). This confirmed that all technical issues associated with the delivery of the site could be addressed, and as such it is concluded that circa 8 No. dwellings plus an overflow car park for the primary school could be accommodated on site.</p> <p>Statement of Common Ground: Doric Developments confirm their willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that Doric Developments would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: to allocate land at Whitley (SHLAA Ref: 3459) for circa 8 houses and associated works including the provision of an overflow parking area for the primary school.</p>			
Attached files (Please see Objective)		4716350			

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.

Comment ID:	1544	Consultee Ms Jan Gullickson Person ID: 1129255	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 Land East of the Dene		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p> <p>The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1545	Consultee Mrs Tina Jones Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Cricklade Town Council		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other: Community Area Topic Paper - Royal Wootton Bassett and Cricklade		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Settlement Boundary Review : Points of Disagreement</p> <p>a) Land south of The Forty (H9 & I9) has been excluded from the settlement boundary by WC because the methodology is to exclude “All types of unimplemented planning permissions as at 1st April 2016”</p> <p>The DCNP includes the site because the land has outline permission for 70 dwellings (WC reference 13/07132) which the current owner is actively proposing to develop (WC reference 17/03586).</p> <p>We are of the view that not including areas within the new settlement boundary that are adjoining the existing settlement boundary, and which have planning permission for development, will lead to any policies seeking to confine development within the settlement boundary being weakened. Accordingly, we are firmly of the opinion that the area covered by outline planning permission 13/07132 should be included within the settlement boundary.</p> <p>If you are not willing to extend the boundary to accommodate the planning permissions granted then such sites should be shown on settlement boundary maps as ‘permitted sites’ for the purpose of better informing users.</p>				
Attached files (Please see Objective)	4709938				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The process of developing a Neighbourhood Plan for Cricklade continues and it is imperative that whenever the oral examination takes place, the inspector is fully aware of the most up to date information about the stage reached in the NP process				

Comment ID:	1546	Consultee Mrs Tina Jones Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Cricklade Town Council		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other: Community Area Topic Paper - Royal Wootton Bassett and Cricklade		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		b) Two properties with substantial gardens at the northern end of West Mill Lane (G4) which have been included by WC (quoting their methodology) "... to include area of built residential development physically related to the settlement." We are of the view that these two properties should be excluded on the grounds that the combined site "... has the capacity to substantially extend the built form of the settlement in terms of scale and location." We are of this opinion because the site is a substantial one at the end of a narrow lane which makes access difficult. It is also in close proximity to North Meadow National Nature Reserve which is a Site of Special Scientific Interest. Therefore the possibility of this site being proposed for 'infill' development at some stage in the future should be resisted.			
Attached files (Please see Objective)		4709938			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The process of developing a Neighbourhood Plan for Cricklade continues and it is imperative that whenever the oral examination takes place, the inspector is fully aware of the most up to date information about the stage reached in the NP process			

Comment ID:	1547	Consultee Mrs Tina Jones Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Cricklade Town Council Person ID: 1051839		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other: Community Area Topic Paper - Royal Wootton Bassett and Cricklade		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	c) Open Space at Long Close/Hall Close (I4 & I5) and Open Space at Waylands (J8 & K8) have been partly excluded from the settlement boundary "... to exclude area of land more closely related to the open countryside." However, The DCNP excludes the whole of these areas of open space. We propose that these areas should be excluded to avoid the need for drawing artificial boundaries.				
Attached files (Please see Objective)	4709938				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The process of developing a Neighbourhood Plan for Cricklade continues and it is imperative that whenever the oral examination takes place, the inspector is fully aware of the most up to date information about the stage reached in the NP process				

Comment ID:	1548	Consultee Mrs Tina Jones Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Cricklade Town Council Person ID: 1051839		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other: Community Area Topic Paper - Royal Wootton Bassett and Cricklade		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Other Matters</p> <p>The process of producing the Cricklade Neighbourhood Plan continues and it is now further advanced than that shown in the WC Pre-submission Draft Plan. The Regulation 16 consultation period has now ended and we anticipate that the Independent Examiner will be appointed very shortly.</p> <p>We therefore request that WC should recognise that the DCNP is at a more advanced stage than that stated in their consultation document.</p>				
Attached files (Please see Objective)	4709938				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The process of developing a Neighbourhood Plan for Cricklade continues and it is imperative that whenever the oral examination takes place, the inspector is fully aware of the most up to date information about the stage reached in the NP process				

Comment ID:	1549	Consultee Marion Dewar	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129270	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to add my voice to object to the proposed building on land the Trowbridge side of Elizabeth Way.</p> <p>I feel that if you are to build houses (180 odd) on that side of the road, then in due course there will be building on the Hilperton Gap side. This is what I really object to . Hilperton as a village needs to keep its autonomy and not just become an urban sprawl into Trowbridge. The land on the Hilperton side needs to be kept safe in the way it is, green fields. I would not like to see housing on the Trowbridge side spill onto the other side of Elizabeth Way.</p> <p>What guarantees would there be? We cannot have surrounding villages like Hilperton and others on the other side of Trowbridge (for example, Southwick/North Bradley), becoming sucked into Trowbridge.</p> <p>There are other brownfield sites which are available to build on nearer to Trowbridge; why not use those, and not build on green field sites. Also building on Hilperton Marsh which is liable to flood etc (hence the name!) seems somewhat shortsighted.</p> <p>I hope my comments will be taken into account.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1550	Consultee Juliett Todd Person ID: 1129287	Agent Miss Emma Greening Senior Planner Hunter Page Planning Person ID: 1004509	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.36 Oaksey			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site with which this representation relates is SHLAA Site 3349 Street Farm Paddocks, Oaksey, together with the former agricultural/commercial buildings along the street frontage.</p> <p>Oaksey is identified within the Core Strategy as a large village which policy CP1 describes as a settlement with a limited range of employment, services and facilities. The policy further states that development at large villages will be limited to that needed to help meet the housing needs of settlement and to improve employment opportunities, services and facilities.</p> <p>The Allocation plan only proposes to allocate 40 additional dwellings within the Malmesbury Community Area, despite there being a residual requirement for 70. It is also noted that the NPPF at paragraph 47 requires LPA's to boost significantly the supply of housing.</p> <p>My clients site is currently located within the settlement boundary for boundary and is therefore currently considered acceptable in principle for development.</p> <p>The Allocations Plan proposes to amend the settlement boundary so that it excludes this site.</p> <p>The justification for the amendments to the settlement boundary are to exclude the area which is more closely related to the countryside.</p> <p>The site in question comprises a paddock in the centre of the village, there are clearly defined boundaries around the site which means that there would be no further encroachment into the countryside and in addition, the residential curtilages to the east extend almost in line with the rear of the site. The site is located in the centre of the village, close to the Village Hall, primary school and bus stop. As a result, the site is seen as a sustainable location within the village. The allocations plan seeks to extend the settlement boundary for Oaksey in a linear fashion away from the centre of the village and its associated facilities, which is considered to be less suitable.</p> <p>The site assessment for site 3349 excluded it at Stage 2, because there is uncertainty over how direct vehicular access to the site would be achieved. My client is currently preparing a planning application, that would utilise the access from Cargill Place into the site which would overcome the concerns relating to the access. The initial SHLAA site proposed a total of 18 dwellings in this location, however my client is looking at a smaller number of dwellings (3-5) which would be more in keeping with the character of the Conservation Area and adjoining heritage assets. The development of the proposed paddock will also assist in enabling the sympathetic conversion of the traditional barns to the front of the site fronting onto 'The Street' ensuring that the new development integrates well with the existing built form.</p> <p>Given that the concerns over the access can be overcome, the site is considered to be available and suitable for development. A lower density proposal with suitable landscape treatment will also ensure that the development will assimilate with the current development boundary and provide a clear definition between countryside and settlement.</p> <p>Between 2006 and 2016, there have only been 13 completions within the village of Oaksey, and in order to survive in a sustainable manner villages need some growth. Within Oaksey, the only site which was taken forward beyond stage 2a was land at Wick Road. However further assessment of this revealed significant sites constraints.</p>			

	<p>The NPPF sets out 4 requirements which Local Plans must meet. Taking each in turn, in summary, the Allocations Plans does not meet these for the following reasons.</p> <ol style="list-style-type: none"> 1. Positively prepared: The proposals fail to allocate a site within Oaksey despite it being identified as a large village. The lack of housing proposed and the removal of suitable sites from the settlement boundary will mean that the village is unable to meet any local housing need. 2. Justified: Given the constraints relating to the Wick Road site, there are not considered to be any suitable alternatives within the village and as such the settlement boundary should remain in its current location so that Street Farm Paddocks is included. 3. Effective: By amending the settlement boundary in the centre of the village, it means that development will extend in a linear fashion, whereas retaining the settlement as existing will ensure additional development in the centre of the village which is seen as more sustainable. 4. Consistent with National Policy: The NPPF seeks to significantly boost the supply of housing, by removing sustainable sites from the settlement boundary, this will mean that in time Wiltshire will be unable to meet its Objectively Assessed Need. <p>The settlement boundary should be retained in its current position to include SHLAA site 3349 Street Farm Paddocks.</p>
<p>Attached files (Please see Objective)</p>	<p>4716433</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>It is necessary for the debate associated with change in settlement boundary to be discussed in a public forum.</p>

Comment ID:	1551	Consultee Juliett Todd Person ID: 1129287	Agent Miss Emma Greening Senior Planner Hunter Page Planning Person ID: 1004509	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.		Oaksey		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site with which this representation relates is SHLAA Site 3349 Street Farm Paddocks, Oaksey, together with the former agricultural/commercial buildings along the street frontage.</p> <p>Oaksey is identified within the Core Strategy as a large village which policy CP1 describes as a settlement with a limited range of employment, services and facilities. The policy further states that development at large villages will be limited to that needed to help meet the housing needs of settlement and to improve employment opportunities, services and facilities.</p> <p>The Allocation plan only proposes to allocate 40 additional dwellings within the Malmesbury Community Area, despite there being a residual requirement for 70. It is also noted that the NPPF at paragraph 47 requires LPA's to boost significantly the supply of housing.</p> <p>My clients site is currently located within the settlement boundary for boundary and is therefore currently considered acceptable in principle for development.</p> <p>The Allocations Plan proposes to amend the settlement boundary so that it excludes this site.</p> <p>The justification for the amendments to the settlement boundary are to exclude the area which is more closely related to the countryside.</p> <p>The site in question comprises a paddock in the centre of the village, there are clearly defined boundaries around the site which means that there would be no further encroachment into the countryside and in addition, the residential curtilages to the east extend almost in line with the rear of the site. The site is located in the centre of the village, close to the Village Hall, primary school and bus stop. As a result, the site is seen as a sustainable location within the village. The allocations plan seeks to extend the settlement boundary for Oaksey in a linear fashion away from the centre of the village and its associated facilities, which is considered to be less suitable.</p> <p>The site assessment for site 3349 excluded it at Stage 2, because there is uncertainty over how direct vehicular access to the site would be achieved. My client is currently preparing a planning application, that would utilise the access from Cargill Place into the site which would overcome the concerns relating to the access. The initial SHLAA site proposed a total of 18 dwellings in this location, however my client is looking at a smaller number of dwellings (3-5) which would be more in keeping with the character of the Conservation Area and adjoining heritage assets. The development of the proposed paddock will also assist in enabling the sympathetic conversion of the traditional barns to the front of the site fronting onto 'The Street' ensuring that the new development integrates well with the existing built form.</p> <p>Given that the concerns over the access can be overcome, the site is considered to be available and suitable for development. A lower density proposal with suitable landscape treatment will also ensure that the development will assimilate with the current development boundary and provide a clear definition between countryside and settlement.</p> <p>Between 2006 and 2016, there have only been 13 completions within the village of Oaksey, and in order to survive in a sustainable manner villages need some growth. Within Oaksey, the only site which was taken forward beyond stage 2a was land at Wick Road. However further assessment of this revealed significant sites constraints.</p> <p>The NPPF sets out 4 requirements which Local Plans must meet. Taking each in turn, in summary, the Allocations Plans does not meet these for the following reasons.</p>			

	<p>1. Positively prepared: The proposals fair to allocate a site within Oaksey despite it being identified as a large village. The lack of housing proposed and the removal of suitable sites from the settlement boundary will mean that the village is unable to meet any local housing need.</p> <p>2. Justified: Given the constraints relating to the Wick Road site, there are not considered to be any suitable alternatives within the village and as such the settlement boundary should remain in its current location so that Street Farm Paddocks is included.</p> <p>3. Effective: By amending the settlement boundary in the centre of the village, it means that development will extend in a linear fashion, whereas retaining the settlement as existing will ensure additional development in the centre of the village which is seen as more sustainable.</p> <p>4. Consistent with National Policy: The NPPF seeks to significantly boost the supply of housing, by removing sustainable sites from the settlement boundary, this will mean that in time Wiltshire will be unable to meet its Objectively Assessed Need.</p> <p>The settlement boundary should be retained in its current position to include SHLAA site 3349 Street Farm Paddocks.</p>
<p>Attached files (Please see Objective)</p>	<p>4716433</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>It is necessary for the debate associated with change in settlement boundary to be discussed in a public forum.</p>

Comment ID:	1552	Consultee Mrs Crane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72,111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1553	Consultee Mrs Crane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am particularly concerned about the increase in traffic in this area. The A361. Frome Road in Trowbridge is already a very busy road and increasing traffic along this road will increase the likelihood of accidents to both pedestrians and road users. I had two young children who are currently frightened to walk along the pathway and cars and lorry's travel fast out of town and scare them. No one currently remains within the speed limit, either day or night and this will increase with more cars using the road .</p> <p>Accessibility from sites 3565, 3620 and 1021</p> <p>The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1554	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1555	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am particularly concerned about the increase in traffic in this area. The A361. Frome Road in Trowbridge is already a very busy road and increasing traffic along this road will increase the likelihood of accidents to both pedestrians and road users. I had two young children who are currently frightened to walk along the pathway and cars and lorry's travel fast out of town and scare them. No one currently remains within the speed limit, either day or night and this will increase with more cars using the road.</p> <p>Accessibility from sites 3565, 3620 and 1021</p> <p>The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1556	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am particularly concerned about the increase in traffic in this area. The A361. Frome Road in Trowbridge is already a very busy road and increasing traffic along this road will increase the likelihood of accidents to both pedestrians and road users. I had two young children who are currently frightened to walk along the pathway and cars and lorry's travel fast out of town and scare them. No one currently remains within the speed limit, either day or night and this will increase with more cars using the road.</p> <p>Accessibility from sites 3565, 3620 and 1021</p> <p>The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1557	Consultee Mrs Crane	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1558	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds. I am also concerned for the Bats. We are lucky enough to share an area with Bats that I know are currently protected. I understand that when building new homes developers have a responsibility to maintain their flightpath, however the Bats are nearly always forced to relocate. Please take this into consideration when planning.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1559	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1560	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1561	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1562	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1563	Consultee Mrs Crane	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129290	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds. I am also concerned for the Bats. We are lucky enough to share an area with Bats that I know are currently protected. I understand that when building new homes developers have a responsibility to maintain their flightpath, however the Bats are nearly always forced to relocate. Please take this into consideration when planning.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1564	Consultee Mr Peter Temple	Agent Mr Richard Edge Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1129295	Assetoptimal Ltd Person ID: 1129296	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Smaller isolated allocations can be justified to help balance development and provide smaller sites possibly for self build. Policy H2: Additional smaller housing allocation sites should be allocated to cater for smaller developers and self builders. The subject site would form a natural extension to existing housing pattern. The site is outside a flood risk 2 and 3 Area.				
Attached files (Please see Objective)	4716444				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To make representations regarding the planning case as to why the subject site should be allocated in the draft Plan to cater for smaller developers and self builders.				

Comment ID:	1565	Consultee Mr and Mrs Legh and Diana Walker	Agent Mr Richard Edge Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1129300	Assetoptimal Ltd Person ID: 1129296	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10 Barters Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2.11: The housing allocation as proposed for the Barters Farm nursery site, and the supporting text is fully supported, as currently drafted. The work that has been undertaken in the Sustainability Appraisal is considered to be sound in all respects, in relation to the subject site.</p> <p>Site promotion and delivery: The owner of the site confirms that the site is available and deliverable and we have interest from an active developer to take the site forward.</p> <p>We understand that the developer will shortly appoint their team of consultants to progress the technical work. The technical evidence base will be prepared this will allow the development of a masterplan to form the basis of a pre-application consultation with the Council.</p> <p>The owner envisages that a full planning application could be submitted to tie in with the publication of draft Plan 'submission' version.</p> <p>If a planning permission was granted in say 2018, we understand that the developer would seek delivery of the completed scheme in 2019, given its relatively modest size.</p> <p>Statement of Common Ground: The landowner and its developer will commit to working with the Council to establish the evidence of technical reports required to bring the site forward, and develop a Statement of Common Ground that can be included within the 'submission' version of the draft Plan prior to submission to the Secretary of State.</p>				
Attached files (Please see Objective)	4716454				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To make representations regarding the planning case as to why the subject site should be allocated in the draft Plan.				

Comment ID:	1566	Consultee Ms Anna Reali	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72,111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over an appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1567	Consultee Ms Anna Reali	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility The A361 is prone to accidents both "In the dip" where cars currently turn into the Country Park as well as in the 30mph limit zone further up the hill towards Trowbridge. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered on the basis that they would reduce traffic, as residents would walk into Trowbridge rather than using their own vehicles. No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1568	Consultee Ms Anna Reali	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1569	Consultee Ms Anna Reali	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility The A361 is prone to accidents both "In the dip" where cars currently turn into the Country Park as well as in the 30mph limit zone further up the hill towards Trowbridge. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered on the basis that they would reduce traffic, as residents would walk into Trowbridge rather than using their own vehicles. No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1570	Consultee Ms Anna Reali	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Accessibility The A361 is a blackspot for accidents both "In the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1571	Consultee Ms Anna Reali	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment The fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foxes, badgers, many bird species and rare foraging bats.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1572	Consultee Ms Anna Reali	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment The fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foxes, badgers, many bird species and rare foraging bats.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1573	Consultee Ms Anna Reali	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment The fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foxes, badgers, many bird species and rare foraging bats.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1574	Consultee Ms Anna Reali	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1575	Consultee Ms Anna Reali	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1576	Consultee Ms Anna Reali	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1577	Consultee Ms Anna Reali	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129302	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1578	Consultee Peter Glasson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 692980	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In your proposals to build 40 houses you state that the B3098 is a peaceful road. This is not the case. It is very busy and extremely dangerous. As my house borders on this road I am in a position to attest to this. May I suggest that you get your road department to monitor vehicle activity to confirm this.</p> <p>Also you state that there are 800 dwellings in Bratton. To my knowledge which includes visiting every house or flat owner distributing leaflets there are no more than 500.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1579	Consultee Hazel Macgregor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129320		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I've lived in Crudwell for a number of years, and feel that the development proposed for the village is ill thought and too invasive. Adding another 40 houses to the site raises all sorts of issues: an increase of traffic on a country lane that has no pavements for pedestrians				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1580	Consultee Hazel Macgregor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129320		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I've lived in Crudwell for a number of years, and feel that the development proposed for the village is ill thought and too invasive. Adding another 40 houses to the site raises all sorts of issues: added to the 10 houses already being built there will be increasing the pressure on the infrastructure We're a small village of around 250, so to absorb this number of houses will not be easy - our village school is already oversubscribed, we've suffered serious flooding in the past few years				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1581	Consultee Hazel Macgregor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129320		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I've lived in Crudwell for a number of years, and feel that the development proposed for the village is ill thought and too invasive. Adding another 40 houses to the site raises all sorts of issues: I suspect that most of the residents of the new homes will be employed elsewhere - I was under the impression that new development would only be supported by Wiltshire Council if they improved employment opportunities, services and facilities. I guess my main issue is that for various reasons we don't have the protection and strategy of a Neighbourhood Plan, so we're being taken advantage of. What really should be happening is allow us to create our Neighbourhood Plan so that a comprehensive survey followed by an analysis of how Crudwell can be produced. Once we know the limitations and opportunities, then sensible development guidelines can be put in place. I genuinely believe that there is room for development in Crudwell, especially mixed private/social housing that includes starter homes so my children can afford to live in the village they were brought up in, and homes for people like me who will want to downsize soon but have to leave the village. I just don't want another 40 houses foisted on us - it'll chnge the whole character of the place.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1582	Consultee Mrs Tina Jones Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Cricklade Town Council Person ID: 1051839		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Other: Community Area Topic Paper - Royal Wootton Bassett and Cricklade		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	c) Open Space at Long Close/Hall Close (I4 & I5) and Open Space at Waylands (J8 & K8) have been partly excluded from the settlement boundary "... to exclude area of land more closely related to the open countryside." However, The DCNP excludes the whole of these areas of open space. We propose that these areas should be excluded to avoid the need for drawing artificial boundaries.				
Attached files (Please see Objective)	4709938				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The process of developing a Neighbourhood Plan for Cricklade continues and it is imperative that whenever the oral examination takes place, the inspector is fully aware of the most up to date information about the stage reached in the NP process				

Comment ID:	1583	Consultee Mr Richard Greenwood	Agent Richard Greenwood Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1119095	Benchmark Development Planning Ltd Person ID: 894742	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A.63	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Objection 1 to: Plan at p43 titled: "Durrington: Proposals for revised Settlement Boundaries"</p> <p>1. We object to the proposed revisions to Durrington's settlement boundary because of two fundamental flaws: Flaw 1 – the boundary proposed is unsound because it fails to be consistent across Durrington and Bulford.</p> <p>2. For example, there are two areas where the Authority has correctly applied their boundary criteria to include two fringe areas that are clearly part of their respective settlements – see BEN 0001: a) Durrington School and Leisure Centre (yellow) b) Western extent of Bulford (blue)</p> <p>3. However, we do not understand why Officers have not included the northwestern extent of Durrington (pink - see BEN 0001). We believe this decision has been contrived to favour their proposal for just 45 houses at H3.5 (more of which in our other objections) and not for sound planning reasons. Because the boundary has been contrived to exclude most of S98 (our client's land) we consider the revised boundary plan has not been positively prepared, nor has it been justified why it excludes S98 – rendering the boundary plan – ineffective and inconsistent with national policy that requires sufficient land to be allocated to provide a 5-year housing land supply and to provide sufficient deliverable land over the plan period in South Wiltshire.</p> <p>4. Proposed solution: See BEN 0002 identifies our preferred settlement boundary based on a clear understanding of the urban area.</p> <p>5. Justification: The criteria for defining settlement boundaries should be applied reasonably and consistently along easily identifiable and defensible features on the ground. Boundaries should be based on a clear understanding (not a muddled one) of the urban area. Boundaries should define what is and is not - going to be - part of Durrington. Those same boundaries must protect the open countryside from urban sprawl in the mid to long term. Clearly there is no point in excluding previously developed land that is obviously part of Durrington. We would include within this judgment some weight being given to residents' perceptions of whether 'their houses' are 'in' Durrington.</p> <p>Flaw 2 – Durrington's proposed boundary proposal is unsound because it fails to identify land to be allocated for development on the urban fringe of Durrington and Durrington's Conservation Area boundary.</p> <p>7. Proposed solution: Our plan BEN 0003 should replace the Authority's Proposed revisions to Durrington's boundary. It will allow an understandable and simple policy document – using old-style Local Plan Proposal Plans methodology – to show essential related designations side by side – overlaying each other where necessary, to deliver a positive, justified and effective simple and sound document that is much more consistent with national policy. It will be easier for the public to understand BEN 0003.</p> <p>8. New allocated sites should be identified alongside the settlement boundary because they will establish the new outer edge of the settlement boundary by 2026 (just 9 years away). Not including them now has already generated confusion amongst the public. Not including them</p>				

	<p>indicates the Authority may not believe them to be likely to be built in the plan period, undermining the Plan's clarity and, quite probably, public confidence in this document.</p> <p>9. It is also unsound not to include Durrington's Conservation Area boundary on the Durrington's settlement boundary plan because CAs identify the settings and important spaces around buildings and settlements. It is vital information of equal importance to settlement boundaries. Conservation Area boundaries should always be shown alongside the settlement boundary (see BEN 0002).</p> <p>10. Proposed solution: See BEN 0003 identifies a sound way forward based on a clear understanding of the urban area and the inclusion of site S98 at Hackthorne, Durrington for residential development.</p> <p>11. Justification: The criteria for defining settlement boundaries should be applied reasonably and consistently along easily identifiable and defensible features on the ground. Boundaries should be based on a clear understanding (not a muddled one) of the urban area and the need to provide sustainable housing development. Boundaries should define what is - and is going to be - part of Durrington by 2026. Those same boundaries must protect the open countryside from urban sprawl up to and after the end of the Plan period (2026). Clearly there is no point in excluding previously developed land that is already part of Durrington (see BEN 0002), that is not any longer part of the open countryside anymore.</p> <p>12. We are proposing a sustainable and balanced approach to the future of Durrington, by allocating site S98 that already falls within and on the urban fringe of Durrington at Hackthorne. Our Plan BEN 0003 will meet Durrington's and The Amesbury Community Area's housing need to 2026.</p> <p>By allocating further land the WHSAP will be more likely to meet the 5 Years Housing Supply for the Amesbury Community Area to the end of the period (2026) and housing generally in this area during the Plan period.</p> <p>To deliver this much needed housing there need to be several corrections to the currently unsound proposals for revisions to Durrington's Settlement Boundary in accordance with our other objections, including Objection 1 and our plans BEN 0001, 0002 and 0003 submitted today with this form.</p>
Attached files (Please see Objective)	4716538
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To explain to the Inspector the merits of this objection and to examine in public the Authority's case, as presented to the Examination (assuming the Authority to not accept our objections and modify the WHSAP).

Comment ID:	1584	Consultee Mr Richard Greenwood	Agent Richard Greenwood Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1119095	Benchmark Development Planning Ltd Person ID: 894742	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Objection 2 to: The Draft Housing DPD and whole supporting background documentation about housing, H3.5 and S98 and including The Sustainability Appraisal p106 - 111 titled: "Amesbury Community Area Topic Paper – Cabinet Version"</p> <p>1. We object to the Authority's Sustainability Appraisal of S98 at Hackthorne (Durrington) that concluded at Stage 4 that this site was – partially – less sustainable, because of two fundamental flaws: Flaw 1 – the assessment is unsound because it failed to understand available information leading to a biased Sustainability Appraisal and unduly harsh recommendation to remove most of S98 from H3.5. 2. The Authority's Sustainability Appraisal is a sequence of arbitrary and quite generalised judgements leading to a convenient and contrived conclusion about S98. We have tried to make it as easy as possible for the Inspector to understand our point of view by drawing together in one place the Authority's Sustainability Appraisal on S98 at their Stages 1, 2, 3 and 4 at our Appendix 1. It is important to note that this site passes all the Stages, except Stage 4. The Authority then state somewhat irrationally – before excluding the main part of S98, at Stage 4: "Assessment Results (for S98) No major adverse effects have been identified." See p106 of the Cabinet Report – at Appendix 1.</p> <p>3. We do not understand why Officers have not included ALL of S98 for a 100 – 140 much needed houses (red line - see BEN 2001 – at Appendix 2) if there are: "No major adverse effects." We consider the decision to split S98 and favouring just 45 houses at H3.5 (more of which in our other objections) is not based on sound, up to date and relevant planning information. Because the Sustainability Appraisal has been contrived to exclude most of S98 (our client's land) we consider the plan has not been positively prepared, nor has it been justified why it excludes most of S98 – rendering the plan – ineffective and inconsistent with national policy that requires sufficient suitable land to be allocated to provide a 5-year housing land supply and to provide sufficient deliverable land over the plan period in South Wiltshire.</p> <p>4. Proposed solution: See BEN 2001 at Appendix 2 that identifies our preferred settlement boundary around the allocated site S98 that should become part of an enlarged Site H3.5 based on a clear understanding of the settlement and a revised Sustainability Appraisal.</p> <p>5. Justification: The Sustainability Appraisal criteria for assessing potential housing sites should be applied reasonably and consistently based on a clear understanding (not a muddled one) of the area (see our Sustainability Appraisal at Appendix 3 etc).</p> <p>6. Flaw 2 – Proposed H3.5 Clover Lane is unsound because it fails to allocate 1,783 sqm (0.18 ha) of land that passes their own Sustainability Appraisal (with flying colours) near the Stables and adjacent land all within S98.</p> <p>7. Proposed solution: Our plan BEN 2002 at Appendix 4 identifies the parcel of 0.18 ha land that the Authority may have by error failed to include within their own assessment of H3.5. Our plan also includes the 0.59 ha parcel of S98 already allocated within H3.5 (total area 0.18 + 0.59 = 0.77 ha).</p> <p>8. Overall Objection 2 Conclusions:</p>				

	<p>We are proposing a sustainable and balanced approach for the future of Durrington, by allocating all site of S98 and H3.5 within and on the urban fringe of Durrington at Hackthorne. Our Plan BEN 2001 at Appendix 1 will meet Durrington's and The Amesbury Community Area's housing need to 2026.</p> <p>By allocating further land the WHSAP will be more likely to meet the 5 Years Housing Supply for the Amesbury Community Area to the end of the period (2026) and housing generally in this area during the Plan period.</p> <p>To deliver this much needed housing there need to be several corrections to the currently unsound proposals for revisions to Durrington's Settlement Boundary and proposed housing allocations at H3.5 and H3.6.</p>
<p>Attached files (Please see Objective)</p>	<p>4716855 / 4716856 / 4716842</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To explain to the Inspector the merits of this objection and to examine in public the Authority's case, as presented to the Examination (assuming the Authority to not accept our objections and modify the WHSAP).</p>

Comment ID:	1585	Consultee Mrs Mary Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106010		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding</p> <p>Increased runoff from south side of Neatherhampton Rd into flood plain will risk houses in H3.3 and Netherhampton becoming uninhabitable, unsafe, uninsurable and unsaleable. Harnham flood protection plan not going ahead so houses in Harnham also at risk.</p> <p>Look to build away from the flood plain, not disgorging 1,000 cars twice a day onto a B road with bridges at both ends (even a link to Shaftesbury Drove will only be a diversion back to Coombe Rd unless everyone is travelling to Dorset!)</p> <p>Proper consultation over changes to infrastructure which should be specific, detailed, achievable, measurable and timely. These current documents lack specifics.</p> <p>The council needs to demonstrate that residents lives will not be adversely impacted by gridlock or their homes flooded (more often).</p> <p>A plan linking to major road systems north and south would be more sound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1586	Consultee Mrs Mary Cole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1106010		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Flooding</p> <p>Increased runoff from south side of Neatherhampton Rd into flood plain will risk houses in H3.3 and Netherhampton becoming uninhabitable, unsafe, uninsurable and unsaleable. Harnham flood protection plan not going ahead so houses in Harnham also at risk.</p> <p>Look to build away from the flood plain, not disgorging 1,000 cars twice a day onto a B road with bridges at both ends (even a link to Shaftesbury Drove will only be a diversion back to Coombe Rd unless everyone is travelling to Dorset!)</p> <p>Proper consultation over changes to infrastructure which should be specific, detailed, achievable, measurable and timely. These current documents lack specifics.</p> <p>The council needs to demonstrate that residents lives will not be adversely impacted by gridlock or their homes flooded (more often).</p> <p>A plan linking to major road systems north and south would be more sound.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1587	Consultee Mr Slater Reynolds Person ID: 396105	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>(1) Positively prepared - In regard to my submission the proposal lacks local understanding.</p> <p>(2) Justified - Based on wrong information</p> <p>(3) Effective - Arising from (1) & (2) impossible</p> <p>(4) Consistent with national policy - Bad information and interpretation might result in a breach of national policy.</p> <p>There has to be a risk that if legislation drives a particular course there might be a case to answer if inappropriate measures are taken, outside the primarily intended framework established under that legislation, to provide a result not created within the main intention of parliament.</p> <p>I am not aware that the above relates to my particular issue.</p> <p>PLEASE SEE ATTACHED SUBMISSION [inserted below] BY Mr & Mrs Reynolds and that included in respect of immediately adjacent ground owned and occupied by Mr WVG Hall of Clyffe Hall Market Lavington.</p> <p>I now write on behalf of my wife and I to object to the detailed Red edging indicated on the Market Lavington Proposals for Revised Settlement Boundaries as it directly affects our ownership and right of way at this address. Plan No 1 shows our ownership edged Green; our right of access to this property coloured Brown and shared ownership of 41 The Spring edges Orange. I would ask that our plans be read with the Settlement Boundary Revision Plan for Market Lavington. For purposes of the mutual convenience of my neighbour Mr W V G Hall and Wiltshire Council included also in the submission is a proposed revision relating to a small piece of land within the kitchen garden of Clyffe Hall coloured Yellow on Plan No 3A.</p> <p>Introduction</p> <p>The whole of this land was, and indeed part still is, owned with Clyffe Hall, positioned to the West where the house and a small piece of land surrounding it is edged Red under the revised proposals.</p> <p>In the late 1950's two broiler house units for chicken meat production were erected on the site of our house and were in production until one burned down in 1995. Plan No 1 shows their positions within the subject site edged Green.</p> <p>In 1996 planning permission K/032707 was granted to build our present house on the basis that the other undamaged broiler house was demolished. Of course the reason our planning application was agreed was because a residential use of the site was preferable to the smelly, noisy chicken fattening units.</p> <p>The planning permission K /032707 granted (copy enclosed), and it was our expectation anyway, designated land area lying North of the Lavington School playing field and bounded to the East by the Lavington School access road and in the West by Clyffe Hall ownership as amenity ground associated with Parsonage Mead (condition No 09). The accepted reason for the land designation of our garden/amenity ground was to be sure that we would not seek to replace the chicken houses after our dwelling was completed. New chicken houses would have required planning permission because the land was no longer designated as agricultural. Planning legislation has since changed.</p> <p>The later work creating the existing village boundary plan adopted by Kennet District Council used as their village boundary the line of the South wall of the Southerly chicken house the OS extract shows the buildings and of course you have the County Proposals dated 2017 edging the</p>				

2002 village boundary Blue more or less accurately. This Kennet designation does not reflect the natural and actual use made of the land edged Green in Plan No 1

We objected to the Kennet draft plan a single copy of which I hold but may well be available from Wiltshire records only in minor detail as to certain of the boundary lines shown but lost the majority of our submission which is why the village boundary as it now exists takes arbitrary lines across our immediate garden and amenity area which have since received appropriate planting. It would really be much better if the revised village boundary that I propose in respect of the amenity land attached to this house uses natural existing hedge and fence delineations but that is less vital than maintaining at least those created in 2002.

The Inspector found for us in regard to our small set of buildings which he advised might be included within the revised village boundary with our house which we were living in by 2002. This 'U' shaped single storey timber, brick and tile structure is edged Pink on Plan No 3

Thus there has occurred a revision from agricultural to residential/amenity use over this ownership edged Green on Plan No 2 enclosed.

Submission A

You will readily appreciate that under the County's current proposals the garden area running with this house is thought appropriate to extend to the stream and that seems to us to be a pretty fair guess at what might be useful as garden ground with this property based on a common urban configuration but is not suitable here with the important established boundaries as they exist and the opportunity given to us and later gardeners. It does look as if there might be some confusion as to land use associated with Parsonage Mead where our garden and amenity area have been excluded from within the village boundary because the ground is still thought to have an agricultural connotation.

The Kennet boundary along the South did not recognise the natural needs of the house as I have said and so far as our planting associated with this property affects the matter as indeed it must we would submit that the new village boundary ought to run along the stream for the full width of the present ownership so that at least this land here is secure within the village boundary and properly regarded as land running with Parsonage Mead.

However none of the land included within the planning permission for Parsonage Mead either side of the stream can be separated from Parsonage Mead because it is so important to the best enjoyment of the house.

Access to the area South of the stream is only available over good culverts presently. Although it would be a major alteration to the settlement limits really the line ought to extend to the playing field boundary to our South.

I should explain that we have purchased 25 The Spring, Market Lavington as a 'downsizing exercise' and have obtained planning permission (reference 17/01098/FUL) to construct an extension onto this chalet/bungalow using land running with Parsonage Mead which blocks the highway access to the subject land edged Green on Plan No 1. The planning department was somewhat reluctant to grant the permission we sought because the land was thought to be agricultural but fortunately our permission conditions for this house referred to above were considered appropriate to allow the development. Our permission was granted long after the new revised settlement boundaries were proposed some months ago.

In purchasing 25 The Spring, constructing our extension to the building and forming a garden area to the South and West, we have blocked the opportunity to develop South of 27, 29 and 31 The Spring; a suggestion put to us on a number of occasions.. We would ask that, since the designated land use will continue, the new village boundary be moved at least to the stream, but preferably using the playing field boundary already referred to, and by using also as the boundary the ownership onto the playing field road on the East. Plan No 2 shows our request edged Green. I do hope that you will understand that by physical action we minimise the opportunity to develop the existing garden running with this house but do need County support to allow its use as 'within' the village exactly as intended by our original Permission envisaged in 1996 when the agricultural use was abandoned.

Lastly on this matter I would say that the garden ground we are retaining with 25 The Spring extends from The B3098 to the stream for ground source heating; the new owner of Parsonage Mead will be granted amenity rights over our garden in order to have access to his paddocks for special purposes.

Parties are happy for all matters to be separately considered but really the basic submission is pretty similar as to each aspect. We are looking for the most appropriate designation for the relevant land areas.

We understand that there are great number of words used in making this submission for which we apologise but the matter does have planning history and the current proposals appear to seek to limit existing use designations by giving guidance for the future never intended originally.

Attached files (Please see Objective)	4717869 / 4717861
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The purpose of changing the boundaries is incorrect in the circumstances of the ownerships in question because the circumstances on the ground are not appropriately supported by the community boundary lines chosen. Verbal exchange is desirable in these instances.

Comment ID:	1588	Consultee Mr Slater Reynolds Person ID: 396105	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.3			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>(1) Positively prepared - In regard to my submission the proposal lacks local understanding.</p> <p>(2) Justified - Based on wrong information</p> <p>(3) Effective - Arising from (1) & (2) impossible</p> <p>(4) Consistent with national policy - Bad information and interpretation might result in a breach of national policy.</p> <p>PLEASE SEE ATTACHED SUBMISSION [inserted below] BY Mr & Mrs Reynolds and that included in respect of immediately adjacent ground owned and occupied by Mr WVG Hall of Clyffe Hall Market Lavington.</p> <p>Submission B</p> <p>I now refer to a very small area of the new Market Lavington Boundary Proposal.</p> <p>The new settlement boundary has been drawn in the most odd way at and near our access point onto the B3098 and we just cannot understand why so close to and associated with the very busy junction of the Lavington School junction with the B3098 road. Of course the County do regard the Lavington School land East of the present school buildings as suitable for residential development and my understanding is that highway access to this land will be via the existing school drive.</p> <p>Please see Plan Nos 3 & 3A which indicates the following;</p> <p>Part of Parsonage Mead edged Green as in Plan No 1,</p> <p>The access to Parsonage Mead edged Brown.</p> <p>41 The Spring edged Orange</p> <p>The 2002 Kennet village boundary shown Blue</p> <p>'U' shaped buildings, part of Parsonage Mead, edged Pink</p> <p>The proposed Wiltshire Market Lavington Settlement boundary in Red is shown on Plan 3A.</p> <p>Access to greenhouses coloured Yellow on plan 3A</p> <p>The County proposal is to exclude the 83098 from the village at our access way to this house and the frontage of 41 The Spring, although there is the pedestrian pavement on the South side, such that our access would be outside the settlement boundary but our land and buildings within it. The county proposal would appear to us to be a contrived proposal which is pretty nearly impossible to see on the published plan and we really cannot find out why it was drawn in this way - we have been advised to 'make a proposal' under the relevant provisions at the exhibition day held in Devizes in order to find out. However our proposal is an actual submission for a change in the boundary line shown.</p> <p>Whatever the thinking that proposes a complicated piece of edging the consequence is to place a different basis for thinking, in planning terms, how a short length of private drive - about 18 m - should be used to the house and associated buildings it serves. This may be a mistake but might in the future affect an intention we have to improve the access situation for 41The Spring by creating a driveway into the North garden and indeed the building edged Pink.</p>				

	<p>We would be grateful if you would consider including the full length of the drive within the settlement boundary and the adjacent part of the 83098 thus allowing 41 The Spring the same planning considerations as the other dwellings fronting onto The Spring as well as Parsonage Mead, our house and the buildings with it..</p> <p>We have referred already to the designation of garden/amenity land running with Parsonage Mead but also ought to ask that the 83098 be included within the settlement boundary to the playing field access way as the Green edged land fronts onto this road; of course this frontage is now forming the garden and access for 25 The Spring discussed above.</p> <p>Parties are happy for all matters to be separately considered but really the basic submission is pretty similar as to each aspect. We are looking for the most appropriate designation for the relevant land areas.</p> <p>We understand that there are great number of words used in making this submission for which we apologise but the matter does have planning history and the current proposals appear to seek to limit existing use designations by giving guidance for the future never intended originally.</p>
<p>Attached files (Please see Objective)</p>	<p>4717869 / 4717861</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The purpose of changing the boundaries is incorrect in the circumstances of the ownerships in question because the circumstances on the ground are not appropriately supported by the community boundary lines chosen. Verbal exchange is desirable in these instances.</p>

Comment ID:	1589	Consultee Mr Slater Reynolds	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 396105	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>(1) Positively prepared - In regard to my submission the proposal lacks local understanding. (2) Justified - Based on wrong information (3) Effective - Arising from (1) & (2) impossible (4) Consistent with national policy - Bad information and interpretation might result in a breach of national policy. PLEASE SEE ATTACHED SUBMISSION [inserted below] BY Mr & Mrs Reynolds and that included in respect of immediately adjacent ground owned and occupied by Mr WVG Hall of Clyffe Hall Market Lavington. Submission 3 I now refer also to a strip of land within the Clyffe Hall kitchen garden area shown Yellow on Plan No 3A. Mr Hall feels that it would provide a more successful village delineation if the strip which contains pedestrian access at its Northern end from the highway to the greenhouses within the garden, which are themselves include within the settlement area, is included as well. Along the full length of the drive passing the kitchen garden land is a brick wall so this access way is important to the ability to reach the greenhouses built along this wall from the corner entrance. This is a small case of practical garden amenity management. Independently of the submission in the previous paragraph it is important to us that the settlement boundary is taken at least along the wall on the West side of our entrance way in order that Parsonage Mead has the same rights of access to the highway as houses normally have within the Red edging shown on the Country proposal. Similarly there must be a potential worry about access to 41The Spring which lies East of the access drive referred to above. This is the same point as that above but might be considered beneficially with this section too. It will be seen that the little 'U' shaped building is within the proposed settlement boundary and we have recently made enquiry about its future use. This listed structure (a listing relating to that of Clyffe Hall originally) is regarded as suitable in principal for residential use subject to stringent conditions and so we want to arrange vehicular access within the Market Lavington Plan. For this additional reason we would request that the settlement boundary be located on the Western side of the access way during its initial run to our property from the 83098. It is considered much more sensible to relocate the vehicular access into 41 The Spring directly off the 83098 rather than down the access we share which is why we think it better for our needs and for those using the footpath for this length of highway to be within the settlement boundary. Parties are happy for all matters to be separately considered but really the basic submission is pretty similar as to each aspect. We are looking for the most appropriate designation for the relevant land areas. We understand that there are great number of words used in making this submission for which we apologise but the matter does have planning history and the current proposals appear to seek to limit existing use designations by giving guidance for the future never intended originally.</p>				
Attached files (Please see Objective)	4717869 / 4717861				

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The purpose of changing the boundaries is incorrect in the circumstances of the ownerships in question because the circumstances on the ground are not appropriately supported by the community boundary lines chosen. Verbal exchange is desirable in these instances.

Comment ID:	1590	Consultee Mr Richard Greenwood	Agent Richard Greenwood Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1119095	Benchmark Development Planning Ltd Person ID: 894742	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.6 Larkhill Road, Durrington		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Objection 4: Site H3.6 Land at Larkhill Road, Durrington</p> <p>1. We support the allocation of proposed Housing H3.6 at Larkhill Road, owned by the Objector. It is suitable, available and viable for immediate housing development.</p> <p>2. The owners of H3.6 also own all the land down the River known as Site 3179.</p> <p>3. At Stage 4 of the Sustainability Appraisal, Site 3179 was assessed and it was recommended the northern part of the site be allocated for housing. The key part of that plan is below: [map extract – refer to attachment]</p> <p>4. The Draft Housing DPD might allocate a slightly different site in the area the Vets on the eastern side of 3179: [map extract – refer to attachment]</p> <p>5. In any event, this Objection confirms that the area shown in red is owned by the objector and it is respectfully requested that it is added back into H3.6: [map extract – refer to attachment]</p> <p>6. We are therefore asking for H3.6 to be amended as follows – see yellow shade: [map extract – refer to attachment]</p> <p>By allocating further land the WHSAP will be more likely to meet the 5 Years Housing Supply for the Amesbury Community Area to the end of the period (2026) and housing generally in this area during the Plan period. To deliver this much needed housing there need to be several corrections to the Draft Housing DPD.</p>				
Attached files (Please see Objective)	4716754				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To explain to the Inspector the merits of this objection and to examine in public the Authority's case, as presented to the Examination (assuming the Authority to not accept our objections and modify the WHSAP).				

Comment ID:	1591	Consultee Amy Barron	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129432		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to lodge my objection to the Ridgeway Farm site allocation (consultation closes 22 September 2017). As a resident of Crudwell village, I feel that an addition of 40 new houses (representing a 20% increase in dwellings in the village) is far too demanding on the fragile infrastructure of our village. I welcome the chance to set out my views and to participate in a fair consultation process.</p> <p>The main points of my objection are listed below, in no particular order:</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell.</p> <p>A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p> <p>Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met.</p> <p>Crudwell is not anti-development; it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan, not via the whims of local landowner wishing to make a profit.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1592	Consultee Amy Barron	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129432	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1593	Consultee Amy Barron	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129432		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1594	Consultee Amy Barron	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129432		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell Primary School is already greatly oversubscribed with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields. The school's ability to expand is not guaranteed and the governors and teachers have already expressed concern and noted their inability to expand in the short term.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1595	Consultee Amy Barron	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129432		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village. In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell in not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1596	Consultee Ms Susan Mawer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126176		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3		Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTRARY TO HOUSING DELIVERY STRATEGY</p> <ul style="list-style-type: none"> • The Housing Delivery Strategy describes the proposed allocations as being “in Salisbury”, whereas the locations lie within Netherhampton Parish. These allocations are therefore contrary to the stated policy of focusing on higher tier settlements in the pursuit of “sustainable development”. • Para 4.16 of the Draft Allocation Plan: “ 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1597	Consultee Ms Susan Mawer Person ID: 1126176	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>INSUFFICIENT TRANSPORT & GREEN INFRASTRUCTURE • Para 5.128 of the Draft Allocation Plan says: “ • Housing development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”</p> <p>The Salisbury Transport Strategy contains measures to support the scale of growth envisaged by the WCS”. This is simply not true. The “Salisbury Transport Strategy” (a summary produced in November 2012, which was not subject to any formal consultation or adoption process) acknowledged that the Harnham Gyrotory and Wilton Wall Lights junctions were operating very near to or at capacity. Since then traffic has increased considerably and there is no new plan in place to accommodate this increase, let alone the increase that would occur of the Netherhampton Road allocations are allowed.</p> <p>Indeed, it is acknowledged in Para 5.136 that the current Transport Strategy does NOT contain measures to support the proposed allocations: •“Comprehensive improvements to the local and strategic road network would be necessary to safely accommodate development where the residual cumulative impacts are severe. (...) To address such matters, dialogue with Highways England will be required and work would take place in conjunction with a refresh of the Salisbury Transport Strategy.”</p> <p>It should also be noted that such “Salisbury Transport Strategy” as exists is not detailed and has never been subject to public consultation or formal adoption.</p> <p>Any talk of road improvement or widening is specious given a/ that widening is not possible along much of the A3094 and b/ that the problem lies in the pinch points at either end.</p> <p>We have heard cavalier talk from City Councillors as to how the Harnham Gyrotory capacity could be increased by having no traffic lights and / or by installing pedestrian underpasses. That such vague “solutions” should be being bandied around demonstrates that the traffic problems that Netherhampton and Harnham residents already face are not being addressed seriously, and that the likely implications of the proposed housing allocations are not being seriously thought through.</p> <p>There is no adopted Green Infrastructure (GI) Strategy in place, which means that the impact of the proposed new dwellings is impossible to assess.</p> <p>We feel strongly that in proposing new locations for dwellings without having seriously considered Transport and Green Infrastructure, Wiltshire Council is putting the cart before the horse. Previous experience tells us that there is a huge risk that new dwellings might approved with new transport and GI arrangements only following on piecemeal or not at all.</p> <p>Page 161 of the South Wiltshire Core Strategy (which covers the S1027 and S1028 locations) states that "No development will be permitted until such time as detailed transportation measures including improvements to the local road network have been submitted to and approved by the Council". There is no evidence that this has been carried out.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.

Comment ID:	1598	Consultee Ms Susan Mawer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126176		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLOOD & SEWAGE IMPACT</p> <p>Drainage too is a huge issue. Netherhampton and all of the fields to the north of the A3094 are routinely inundated following even a few days of heavy rain (see attached picture from Sunday 23rd July). Our understanding from drainage engineers is that the problem is that the infrastructure to move water away from the valley is substandard all the way down to Christchurch. Given that, the impact of up to 640 dwellings (Site S1028) plus 100 dwellings (Site S1027) and associated hard standing will be a massive increase in run off which will impact both downstream and upstream of the proposed sites.</p> <p>Site S1027 is well known locally for having standing water regularly during the winter.</p> <p>There is no clear strategy for ensuring that sufficient sewage pumping infrastructure is in place to deal with the impact of the proposed new dwellings. The existing sewage pumping infrastructure is already operating at capacity.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1599	Consultee Ms Susan Mawer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126176		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		NOISE A much smaller proposal in 2014 for around 70 houses plus a pub/hotel on a site along the Netherhampton Road was withdrawn after it was proved that vehicle noise from the A3094 would exceed Government guidelines. There is no evidence that consideration has been given to the much greater impact from 740 or more dwellings.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.			

Comment ID:	1600	Consultee Ms Susan Mawer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126176		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>FLAWED PROCESS</p> <p>We are told by planners that the key thinking informing the vastness of the 640 dwelling site (S1028) is around “critical mass”. A perfectly good site for 200 or so houses in Odstock has been rejected by the planners simply because that site could not “sustain” a new school. This seems to be a rationale that is not in fact part of the planners brief and is thus a failure of process.</p> <p>The National Planning Policy Framework (NPPF) includes a key principle “to encourage the effective use of land by reusing land that has been previously developed (i.e. brownfield land)...”. The Draft Housing Allocation Plan does not explain why housing planned for brownfield sites such as The Maltings and the Engine Shed is being delayed.</p> <p>The NPPF protects high quality agricultural land such as the proposed sites on Netherhampton Road, but no weight appears to have been given to this in the Draft Housing Allocation Plan.</p> <p>The proposed sites along the Netherhampton Road are described as being within the “settlement area” of Salisbury but lie in fact outside the Salisbury Community area, and in Netherhampton Parish. Since coherent Community Areas are key to the Wiltshire Core Strategy, we believe that the Housing Site Allocation Plan cannot be sound given the boundaries that currently pertain.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1601	Consultee Ms Susan Mawer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126176		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3		Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>VISUAL AMENITY / HERITAGE LANDSCAPE</p> <ul style="list-style-type: none"> The proposed sites along the Netherhampton Road were previously removed from consideration in the Wiltshire Core Strategy, at least partly because of the negative impact on the unique view of the city and the cathedral spire from the south and west. In assessing the propose sites the planners have given no serious consideration to the severe impact that the proposed development would have on what is a priceless landscape and heritage asset. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1602	Consultee Ms Susan Mawer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126176		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Nos. H3.1 and H3.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Consistent with national policy</p> <p>GENERALLY ILLOGICAL No thought appears to have been given to the possibility of expanding the Britford School instead of building a new school. The Core Strategy acknowledges that the key employment sites in Salisbury are to the North. We are completely perplexed as to how, in that case, locating up to 740 new houses in a rural village to the south of the city, in locations which are stuck between intractable traffic points and which are subject to all of the above perfectly reasonable grounds for objection, can make any sense at all.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The consultation has been drawn up without proper regard for the many considerations I have outlined. The impact of these plans on residents will be very significant and I believe that it is vital that the Council is held to account and made to give careful thought to the impacts BEFORE it adopts this Housing Site Allocation Plan.				

Comment ID:	1603	Consultee Malaby Holdings	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 556400	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.8		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Proposed allocation: the proposed allocation of Bore Hill Farm under Policy H2 is supported in principle. This follows a collaborative approach that has been undertaken between Malaby Holdings and Wiltshire Council following the acquisition of the site in 2009.</p> <p>Policy H2.8 and Paragraph 5.93: the land area extent set out in Policy H2.8 and Paragraph 5.93 is incorrectly stated as 4.74ha. The correct extent of the allocation site is 5.14ha. This is shown on the enclosed Site Location Plan (Plan Ref: 1190-E-001).</p> <p>Fig 5.5: there is an error in the extent of the redline allocation site in Fig 5.12. a Corrected Development Plan Allocation Boundary is enclosed (Plan Ref: 1190-E-001).</p> <p>Table 5.3 and Paragraph 5.93: the suggested quantum of development, 70 dwellings, is considered to be too conservative. A preliminary capacity design undertaken by Keep Architects indicates that the whole allocation site could accommodate 110-120 dwellings.</p> <p>Land ownership: the Bore Hill Farm site (4.6ha) is in the freehold ownership of Malaby Holdings (SHLAA Ref: 1032). The adjoining land at Bradley Road (0.54ha) is in separate ownership of Keysley Ltd (SHLAA Ref: 302). We can confirm on behalf of both landowners that the subject site is available for residential development and that they intend to coordinate work regarding the site promotion in consultation with the Council.</p> <p>Site context: the whole site measuring 5.14ha lies approximately 1.4km to the south of the Warminster town centre. The site is bounded by existing residential development at Ludlow Close, Bradley Close and Bradley Road to the north; Deverill Road to the east; the A36 Warminster bypass to the south; and the Bore Hill Biodigester to the south west.</p> <p>Summary of planning and site promotion history: part of the site has been developed to accommodate the Bore Hill Biodigester (LPA Ref: W/10/03967/WCM). The planning permission also makes provision for a Phase 2 employment development and access road located adjacent to the biodigester. Initial ground preparation works and site levelling relating to the Phase 2 employment development were completed in 2016.</p> <p>A third-party developer, David Wilson Homes (DWH), submitted a pre-application enquiry to Wiltshire Council (Ref: 13/03407/PREAPP). Subsequently Malaby Holdings have decided to promote the site themselves and will seek a niche / regional housing partner as opposed to a national volume home builder in order to deliver a more diverse and exemplary scheme of housing.</p> <p>A full technical evidence base has been prepared, and is continuing to be developed on an iterative basis:</p> <ul style="list-style-type: none"> topographical survey; an access feasibility proposal with new design for priority junction from Deverill Road (WYG); site levels and drainage (SLR) ecology assessment (Engain); strategic landscape appraisal (MacGregor Smith); heritage assessment (Heaton Heritage Consultants); and a capacity / urban design study (Keep Architects) <p>Vision for the site: A comprehensive vision for the site is in the process of being formulated. Malaby Holdings are open to the site accommodating a mix of live-work and custom-build housing, and houses designed for occupation by elderly persons.</p>				

	<p>It is also proposed that new employment space (buildings and serviced plots) will be delivered as part of comprehensive masterplan for the whole site. The employment layout is shown in the enclosed illustrative layout plan (Ref: 1170-F-001).</p> <p>The mixed-use housing and employment proposal intends to take advantage of the existing on-site renewable energy potential through the provision of direct renewable heat and electricity from the adjacent Biodigester (subject to design and regulatory approval).</p> <p>The proposal will also include strategic landscaping and drainage proposals, and an access and movement strategy.</p> <p>Statement of Common Ground: Malaby Holdings are currently in the process of reviewing residential delivery options, and will be formulating a vision for the whole site, which will be underpinned by an updated technical evidence base.</p> <p>It is proposed that a further pre-application enquiry will be submitted and that a Statement of Common Ground will be agreed with the Council in advance of the publication of the 'Submission' version of the draft Wiltshire Housing Site Allocations Plan in 2018.</p> <p>Bore Hill Farm, Policy H2.8</p> <p>Table 5.3 and Paragraph 5.93: amend the quantum of development to approximately 110 dwellings.</p> <p>Policy H2.8, Fig 5.12, and Paragraph 5.93: the land area extent set out in Policy H2.8 and Paragraph 5.93 is incorrectly stated as 4.74ha. The correct extent of the allocation site is 5.14ha.</p>
<p>Attached files (Please see Objective)</p>	<p>4716878 / 4716877</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Malaby Holdings wish to be represented at the examination to assist the consideration of the technical issues, and to answer any technical or planning policy related queries that may be raised in the round table discussion by interested parties.</p>

Comment ID:	1604	Consultee Mr Richard Greenwood	Agent Richard Greenwood Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1119095	Benchmark Development Planning Ltd Person ID: 894742	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Objection to: Draft DPD including proposed housing numbers within South Wiltshire Housing Market Area, including all the supporting Topic Papers where they deal with, inter alia, the 5-year housing land supply, Central Car Park (Salisbury), Churchfields, H3.1, H3.3 and H3.4 Rowbarrow.</p> <p>By allocating further land the HWSAP will be more likely to meet the 5 years housing supply to the end of the period (2026) and housing need generally in this area during the Plan period. To deliver this much needed housing there need to be several corrections to the draft Housing and Settlement Boundary DPD.</p> <p>Objection to Draft DPD including proposed housing numbers within the South Wiltshire Housing Market Area, including all the supporting Topic Papers where they deal with, inter alia, the 5-year housing land supply, Central Car Park (Salisbury), Churchfields, H3.1, H3.3 and H3.4: Rowbarrow. We are also objecting to the proposed Settlement Boundary for Salisbury.</p> <p>In this statement, we promote further housing development for 100 dwellings (including more than 50% affordable) at a new site to be known as H3.7 Britford Park & Ride.</p> <ol style="list-style-type: none"> 1. In our opinion, insufficient land is proposed to be allocated to meet the minimum housing requirement set out in the adopted Wiltshire Core Strategy (2015). We are therefore proposing the allocation of 100 dwellings at H3.7: Britford Park & Ride. The land is available, suitable and viable – see annotated plans and photographs at Appendix 1. 2. Despite the resilience testing of the Draft DPD – set out in the Topic Paper 4: ‘Developing Plan Proposals’ - we are not convinced by those judgements and consider that insufficient land is being proposed for housing development. As a result, there is a strong likelihood of an unnecessary shortfall in supply to the rolling 5 Year Land Supply. 3. Furthermore, we are close to a possible change to the way housing figures are assessed. We understand (early September 2017) the Government will publish a consultation document setting out details for a standard method for assessing housing need. This has been delayed and is now expected by the end of September 2017. We therefore reserve comment and may add further to this objection, in the light of the anticipated new advice. 4. We now set out the main points of our case that we are likely to expand upon at the Examination. First, we need to set the scene. 5. Core Policy 2 of the WCS requires the County to accommodate at least 42,000 additional dwellings over the period 2006 to 2026. This places a minimum requirement on the South Wiltshire Housing Area for 10,420 dwellings, divided potentially, but not in a fixed way, roughly as follows: Summary of DPD Table at paragraph 2.17 (SEE ATTACHMENT) 6. Our point is this: sustainable well-planned and delivered development is quite possible within this community area at the newly titled: H3.7: Land at Britford P&R 7. We particularly note the WCS describes Salisbury as a thriving place where people want to stay that is attractive to new residents, businesses and visitors alike. 				

8. And yet we do not consider this draft DPD accords (i.e. it is not sound) with the WCS in this respect. Certainly, the Draft DPD does not accord with paragraph of the NPPF that sets out the Government's intention to "boost significantly the supply of housing". In our opinion, this Planning Authority should not seek to provide the minimum requirement (indeed we note in passing that the word 'minimum' is dropped all too easily from key parts of the draft DPD). Wiltshire council should instead meet the full objectively assessed housing need by:

- roviding five years' worth of housing with an additional buffer of 20% by including H3.7: Britford P&R for 100 dwellings;
- And / or identifying land at H3.7 to assist with the supply of specific, developable sites or broad locations for growth, for year 6–10, and where possible, for years 11–15. (Alarmingly, the Council has no published housing plans for post-2026 – just 8 years or so away);
- Providing a housing trajectory for the plan period to describe how the Authority will maintain delivery of a five year + 20% to the end of the plan period: currently the Draft DPD fails – see table below:

Summary of Table at para 4.32 of 5 Year Housing Land Supply (SEE ATTACHMENT)

9 Paragraph 55 of the NPPF also, amongst several criteria, promotes the optimisation of the potential of sites to accommodate development and there is an emphasis on re-using previously developed land – such as the P&R at Britford.

10. We would like to draw the Inspector's attention to two matters – deliverability' and 'developability': we are not convinced the Authority has assessed fairly or soundly the potential housing land that they consider will be developed before 2026 at:

- x Central Car, Salisbury (CP 2 and CP 21 of WCS for 200 dwgs) – Benchmark's opinion: This site is neither deliverable or developable as matters stand in September 2017. This site is too complicated and unrealistic and mired in viability and delivery/developability problems. There is no realistic prospect this site will be redeveloped before 2026 (just c. 8 years away).
- x Churchfields, Salisbury (CP 2 of WCS for 1,100 dwgs) – Benchmark's opinion: neither deliverable or developable as matters stand in September 2017. Likewise, and even more so than Central Car Park: too complex and unrealistic and not viable. It is a laudable goal but incredibly difficult to achieve without major intervention. And this should be done now. (Compulsory Purchase Orders, if started today, (none are now to be in the 'offing') might yield vacant possession, in 15 years' time, precedable over another 10 years, for the first 100 houses to be built in 2040 – at the earliest (if it ever happens).)
- x Netherhampton Rd, Salisbury (H3.1 and H3.4 of draft DPD for 740 dwgs) – Benchmark's opinion: neither deliverable or developable as matters stand in September 2017. Too controversial with sensitive issues regarding traffic, ecology and heritage – and public opinion. Not deliverable before 2026 – perhaps after 2035.
- x Rowbarrow, Salisbury (H3.4 100 dwgs H3.) – Benchmark's opinion: neither deliverable or developable as matters stand in September 2017. Too controversial with sensitive issues regarding traffic, ecology and heritage (setting of the Cathedral) – and public opinion. Bad site – unsuitable - it should be dropped (see landscape and visual impact statement at Appendix 2).

11. We do not consider the Authority's application of Footnotes 11 and 12 of NPPF that define the deliverability and developability of these 4 arguably key potential sites, has been sound enough. This is what should have been assessed. The Footnotes state:

"(11) to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular the development of the site is viable...

(12) to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."

12. Even taking into account the Council's resilience testing in Topic Paper 4: 'Developing Plan Proposals' – there could easily be a shortfall of 200 + 1,100 + 40 + 100 dwgs = 2,040 dwellings.

13. The impact of the loss of about 2,000 dwellings (about 20%) out of the Authority's ability to provide a 5-year rolling supply of housing land could be severe: developers would be able to try to promote sites already excluded via the SHLAA process in the light of paragraph 49 of the NPPF:

"Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites."

14. To begin to build more stability into the housing figures, we are suggesting the Council do more than aim to meet the minimum requirement and also allow a housing at H3.7 Britford P&R – to meet South Wiltshire HMA's housing needs.

SEE ATTACHED FULL REPORT INCLUDING APPENDIX 1 & 2

Attached files (Please see Objective)	4717209
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To explain to the Inspector the merits of this objection and to examine in public the Authority's case, as presented to the Examination (assuming the Authority do not accept our objections and modify the WHSAP).

Comment ID:	1605	Consultee The Reversioners Trust Person ID: 1129497	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy H2: the draft Plan makes no provision in terms of allocations for custom / self-build housing despite demand in Wiltshire. The draft Plan is therefore in conflict with national planning policy and legislation in this regard.</p> <p>National planning policy and legislative context: Paragraph 50 of the NPPF (2012) states that LPAs should: "...plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)";</p> <p>(Bold our emphasis)</p> <p>The Self-Build and Custom Housebuilding Regulations 2016 (2016 Regulations) came into force on 31st October 2016. The 2015 Self-Build and Custom Housebuilding Act states that LPAs are obligated to keep a register of individuals and associations of individuals who are seeking to acquire serviced plots of land in an LPA's administrative area in order to build houses for those individuals to occupy as homes.</p> <p>National Planning Practice Guidance was updated on 28 July 2017. In response to the question "How can relevant authorities increase the number of planning permissions which are suitable for self-build and custom-build housing?" (NPPG: Paragraph: 024 Reference ID: 57-024-201760728) states:</p> <p>"Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include: developing policies in their Local Plan for self-build and custom housebuilding; using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register; engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and working with custom build developers to maximise opportunities for self-build and custom housebuilding"</p> <p>(Bold our emphasis)</p> <p>Demand for custom /self-build in Wiltshire: the statutory Wiltshire Register currently indicates a demand for self-build plots from 218 No. individuals and one group of 4 No. households. However, actual demand for self-build / custom-build housing is likely to be much higher as local community awareness of the statutory register is very low.</p> <p>For example, evidence used to support a recent appeal process at Boreham Mead, Warminster obtained from Buildstore (who own Plot-search and the Custom-Build Register), confirmed that in 2014 there were:</p> <p>within 15 miles of BA12 postcode (Warminster): 638 Plot-search subscribers and 77 custom build register subscribers.</p> <p>within 20 miles of BA12 postcode (Warminster): 1319 Plot-search subscribers and 150 custom build register subscribers</p> <p>Supply of custom/self-build housing in Wiltshire: apart from subdivision of individual gardens for plots, there has been no larger scale provision of custom/self-build housing plots in Wiltshire.</p> <p>The only planning commitment that we are aware of is an extant outline planning permission at Boreham Mead, Warminster, which was approved by the Secretary of State in July 2017 (LPA Ref: 13/06782/OUT, PINS Ref: 3150774). The Boreham Mead site will be marketed by the</p>		

	<p>landowner to prospective custom-builders later this year. It is therefore concluded that demand (based on the statutory register) exceeds supply, and that on this basis, it is submitted that the Council should be making provision for self/custom-build allocations in the draft Plan in accordance with legislation and national planning policy and guidance.</p> <p>Promotion of Land at Old Road, Derry Hill: The Reversioners Trust wish to work with the Council and local community to promote Land at Old Road, Derry Hill explicitly for a hybrid scheme of self/custom-build and associated infrastructure and a comprehensive landscaping scheme. The subject site extends to 4.9ha as annotated on the enclosed Site Location Plan. The site is not subject to any national or local landscape or ecological designations, and is classified as Grade 3 agricultural land. The site has fully defensible boundaries on all sides: New Road (A4) to the north; existing dwellings to the east and west; and Old Road to the south.</p> <p>A preliminary transport feasibility study has been undertaken by Entran which indicates that vehicular access can be taken from south boundary in the form a simple priority junction from Old Road along with road widening on part of the southern side of Old Road, which is also in The Reversioners Trust's ownership.</p> <p>The Reversioners Trust has initiated work on building up a technical evidence base for the subject site so that the constraints and opportunities can be identified. Preliminary discussions with prospective custom-build developers have also commenced.</p> <p>The intention is to develop a comprehensive masterplan for a hybrid scheme of self / custom-build. The custom-build units would be located on the site frontage to create an appropriately 'designed' site frontage to Old Road comprising the custom-build plots as a set piece design, with serviced self-build plots and public open space within the site. A design code with parameters would be developed to control building heights (eaves and ridge parameters) and a pallet of suitable quality building materials.</p> <p>Statement of Common Ground: The Reversioners Trust is willing to work collaboratively with Wiltshire Council to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan, in the event that the Council decide to include the subject site as an allocation.</p> <p>Policy H2: in order to comply with national planning policy and legislation relating to the provision of custom/self-build to meeting demonstrable local demand, it is submitted that the Council should allocate Land at Old Road, Derry Hill as a custom / self-build site.</p>
Attached files (Please see Objective)	4716907
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To make the planning case for the subject 'omission' site to be included as a Self / Custom Build allocation in the draft Plan.

Comment ID:	1606	Consultee Fosse 1 Person ID: 1129527	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2: the principle of allocating land for housing at Hullavington is supported. However, we submit that Land to the rear of Newtown (SHLAA Ref: Site 1112) should be allocated in addition to Land at The Street under Policy H2.11 (SHLAA Ref: 690) as a single comprehensive allocation. The basis of our submission is that Site 1112 has been incorrectly assessed in the Council's Sustainability Appraisal; and that there are clear planning benefits to the local community, which lead to a compelling planning case for both sites (1112 and 690) to be allocated. We further note that additional demand for residential properties in this local area is likely to arise from new employment opportunities that will be created at the Hullavington airfield site following its recent acquisition by the Dyson group. Site 1112 promotion context: Fosse 1 hold a 'subject to planning option' of Site 1112, which extends to circa 0.95ha, as outlined on the enclosed Site Location Plan (Ref: 16-004-200).</p> <p>Fosse 1 have assembled a professional team and have procured a technical evidence base of the site. This includes topographical; drainage; landscape; heritage; agricultural land classification; ecology; and transport information. The baseline evidence demonstrates that the subject site has capacity to accommodate a low-density / high quality mixed-tenure scheme of circa 25 dwellings, and associated infrastructure. Positive informal feedback has also been received from the Parish Council in respect of the proposed development of the subject site. Comments on Chippenham Community Area Sustainability Appraisal: the suggested SHLAA site capacity of 24 No. units in Table 5.7 of the Sustainable Appraisal accords with Fosse 1's assessment of the site and is considered to be achievable in technical terms whilst delivering an appropriate landscaped-led design.</p> <p>The comments in Table 6.8 in respect of Site 1112 assessment (Stage 4a) are not considered to be well founded on the following grounds:</p> <p>Ground A - Sustainability benefits: the assessment questions the sustainability benefits on the basis of site size and capacity. The inclusion of the subject site as an 'additional' housing allocation will deliver the following sustainability benefits:</p> <p>(i) it will enable the delivery of the preferred option site at The Street as part of a comprehensive approach. The enclosed photosheet illustrates a significant existing traffic congestion problem along Newtown, which is which is obstructed by parked cars. At times prevents the passage of emergency vehicles, refuse and other commercial vehicles whilst also posing a highway safety issue to other road users and pedestrians (refer to Photos 1-6 on the attached photosheet). This situation will only be exacerbated by the development of proposed allocation at The Street on a standalone basis. Many of the houses along Newtown do have any off-street parking provision. Fosse 1 have agreed to make provision in their masterplan for dedicated off-street parking provision for the existing dwellings at Newtown, which front onto the southern boundary of the subject site. These parking spaces can be integrated into the design of the internal access road and would reduce on-street parking along Newtown. This in turn would enhance highway safety, and would assist in enabling the delivery of proposed allocation at the Street.</p> <p>(ii) a combined development approach of The Street and the subject site, which share a common landownership boundary, will enable the provision of shared services, pedestrian links, and also the creation of circular walks and routes avoiding Newtown.</p> <p>Ground B - setting and landscape impact: the heritage setting and landscape impact are addressed below:</p>			

	<p>(i) Fosse I instructed Michael Heaton Heritage Consultants to consider the significance and setting of the grade II listed Baptist Chapel as well as the archaeological potential of the site (Refer to enclosed Heritage Statement Ref: 3760). The report concludes that residential development of the subject site would not adversely affect the setting or the significance of the Baptist Chapel, and that the 'visual background, foreground and historical context of the chapel would remain unaltered and the average person's perception of the chapel would remain unaltered'.</p> <p>(ii) The subject site is not subject to any national or local landscape or ecological designations. The enclosed Agricultural Land Classification report confirms that the site has an agricultural land classification of grade 3a to 4, as confirmed in the enclosed Soil Classification report and associated Agricultural Land Classification Plan (Ref: Bateman Rural Associated Ltd) Therefore, development would not result in the loss of best and most versatile agricultural land</p> <p>(iii) The site is relatively level, and is bounded by defensible boundaries on all sides including hedgerows on the north and north-western edges. The development of the subject site would represent a logical rounding off against existing the existing natural topography and also in spatial character terms. Additionally, the edge condition of the site could be strengthened by new tree and hedge planting, which could provide additional visual screening mitigation from public views outside the site.</p> <p>Statement of Common Ground: the site promoters, Fosse I, are willing to work collaboratively with Wiltshire Council (and the promoters of Site 690) to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: in order to deliver a comprehensive solution for Hullavington, it is submitted that the Council should allocate SHLAA sites 690 and 1112 as a single comprehensive allocation.</p>
<p>Attached files (Please see Objective)</p>	<p>4716938 / 4716939 / 4716940 / 4716941 / 4716942 /</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.</p>

Comment ID:	1607	Consultee Bob and Linda Perry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129532		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are concerned in regard the proposed extension of the above development (beyond 10 already being built) and we would like this to be reconsidered please.</p> <p>We have the following concerns: Flooding. As victims of flooding to our home we want to ensure that surface water systems may not cope with additional housing and may affect other houses within our village</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1608	Consultee Bob and Linda Perry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129532		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are concerned in regard the proposed extension of the above development (beyond 10 already being built) and we would like this to be reconsidered please.</p> <p>We have the following concerns:</p> <p>We support the development of our own plan and a chance for our own Neighbourhood Plan</p> <p>We want the above process to be given a chance</p> <p>This seems an unnecessary development and there is no need for this strategic development here</p> <p>So we believe that the Neighbourhood plan should determine the scale and location of housing needed . We see the need for more housing but want it to be carefully planned . So please do not proceed any further at this time.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1609	Consultee Braeman Holdings Person ID: 556645	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2: we consider that the draft Plan should be making provision for additional growth in Melksham on the following basis: The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026. There are significant technical and political delivery issues associated with allocated Core Strategy strategic sites, and proposed allocation sites in the Draft Plan, particularly around the Trowbridge Area. This may necessitate a search for alternative sites in settlements in the next tier in the settlement hierarchy, such as Melksham. There is an acute unmet affordable housing need in Melksham, which can only be addressed by the provision of new housing to subsidise the provision of new affordable housing. It is submitted that in order to ensure a deliverable 5-year housing land supply and meet the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in Melksham, that the subject site should be included as a mixed-use allocation for circa 75 homes and new employment space (Class B1) in the draft Plan. Promotion history: Braeman Holdings own the freehold interest of the subject site. The site is currently allocated as a Principal Employment Area under Policy CP35 of the adopted Core Strategy (2015). Long term marketing of the site by local agents Carter Jonas has confirmed that there is no employment interest in this site. Furthermore, the site's narrow frontage, and topographical constraints, preclude larger scale employment uses that rely on a roadside presence and/or HGV access/egress. On this basis, having regard to the advice in Paragraph 22 of the NPPF (below) it is considered that there is a compelling case to allocate this site for mixed-use housing and employment development comprising: circa 75 units of housing; with the balance of the site as flexible Class B1 employment units, which could be provided to the market on a speculative basis through cross-subsidy from the housing. 22. Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. Design development: Braeman Holdings have undertaken extensive flood risk modelling to determine the extent of the potential developable area. A draft masterplan is presently being evolved and will be subject to a process of pre-application engagement later in 2017. It is anticipated that the whole mixed-use development will be potentially deliverable by April 2020. The enclosed Ownership and Residential Boundary Plan shows the extent of residential development coverage in green (Ref: 2484-100A). Statement of Common Ground: Braeman Holdings confirm their willingness to work collaboratively with Wiltshire Council to promote this site. If the Council is minded to allocate the site, we can confirm that Braeman Holdings would be willing to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan. Policy H2: to allocate land at Upside Park for a mixed-use development of employment and housing.</p>			

Attached files (Please see Objective)	4716971
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.

Comment ID:	1610	Consultee Bob and Linda Perry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129532		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are concerned in regard the proposed extension of the above development (beyond 10 already being built) and we would like this to be reconsidered please.</p> <p>We have the following concerns:</p> <p>The increase in dwellings , at quite a percentage of existing housing, would put a strain of infrastructure, school, roads, traffic etc</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1611	Consultee Mr Alec Carruthers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129546	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Our family has been in residence in Bratton for 39 years, the reason for purchasing was to live in a country village in a green belt area with access to Westbury where I worked as an Engineer and Manager with ALH Systems Ltd.</p> <p>Housing development in a small field opposite our home has already been considered and refused a number of times over the years. The land, which is farming by nature somehow now becomes ideal for building homes, one wonders if the current cost ratio of farming versus building land has something to do with this.</p> <p>When people wish to live in the country and are prepared to pay arguably the largest sum of money ever spent on a country home, they do not expect to have both value and aspect devalued by a development of green-belt land which should have incurred some degree of security. One wonders what the legal position is when rules can be broken so easily by Local Authorities.</p> <p>To squeeze forty homes into such a small acreage and provide the necessary roads, pathways and services, as well as access to a main road which gets busier daily, and to spoil entry to a village, suggests some reasons why previous attempts to exploit this piece of farmland have failed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1612	Consultee Mr Alec Carruthers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129546	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This small plot of land with a right of way path running down the right hand side is no more than a few acres on which forty homes are proposed. The main road through Bratton is the b3098 and passes in front of my property, this road now carries three to four times the traffic as when we arrived. Between our property and the said field the road narrows to almost single lane, road signs have little or no effect on what is a 30 mile limit. This limit is ignored by a large percentage of traffic both entering and leaving the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1613	Consultee Anton Campbell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129609	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field,Yatton Keynell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have had a letter asking me to object to planning of 30 new houses at the back of Faller Fields in Yatton Keynell.</p> <p>This e-mail is to say that I couldn't disagree more with the letter and think this development is great for the village.</p> <p>As it stands the village is unaffordable for young people or families on limited income and will become a retirement village like others in the area. The school is undersubscribed at the moment and would benefit greatly by having more people in its catchment. Also I assume most people that will object will be in houses that are barley 15 years old themselves.</p> <p>The letter alludes to poor consultation but if parish councils at not willing to engage proactively with planning requests and just dismiss them out of hand then I don't see this justified.</p> <p>The location wont have a visual impact as the location is behind existing houses and will have open spaces around it.</p> <p>Over all I think the application is exactly what is needed to keep the village viable and thriving and not lose business and go dormant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1614	Consultee Debbie Credicott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129610		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am very concerned about the proposed allocation of an additional 40 dwellings on the Ridgeway Farm Site in addition to the 10 that are currently being built.</p> <p>I objected back in 2014 when plans were submitted for 29 houses but I, like many, were happy with the revised plans for 10 because it was in proportion with the developments that have occurred over the last 20 or so years at Gooselands and in Ridgeway, Tuners Lane. There has been many other smaller developments of 2 - 4 houses which, again, are proportionate and have enabled the village to grow and thrive in a way that has not put undue pressure on the drainage and sewerage systems, the infrastructure and the school.</p> <p>Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy.</p> <p>As a Neighbourhood Plan is currently being worked on by a Group in the village, I firmly believe the community should be consulted and allowed to formulate a development plan that not only meets identified housing needs over the next 10 - 15 years but also takes into consideration the legitimate concerns of residents. As a community we will insure that it addresses the infrastructure constraints such as road, drainage and sewerage capacity, addresses the impact on the school and comes forward with a well thought out plan of how the village should develop over the coming years, the services it might need to meet those additional demands and look holistically at how it might look in 20 years time whilst maintaining the essential characteristics of a village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1615	Consultee Debbie Credicott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129610		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am very concerned about the proposed allocation of an additional 40 dwellings on the Ridgeway Farm Site in addition to the 10 that are currently being built.</p> <p>When I objected to the 29 houses it was because of the impacts on the school which was nearly at capacity in 2014 and certainly is now. We already have children travelling in from the Malmesbury and Tetbury areas and I am aware of a few cases where residents in Crudwell are having to travel outside the village for their to go to school. This does not make any sense.</p> <p>As a Neighbourhood Plan is currently being worked on by a Group in the village, I firmly believe the community should be consulted and allowed to formulate a development plan that not only meets identified housing needs over the next 10 - 15 years but also takes into consideration the legitimate concerns of residents. As a community we will insure that it addresses the impact on the school and comes forward with a well thought out plan of how the village should develop over the coming years, the services it might need to meet those additional demands and look holistically at how it might look in 20 years time whilst maintaining the essential characteristics of a village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1616	Consultee Debbie Credicott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129610		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am very concerned about the proposed allocation of an additional 40 dwellings on the Ridgeway Farm Site in addition to the 10 that are currently being built.</p> <p>When I objected to the 29 houses it was because of the impact of traffic on Tetbury Lane which is narrow and already very busy.</p> <p>As a resident of the Butts who has had to deal with speeding drivers coming down Tetbury Lane when walking the dog and faces a daily battle getting out of the Butts due to a high volume of traffic at the peak times, I think this allocation is ill conceived; a 20% increase in the number of houses in the village completely disproportionate and unwarranted.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1617	Consultee Debbie Credicott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129610		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am very concerned about the proposed allocation of an additional 40 dwellings on the Ridgeway Farm Site in addition to the 10 that are currently being built.</p> <p>When I objected to the 29 houses it was because of the impacts on the drainage and sewerage systems.</p> <p>As a Neighbourhood Plan is currently being worked on by a Group in the village, I firmly believe the community should be consulted and allowed to formulate a development plan that not only meets identified housing needs over the next 10 - 15 years but also takes into consideration the legitimate concerns of residents. As a community we will insure that it addresses the infrastructure constraints such as drainage and sewerage capacity.</p> <p>As a resident of the Butts who has had to deal with flooding and sewerage issues on more than one occasion, I think this allocation is ill conceived; a 20% increase in the number of houses in the village completely disproportionate and unwarranted.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1618	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No. The statement - Principal Settlements of Salisbury and Trowbridge. 1. Trowbridge lacks serious infrastructure and transport links to be considered a principal town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1619	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	No The statement - Principal Settlements of Salisbury and Trowbridge. 2. Local services, Health & education are currently stretched to capacity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1620	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	No The statement - Principal Settlements of Salisbury and Trowbridge. Poor local employment opportunities in the area, force the working population to commute daily.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1621	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	No The statement - Principal Settlements of Salisbury and Trowbridge. The existing road systems are currently choked to capacity, with major noise & pollution hot spots.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1622	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>The statement - Principal Settlements of Salisbury and Trowbridge.</p> <p>The council must reconsider planning & presenting a coherent overall infrastructure package, maintaining the very homeland character of the area which is a Country Market town surrounded, by individual outlying villages and countryside.</p> <p>The DPD in its current form threatens to further degrade the existing quality of life for the local population. Suggest DPD needs to consider spreading future development, thinly over wider Wiltshire area, wherever possible small developments in many villages will be more easily accepted & absorbed into the community. Big Town developments seem to be the easy option in respect of numbers but present big problems.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1623	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		No Lack of serious infrastructure and transport links.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure proper procedures are adhered to.			

Comment ID:	1624	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		No Local services, Health & education are currently stretched to capacity.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure proper procedures are adhered to.			

Comment ID:	1625	Consultee Mr Michael Linham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1129612		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No Poor local employment opportunities in the area, force the working population to commute daily.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1626	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No The existing road systems are currently choked to capacity, with major noise & pollution hot spots.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1627	Consultee Mr Michael Linham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>The council must reconsider planning & presenting a coherent overall infrastructure package, maintaining the very homeland character of the area which is a Country Market town surrounded, by individual outlying villages and countryside. There is no overall vision of an improved future. The DPD in its current form threatens to further degrade the existing quality of life for the local population. Suggest DPD needs to consider spreading future development, thinly over wider Wiltshire area, wherever possible small developments in many villages will be more easily accepted & absorbed into the community.</p> <p>Big Town developments seem to be the easy option in respect of numbers but present big problems. Suggest the council should consider blocking all further green field town development until existing, Brown field sites are developed to breath new life back into the town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1628	Consultee Mr Michael Linham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>I question the methodology used in the DPD.</p> <p>The number of allocations to the Trowbridge area are proportionally ! higher ! Than in any other area in Wiltshire (includeing Chippenham & Corsham together),</p> <p>The area has already suffered large housing development, with yet more local areas identified and approved for further mass houseing development. None of your plans show this clearly ! How can Wiltshire council justify this continued onslaught on this area. I find it difficult to find evidence of any carefully joined up plan (future vision) from Wiltshire council DPD.</p> <p>The council should reconsider planning & presenting a coherent overall infrastructure package, maintaining the very homeland character of the area which is a Country Market town surrounded, by individual outlying villages and countryside. The DPD in its current form threatens to further degrade the existing quality of life for the local population.</p> <p>Suggest DPD needs to consider spreading future development, thinly over wider Wiltshire area, wherever possible small developments in many villages will be more easily accepted & absorbed into the community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1629	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>This proposal will affect the distinct character & natural boundary between Town & village. I urge the council to reconsider overall planning & present a coherent overall infrastructure vision.</p> <p>Maintaining the very homeland character of the area, which is a Country Market town surrounded, by individual outlying villages and countryside should be crucial.</p> <p>Existing road systems are currently choked to capacity at peak times, with major noise & pollution spots.</p> <p>Does good planning include adding to an existing problem, without addressing the issue?</p> <p>This clearly contradicts sustainability objectives 4 & 6 on Page 923.</p> <p>The DPD in it's current form threatens to further degrade the existing quality of life for the local population. Again in the past & present Trowbridge seems to be a focal point for big Town development seemingly being the easy option in respect of large numbers .</p> <p>Suggest DPD needs to consider spreading future development, thinly over wider Wiltshire area, wherever possible small developments in many villages will be more easily accepted & absorbed into the community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1630	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>This proposal will affect the distinct character & natural boundary between Town & village.</p> <p>I urge the council to reconsider overall planning & present a coherent overall infrastructure vision.</p> <p>Maintaining the very homeland character of the area, which is a Country Market town surrounded, by individual outlying villages and countryside should be crucial.</p> <p>Existing road systems are currently choked to capacity at peak times, with major noise & pollution spots.</p> <p>Does good planning include adding to an existing problem, without addressing the issue?</p> <p>This clearly contradicts sustainability objectives 4 & 6 on Page 923.</p> <p>The DPD in it's current form threatens to further degrade the existing quality of life for the local population.</p> <p>Again in the past & present Trowbridge seems to be a focal point for big Town development seemingly being the easy option in respect of large numbers . Suggest DPD needs to consider spreading future development, thinly over wider Wiltshire area, wherever possible small developments in many villages will be more easily accepted & absorbed into the community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1631	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>This proposal will affect the distinct character & natural boundary between Town & village.</p> <p>I urge the council to reconsider overall planning & present a coherent overall infrastructure vision.</p> <p>Maintaining the very homeland character of the area, which is a Country Market town surrounded, by individual outlying villages and countryside should be crucial.</p> <p>Existing road systems are currently choked to capacity at peak times, with major noise & pollution spots.</p> <p>Does good planning include adding to an existing problem, without addressing the issue?</p> <p>This clearly contradicts sustainability objectives 4 & 6 on Page 923.</p> <p>The DPD in it's current form threatens to further degrade the existing quality of life for the local population.</p> <p>Again in the past & present Trowbridge seems to be a focal point for big Town development seemingly being the easy option in respect of large numbers . Suggest DPD needs to consider spreading future development, thinly over wider Wiltshire area, wherever possible small developments in many villages will be more easily accepted & absorbed into the community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1632	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>This proposal will affect the distinct character & natural boundary between Town & village.</p> <p>I urge the council to reconsider overall planning & present a coherent overall infrastructure vision.</p> <p>Maintaining the very homeland character of the area, which is a Country Market town surrounded, by individual outlying villages and countryside should be crucial.</p> <p>Existing road systems are currently choked to capacity at peak times, with major noise & pollution spots.</p> <p>Does good planning include adding to an existing problem, without addressing the issue?</p> <p>This clearly contradicts sustainability objectives 4 & 6 on Page 923.</p> <p>The DPD in it's current form threatens to further degrade the existing quality of life for the local population.</p> <p>Again in the past & present Trowbridge seems to be a focal point for big Town development seemingly being the easy option in respect of large numbers . Suggest DPD needs to consider spreading future development, thinly over wider Wiltshire area, wherever possible small developments in many villages will be more easily accepted & absorbed into the community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1633	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>This proposal will affect the distinct character & natural boundary between Town & village.</p> <p>I urge the council to reconsider overall planning & present a coherent overall infrastructure vision.</p> <p>Maintaining the very homeland character of the area, which is a Country Market town surrounded, by individual outlying villages and countryside should be crucial.</p> <p>Existing road systems are currently choked to capacity at peak times, with major noise & pollution spots.</p> <p>Does good planning include adding to an existing problem, without addressing the issue?</p> <p>This clearly contradicts sustainability objectives 4 & 6 on Page 923.</p> <p>The DPD in it's current form threatens to further degrade the existing quality of life for the local population.</p> <p>Again in the past & present Trowbridge seems to be a focal point for big Town development seemingly being the easy option in respect of large numbers . Suggest DPD needs to consider spreading future development, thinly over wider Wiltshire area, wherever possible small developments in many villages will be more easily accepted & absorbed into the community.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1634	Consultee Mr Michael Linham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129612	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge housing sites section			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No</p> <p>I do not feel assured that Wiltshire council has properly considered or planned for the full implications & effect of all the proposed & approved developments in the West Wiltshire area around the Avon river basin.</p> <p>Every large scale development will generate huge volumes of run off water into the Avon.</p> <p>Historically all areas alongside the river Avon suffer major flooding effects at wet times. Many major roads in this area close, travel becomes impossible, many properties are at risk of flooding.</p> <p>House insurance premiums against flooding will rise in threatened areas.</p> <p>With so many large scale developments being planned in and up stream of Bradford on Avon - Staverton Trowbridge - Holt - Melksham - Chippenham & beyond.</p> <p>The assurances i have seen about water run off controls into the river Avon basin simply do not add up. Maybe this water resource with some imaginative planning, may become a powerful energy asset for the county in the future ?</p> <p>Early intervention measures may now be required before a planning opportunity is missed, And future generations live with the miserable consequences.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure proper procedures are adhered to.				

Comment ID:	1635	Consultee Mr Richard Greenwood	Agent Richard Greenwood Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1119095	Benchmark Development Planning Ltd Person ID: 894742	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Objection 3 to: Draft DPD including proposed housing numbers within the Amesbury Community Area and South Wiltshire Housing Market Area, including all the supporting Topic Papers where they deal with, inter alia, the 5-year housing land supply, Central Car Park (Salisbury), Churchfields, H3.1, H3.3 and H3.4.</p> <p>In this statement, we are promoting further housing development at H3.5 plus all of S98 Clover Lane / Hackthorne and H3.6 Larkhill Rd, Durrington</p> <ol style="list-style-type: none"> Our main objection is to the Authority's failure to allocate all S98 at Hackthorne (Durrington) for housing. (Our Objection 4 supports further housing development at H3.6: Larkhill Rd, Durrington.) In our opinion, insufficient land is proposed to be allocated to meet the minimum housing requirement set out in the adopted Wiltshire Core Strategy (2015). Despite the resilience testing of the Draft DPD – set out in the Topic Paper 4: 'Developing Plan Proposals' - we are not convinced by those judgements and consider that insufficient land is being proposed for housing development. As a result, there is a strong likelihood of an unnecessary shortfall in supply to the rolling 5 Year Land Supply. Furthermore, we are close to a possible change to the way housing figures are assessed. We understand (early September 2017) the Government will publish a consultation document setting out details for a standard method for assessing housing need. This has been delayed and is now expected by the end of September 2017. We therefore reserve comment and may add further to this objection, in the light of the anticipated new advice. We now set out the main points of our case that we are likely to expand upon at the Examination. First, we need to set the scene. Core Policy 2 of the WCS requires the County to accommodate at least 42,000 additional dwellings over the period 2006 to 2026. This places a minimum requirement on the South Wiltshire Housing Area for 10,420 dwellings, divided potentially, but not in a fixed way, roughly as follows: <p>Summary of DPD Table at paragraph 2.17 [see table in attachment]</p> <ol style="list-style-type: none"> We need to now briefly explain about Durrington's position in South Wiltshire and its importance and capacity to receive some further housing. Durrington falls into the southern housing market area within the Amesbury Community Area where 27% of the minimum requirement is currently to be 'sent' $[(2,785/10,420) \times 100]$. We consider that this proportion should be increased to relieve pressure on the Salisbury CA up to 30% - representing a minimum housing requirement for the Amesbury Community area of about 3,125 dwellings. We say this because Durrington, along with Bulford and the associated military garrisons, forms part of a group of settlements with Amesbury which have close links to one another, both geographically and functionally, and collectively make up a large population, almost 50% that of Salisbury. 				

9. Durrington (c 5,000 people) is a town with pubs, several shops including small supermarkets operated by Sainsbury's and Tesco and schools at all levels. It has a good and modern swimming and fitness centre. Apart from the older part of the settlement around the Church (within the Conservation Area) – it's not like a traditional south Wiltshire town or large village – there is capacity for more structured growth to help underpin the town (and cluster) for about 200 dwellings.

10. Amesbury Community Area: Over the last 15 years there has been significant balanced growth in and around Amesbury with major employment and economic development opportunities at Solstice Park the 64 ha Business Park fronting the A303. Porton Down is now an international centre of excellence for biological research and health protection. Boscombe Down is a major research and development establishment and the army super garrisons all add to the importance of this area. Taken as a whole, it is significant self-sufficient sustainable cluster.

11. Of course, most of South Wiltshire is heavily constrained by significant international, national and local planning designations. Near but not including Durrington there are two Natura 2000 sites: the River Avon and Salisbury Plain Special Areas of Conservation and of course nearby – but not including Durrington - Stonehenge World Heritage site attracts visitors from all over the world and directly and indirectly employs people from the locality.

12. Our point is this: sustainable well-planned and delivered development is quite possible within this community area and more specifically at S98, Durrington - without causing actual or feared significant environmental harm before 2026. Indeed, the partial allocation of S98 within H3.5 indicates just how suitable ('ripe') this land is, as already accepted by the Council.

13. We particularly note paragraph 5.21 of the WCS describes the Amesbury Community Area to be thriving and a place where people want to stay that is attractive to new residents, businesses and visitors alike.

14. And yet we do not consider this draft DPD accords (i.e. it is not sound) with the WCS in this respect or is sound. Certainly, the Draft DPD does not accord with paragraph 47 of the NPPF that sets out the Government's intention to "boost significantly the supply of housing". In our opinion, this Planning Authority should not seek to provide the minimum requirement (indeed we note in passing that the word 'minimum' is dropped all too easily from key parts of the draft DPD). Wiltshire Council should instead meet the full objectively assessed housing need by:

Providing five years' worth of housing with an additional buffer of 20% by including all of S98 at Durrington;

And / or identifying land at S98 Durrington to assist with the supply of specific, developable sites or broad locations for growth, for year 6–10, and where possible, for years 11–15. (Alarmingly, the Council has no published housing plans for post-2026 – just 8 years or so away);

Providing a housing trajectory for the plan period to describe how the authority will maintain delivery of a five year + 20% to the end of the plan period: currently the Draft DPD fails – see table below:

Summary of Table at para 4.32 of 5 Year Housing Land Supply
[see table in attachment]

15 Paragraph 55 of the NPPF also, amongst several criteria, promotes the optimisation of the potential of sites to accommodate development (i.e. higher densities).

16. We would like to draw the Inspector's attention to two matters – 'deliverability' and 'developability': we are not convinced the Authority has assessed fairly or soundly their potential housing land that they consider will be developed before 2026 at:

Central Car, Salisbury (CP 2 and CP 21 of WCS for 200 dwgs) – Benchmark's opinion: This site is neither deliverable or developable as matters stand in September 2017. This site is too complicated and unrealistic and mired in viability and delivery/developability problems. There is no realistic prospect this site will be redeveloped before 2026 (just c. 8 years away).

Churchfields, Salisbury (CP 2 of WCS for 1,100 dwgs) – Benchmark's opinion: neither deliverable or developable as matters stand in September 2017. Likewise, and even more so than Central Car Park: too complex and unrealistic and not viable. It is a laudable goal but incredibly difficult to achieve without major intervention. And this should be done now. (Compulsory Purchase Orders, if started today, (none are known to be in the 'offing') might yield vacant possession, in 15 years' time, procedable over another 10 years, for the first 100 houses to be built in 2040 – at the earliest (if it ever happens).)

	<p>Netherhampton Rd, Salisbury (H3.1 and H3.4 of draft DPD for 740 dwgs) – Benchmark’s opinion: neither deliverable or developable as matters stand in September 2017. Too controversial with sensitive issues regarding traffic, ecology and heritage – and public opinion. Not deliverable before 2026 – perhaps after 2035.</p> <p>Rowbarrow, Salisbury (H3.4 100 dwgs H3.) – Benchmark’s opinion: neither deliverable or developable as matters stand in September 2017. Too controversial with sensitive issues regarding traffic, ecology and heritage (setting of the Cathedral) – and public opinion. Bad site – unsuitable – it should be dropped.</p> <p>17. We do not consider the Authority’s application of Footnotes 11 and 12 of NPPF that define the deliverability and developability of these 4 arguably key potential sites, has been sound enough. This is what should have been assessed.</p> <p>The Footnotes state: “(11) to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular the development of the site is viable... (12) to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”</p> <p>18. Even taking into account the Council’s resilience testing in Topic Paper 4: ‘Developing Plan Proposals’ – there could easily be a shortfall of 200 + 1,100 + 740 + 100 dwgs = 2,040 dwellings.</p> <p>19. The impact of the loss of about 2,000 dwellings (about 20%) out of the Authority’s ability to provide a 5-year rolling supply of housing land could be severe: developers would be able to try to promote sites already excluded via the SHLAA process in the light of paragraph 49 of the NPPF: “Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.”</p> <p>20. To begin to build more stability into the housing figures, in the context of our other objections, we are suggesting the Council do more than aim to meet the minimum requirement and also allow a little more housing from Amesbury CA to provide a fairer share – a proportionate share – to meet South Wiltshire HMA’s housing needs. The Table at paragraph 4.28 of the Draft DPD is therefore proposed to be amended as follows (red): [see table in attachment] By allocating further land the WHSAP will be more likely to meet the 5 Years Housing Supply for the Amesbury Community Area to the end of the period (2026) and housing need generally in this area during the Plan period.</p> <p>To deliver this much needed housing there need to be several corrections to the draft Housing and Settlement Boundary DPD.</p>
Attached files (Please see Objective)	4717277
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To explain to the Inspector the merits of this objection and to examine in public the Authority's case, as presented to the Examination (assuming the Authority do not accept our objections and modify the WHSAP).

Comment ID:	1636	Consultee Virginia Hilton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129633	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re Ridgeway Farm Development Crudwell North Wiltshire I write to oppose any further development to this site.</p> <p>Reasons: DRAINAGE The existing sewage and storm drainage systems can not cope with the current burdens and have been overwhelmed several times in recent years. This Site is an agricultural field and part of a working farm. It must therefore be considered as a Green Field Site and in Open Countryside. It should not, therefore, be considered ahead of all the other Brown Field Sites and in-fill opportunities in the area. In this regard, I would submit that both Hullavington and Kemble airfields which have unused buildings and large areas of existing concrete would be more suitable for additional housing.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1637	Consultee Virginia Hilton Person ID: 1129633	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Re Ridgeway Farm Development Crudwell North Wiltshire I write to oppose any further development to this site. Reasons: SIZE & AMENITIES Crudwell has been designated a Large Village within the Malmesbury district, which is not justified and should not be allowed to stand. Crudwell's population in the 2011 census was 1057 whereas Minety's population in the 2011 census was 1414 and is designated a Small Village. There is no evidence to suggest this ratio has changed since 2011. I would therefore submit that Minety would be an more appropriate village for additional housing and that Crudwell be reclassified as a Small Village unsuitable for the additional housing being proposed. Crudwell has no village shop whereas the villages of Sherston and Oaksey do.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1638	Consultee Virginia Hilton Person ID: 1129633	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Re Ridgeway Farm Development Crudwell North Wiltshire I write to oppose any further development to this site. Reasons: TRANSPORT 1. This Site is not served by any public transport. The nearest, extremely infrequent, bus service is from the end of Tetbury Lane on the A429 and there is no footpath or pavement from this site. Tetbury Lane is narrow and insufficiently wide both to the West and East of this Site to enable vehicles travelling in opposite directions to safely pass. This means that pedestrians such as children coming and going from pre School at the Village Hall just west of the Site/Crudwell School and catching school buses to/from secondary school would be placed at great risk. This problem is made worse due to the inadequate very poor street lighting. 2. The nearest shopping town to the Site is Tetbury and the nearest supermarket is also in Tetbury. This means that the increased traffic using Tetbury Lane to the west of the Site will inevitably increase. In terms of both width and structure this Lane is unable to cope with the existing demand being put upon it and is wholly unsuitable for any increased usage. 3. This Site has already been approved for 10 houses currently under construction. This in itself will significantly exacerbate the problems in 1. & 2. above - the full impact of which is yet to become apparent. 4. The Rommel Lane intersection immediately to the west of the Site is a blind spot junction with no street lighting. Any increase of traffic would make this extremely dangerous junction even more challenging.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1639	Consultee Stuart Eels	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129642	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Allocation of housing site adjacent to Farrels Field Yatton Keynell</p> <p>I was surprised to say the least to find this 'guidence' letter showing residents of Yatton Keynell how to object to possible housing of 30 houses adjacent to Farrells Field. The residents of Farrells Field may be upset about the location of housing but do they really have a valid reason to object? given that when built Farrells Field was also outside the boundaries of the village?</p> <p>I honestly believe you should only object to new housing if the housing overlooks your property, interferes with your right to light or intrudes upon your property. Housing is vital in these rural areas as is shown by the All- Party Parliamentary Group for Housing and for care of the elderly. Lord Richard Best Vice Chair of APPG making the case for more rural housing to cope with the nation's villages getting more elderly after research by the Local Government Association.</p> <p>The only reason that the Parish of Yatton Keynell is a thriving Parish is that housing was allowed in the 1970s through to the development of Farrells Field, Yatton Keynell unlike others in this area, still retains employment, a fine Post Office/Shop, a Doctor's Suregery, a School and a very popular Public House. We should aim to keep it that way, I have lived in this area all my life bar five years and remember villages like Castle Combe, Grittleton, Burton and Nettleton being the same size as Yatton Keynell and through the actions Nimbys are now almost ghost villages, I have been told by a Castle Combe Parish Councillor that 75% of the houses in Lower Castle Combe are now holiday homes. We must strive to encourage people to come to Yatton Keynell and keep it thriving village. I would like to give this allocation of housing my whole hearted support.</p>				
Attached files (Please see Objective)	4717563				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1640	Consultee Sue Bond Clerk Seend Parish Council Person ID: 1129662	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.40				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Seend Parish Council's response to Wiltshire Council's Draft Housing Site Allocations Plan in relation to the proposed changes to Seend parish's Settlement Boundaries</p> <p>Introduction</p> <p>The proposed settlement boundary changes in the Parish of Seend only relate to most of the village of Seend and not to Seend Cleeve and Sells Green.</p> <p>The Parish Council and the Neighbourhood Planning Group have looked at the settlement boundary methodology and have applied this to the existing settlement boundary and to the proposed changes.</p> <p>The Parish Council and the Neighbourhood Planning Group are in complete agreement on the points made in this submission.</p> <p>Overall we cannot see why it is necessary to change the existing settlement boundary, in most instances.</p> <p>We request that the original settlement boundary is maintained, with a few exceptions that are listed below.</p> <p>Specific Comments</p> <p>Commencing at the western boundary F8/G8 (West), we do not agree that this site should be included within the settlement boundary as the site is more related to the open countryside especially in relation to the expansive views it provides.</p> <p>G7 Bradley Lane entrance to School Road we agree to this change as it tidies up this boundary.</p> <p>H6 WI Allotments and 17/16 the Lye Field we contend in the strongest possible terms that these two areas are recreational and amenity spaces that are part of the settlement and that they relate more closely to the built environment.</p> <p>K6 - Horse Pond - we are content with the proposal to tidy up the boundary in this area.</p> <p>J7/17 - We cannot agree with the proposed boundary changes to the large houses on the south side of Seend High Street as they include the extended curtilage of these properties that relate more closely to the open countryside as they are gardens/paddock s and consequently has the capacity to substantially extend the built form of the settlement in terms of scale and location.</p> <p>H8/18 We do agree with the inclusion of the Church at the end of Church Walk and the inclusion of three houses one in Church Walk i.e. H7 the Old Stables and the house on the corner of Church Walk together with Seend House as we contend that these buildings are 'the curtilage of a property that relates more closely to the built environment and has limited capacity to extend the built form of the settlement in terms of scale and location'. The line of trees, we contend is part of amenity space at the edge of a settlement that relates more closely to the built environment. We do not agree with including the other parts of this area in H7. We have re-defined the settlement boundary as is shown on the map in H7 because this is now more consistent with other zones on the map.</p> <p>In H7 - It is inconsistent to move the settlement boundary along the High Street, to the north of it but in 17 and J7 to bring the settlement boundary back to the south of the High Street.</p> <p>G8 (South) we agree with the tidying-up of this small sector.</p>				

	We request that we are kept informed at each stage and reserve the right to be involved with the progress of the policy on the settlement boundaries until its adoption in Winter 2018.
Attached files (Please see Objective)	4717767
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1641	Consultee Mr Rohan Torkildsen Historic Environment Planning Advisor South West/ West Midlands Historic England Person ID: 403792	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	The whole document				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Draft Wiltshire Housing Site Allocations Plan</p> <p>Thank you for providing an opportunity to respond to this Draft Plan. We hope our comments will help to support the local authority in its preparation of a sound, robust and effective document and in so doing secure the delivery of sustainable development.</p> <p>A key reference that has informed our following response is that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment, and special regard should be paid to the desirability of preserving or enhancing designated heritage assets. (NPPF paragraphs 126, and 132 and the Planning (Listed Buildings and Conservation Areas) Act 1990).</p> <p>It will be important for the local authority to clearly demonstrate that the approach to development affecting designated and non-designated heritage set out in this Plan is justified, consistent with national policy, and likely to be effective in helping to deliver the Wiltshire Core Strategy's vision and objectives and its policies which emphasise a positive commitment to the conservation of Wiltshire's historic environment and to high quality design.</p> <p>Historic England believes that it is clear from the NPPF that the Government is expecting local planning authorities, through their Local Plans, to actively deliver the conservation and enhancement of the historic environment. The Government's use of the words and phrases "seeking positive improvements", "positive strategy", "deliver the conservation and enhancement" and "a clear strategy for enhancing" all demonstrate that it is not sufficient for local planning authorities to be passive or merely reactive in the conservation and enhancement of their historic environment and the preparation of this Site Allocations Plan.</p> <p>Evidence base to inform a positive strategy for the Historic Environment</p> <p>It will be critical for you to present, for consideration, adequate evidence (in accordance with NPPF paragraphs 129, 158 and 169) that demonstrates the local authority has considered the impact of each relevant allocation to determine the level of effect (harm) on the significance of affected heritage assets and their setting. I note that the SA and Landscape Assessment undertaken provide some commentary but are in themselves insufficient. They both defer to the need for further work required to determine issues of significant importance that really need to be dealt with at the plan making stage and before the principal of development is determined.</p> <p>Before the principal, the future form and capacity of each site can be established, great weight must be applied to the conservation of the affected heritage assets in accordance with NPPF paragraph 132. A lack of evidence would suggest that great weight has not been applied and therefore that the Plan has not been justified (based on proportionate evidence) or accords with national policy nor the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that considerable importance and weight (special regard) is given to the desirability of preserving the setting of listed buildings. As planning decisions need to be taken in accordance with the development plan there needs to be a reasonable degree of certainty that a future application is deliverable. Is there a reasonable degree of</p>				

	<p>certainty that allocations affecting listed buildings would satisfy Section 66? When considering the soundness of the Plan the following question will no doubt be asked.</p> <p>In selecting the sites allocated for development, has the Council paid special regard to the desirability of preserving or enhancing designated heritage assets (Planning (Listed Buildings and Conservation Areas) Act 1990 and NPPF paragraph 132).</p> <p>National policy seeks to protect and or enhance where appropriate the significance of heritage assets. Only where harm is unavoidable should mitigation be considered (NPPF paragraph 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm. The local authority will therefore need to provide sufficient evidence to establish the level of impact / harm, and if harm were unavoidable, the justification.</p> <p>Historic England believes it is reasonable to expect a specific and moderately detailed heritage report – as evidence - that assesses whether, how and to what degree the setting of any effected heritage asset makes a contribution to its significance; and demonstrates the assessment of the effects of the proposed allocation on that significance to determine whether measures to maximise enhancement and avoid or minimise harm might be effective.</p> <p>Deferring an impact assessment to a future planning application stage is not considered appropriate as fundamental heritage considerations may affect the principle of development, its form and quantum, and as a consequence, its deliverability i.e. informing whether the allocation is justified. As such, when allocating a strategic site the local authority needs to set out clearly the type and amount of development that would be acceptable and provide details on how any affects to heritage assets can be addressed. The commentary provided by the local authority so far in respect of the impact of allocations in the Plan lacks detail or demonstrable rigour.</p> <p>The NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment and conserve heritage assets in a manner appropriate to their significance (NPPF paragraph 126). In terms of potential site allocations, we would suggest this means identifying sites for development which are compatible with the requirements of national policy for the delivery of sustainable development. At present the local authority has not demonstrated this would/could be the case in a substantive way.</p> <p>To address the above it may be useful to produce a specific heritage topic paper/statement making the case for the spatial strategy and individual allocations from a heritage perspective.</p> <p>Specific observations on individual suggested sites are included in the Appendix to this correspondence.</p> <p>We hope our comments will help to support the local authority in its preparation of a sound, robust and effective Site Allocations Plan and in so doing secure the delivery of sustainable development. At present there are important matters to be resolved for Historic England to be confident that the Plan accords with national planning policy.</p> <p>Nevertheless, following our recent meeting with officers at County Hall we remain optimistic of a positive response to the above is achievable and we continue to be available to further engage constructively to help support you finesse the Allocations Plan accordingly.</p>
<p>Attached files (Please see Objective)</p>	<p>4717797</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1642	Consultee Mr Rohan Torkildsen Historic Environment Planning Advisor South West/ West Midlands	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Historic England Person ID: 403792		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issues - heritage assets affected including the setting of listed buildings and cemetery Prior to the Plans submission a HE Assessment applying GPA3 – Setting guidance (link below) and NPPF policy/legislative tests is required to inform the principle, capacity and key design response to mitigate/minimise harm and enhance. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ The local authority is advised to apply its own Historic Landscape Characterisation and the resources of the Historic Environment Record. http://www.wshc.eu/our-services/archaeology/24-our-services/archaeology/113-historic-landscape-characterisation-project.html The SA indicates the site is of “Medium archaeological interest”. Is the local authority able to confirm it is satisfied that it is appropriate to undertake an archaeological assessment at the application stage that would allow an appropriate response, where necessary, as a result of the findings? See relevant national policy. This detached cemetery is clearly “at risk” (see photo). The Plan should address this matter as positive improvements are, where appropriate, required to accord with NPPF. para126. Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment1, including heritage assets most at risk through neglect, decay or other threats. The Site Allocations Plan will need to make reference in the text to the heritage issues, response and subsequent planning requirements.</p>				
Attached files (Please see Objective)	4717797				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1643	Consultee Mr Rohan Torkildsen Historic Environment Planning Advisor South West/ West Midlands	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Historic England Person ID: 403792		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issues – the site is described as being of “Medium archaeological interest” and within proximity to a Conservation Area and Listed Buildings. The Council’s Landscape Assessment (page 27) recommends a Heritage setting assessment is undertaken. As such, Historic England advise that prior to submission a HE Assessment is carried out applying GPA3 – Setting guidance (link below) and NPPF policy/legislative tests) to inform the principle, capacity and key design response/ principles to mitigate/minimise harm and enhance. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>The local authority is advised to apply its own Historic Landscape Characterisation and the resources of the Historic Environment Record. http://www.wshc.eu/our-services/archaeology/24-our-services/archaeology/113-historic-landscape-characterisation-project.html</p> <p>Is the local authority able to confirm it is satisfied that it is appropriate to undertake an archaeological assessment at the application stage that would allow an appropriate response where necessary as a result of the findings? See relevant national policy.</p> <p>The Site Allocations Plan will need to make reference in the text to the heritage issues, response and subsequent planning requirements.</p>				
Attached files (Please see Objective)	4717797				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1644	Consultee Mr Rohan Torkildsen Historic Environment Planning Advisor South West/ West Midlands	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Historic England Person ID: 403792		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issues - setting of St Johns Church and listed buildings including those along A361. Contribution of setting esp paddocks off lane, and to the rear of other listed buildings not referred to in Plan and perhaps therefore underappreciated/recognised? The site is described as being of "Medium archaeological interest". Historic England advise that prior to submission a HE Assessment applying GPA3 – Setting guidance (link below) and NPPF policy/legislative tests) is carried out to inform the principle, capacity and key design response/ principles to mitigate/minimise harm and enhance. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ The local authority is advised to apply its own Historic Landscape Characterisation and the resources of the Historic Environment Record. http://www.wshc.eu/our-services/archaeology/24-our-services/archaeology/113-historic-landscape-characterisation-project.html Is the local authority able to confirm it is satisfied that it is appropriate to undertake an archaeological assessment at the application stage that would allow an appropriate response where necessary as a result of the findings? See relevant national policy. Should the principle be accepted the Plan would need to make reference in the text to the heritage issues, response and subsequent planning requirements.</p>				
Attached files (Please see Objective)	4717797				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1645	Consultee Mr Rohan Torkildsen Historic Environment Planning Advisor South West/ West Midlands	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Historic England Person ID: 403792		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issues - Significant heritage assets would be affected. It is unclear whether and if so how the significance of affected heritage assets and their setting can be conserved in accordance with national policy. No doubt this site will be of considerable archaeological interest. The Plan at para 5.78 applies the wrong national policy test. Is the local authority able to clarify the “east of Lambrook stream” reference at paragraph 5.78. Historic England advise that prior to submission a HE Assessment is carried out applying GPA3 – Setting guidance (link below) and NPPF policy/legislative tests) to inform the principle, capacity and key design response/ principles to mitigate/minimise harm and enhance. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ The local authority is advised to apply its own Historic Landscape Characterisation and the resources of the Historic Environment Record. http://www.wshc.eu/our-services/archaeology/24-our-services/archaeology/113-historic-landscape-characterisation-project.html Should the principle be accepted the Plan would need to make reference in the text to the heritage issues, response and subsequent planning requirements.</p>				
Attached files (Please see Objective)	4717797				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1646	Consultee Mr Rohan Torkildsen Historic Environment Planning Advisor South West/ West Midlands	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Historic England Person ID: 403792		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Issues - There is a risk to the significance of several affected heritage assets including a Conservation Area, listed buildings and the wider historic landscape setting.</p> <p>No doubt this site will be of considerable archaeological interest. Is the local authority able to confirm it is satisfied that it is appropriate to undertake an archaeological assessment at the application stage that would allow an appropriate response where necessary as a result of the findings? See relevant national policy.</p> <p>Greater certainty/clarity is required re the degree of harm; the strategic layout and form of future development in response to this context. This is sensitive site and difficult to access and as it is a pivotal issue in relationship to the principle it needs to be resolved at the Plan stage and not left to any future application.</p> <p>A field boundary/lane divides the site north south and is a strong characteristic feature.</p> <p>Historic England advise that prior to submission a HE Assessment is carried out applying GPA3 – Setting guidance (link below) and NPPF policy/legislative tests) to inform the principle, capacity and key design response/ principles to mitigate/minimise harm and enhance.</p> <p>https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>The local authority is advised to apply its own Historic Landscape Characterisation and the resources of the Historic Environment Record.</p> <p>http://www.wshc.eu/our-services/archaeology/24-our-services/archaeology/113-historic-landscape-characterisation-project.html</p> <p>Should the principle be accepted the Plan would need to make reference in the text to the heritage issues, response and subsequent planning requirements.</p>			
Attached files (Please see Objective)		4717797			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1647	Consultee Mr Rohan Torkildsen Historic Environment Planning Advisor South West/ West Midlands	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Historic England Person ID: 403792		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issues – This is an important site in relation to the integrity of historic Salisbury and the relationship of the Cathedral to the wider landscape setting.</p> <p>No doubt this site will also be of considerable archaeological interest. Is the local authority able to confirm it is satisfied that it is appropriate to undertake an archaeological assessment at the application stage that would allow an appropriate response where necessary as a result of the findings? See relevant national policy.</p> <p>Historic England advise that prior to submission a HE Assessment is carried out applying GPA3 – Setting guidance (link below) and NPPF policy/legislative tests) to inform the principle, capacity and key design response/ principles to mitigate/minimise harm and enhance. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</p> <p>The local authority is advised to apply its own Historic Landscape Characterisation and the resources of the Historic Environment Record. http://www.wshc.eu/our-services/archaeology/24-our-services/archaeology/113-historic-landscape-characterisation-project.html</p> <p>Should the principle be accepted the Plan would need to make reference in the text to the heritage issues, response and subsequent planning requirements.</p>				
Attached files (Please see Objective)	4717797				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1648	Consultee Mr and Mrs Garth Jenkins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129695	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write to object most strongly to the proposed development of 650 houses on Netherhampton Road in Salisbury, and a further 1000 at Waldron's Field in Netherhampton itself.</p> <p>I object on the grounds that it is not sound policy as the consequences have not been fully considered, and it will not be effective.</p> <p>I use the A3094 regularly and already find it almost impossible in mornings and early evenings to travel at reasonable speed round the Harnham roundabout. Your plan to add a further approx 1000 cars to this congestion is completely without thought. The road cannot be effectively widened to allow for the increase in the volume of traffic and would necessitate the removal of the newly installed cycle path.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1649	Consultee E M Warton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129720	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to register my disapproval of any housing plan committed to "Plan Proposals" H3.1 – H3.3. My reasons for thinking this way is due to the spoiling of our countryside and the extra traffic that would without doubt be using the road between Netherhampton and Quidhampton. As it is, this area is already being used as a shortcut by traffic.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1650	Consultee Mrs Nicola Lipscombe Chair Salisbury Area Greenspace Partnership Person ID: 905964	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			Do you consider the draft WHSAP is sound?
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Response from Salisbury Area Greenspace Partnership (SAGP) to the Wiltshire Housing Site Allocations Plan, 2017</p> <p>Salisbury Area Greenspace Partnership (SAGP) accepts that in the current climate there is likely to be continuing pressure for development around the periphery of the principal settlement. However, there are general concerns about the loss of greenfield sites; the loss of reasonable quality agricultural land at sites S1027 & S1028 – land north & south of Netherhampton Road; the impact on the landscape character & setting of Salisbury at site S1027 & S3272 - Rowbarrow; & the impact on the community of increased congestion & reduced air quality. It is regrettable that the need for these additional sites are to meet the shortfall arising from delays in the development of brown field sites in the central area and due to a slow uptake of existing consents.</p> <p>For development to be successful & sustainable SAGP considers it important that i) the essential landscape qualities & character of the Salisbury area are protected & enhanced; ii) development is well designed & properly integrated with the existing settlement & not just added on around the settlement boundary in an isolated way, & iii) every effort is made to alleviate the severe strain on the existing transport infrastructure. This means ensuring effective green infrastructure (GI) is provided as an integral part of the development process in line with Government policy. For green infrastructure to be effective there needs to be a comprehensive network of dedicated off-road links that provide more direct connections between people’s homes & schools, work places, & key services, as part of a broader strategy so that there are benefits for the whole community & opportunities for future improvements are safeguarded.</p> <p>SAGP is concerned that this is not happening because there are continuing gaps in Wiltshire’s strategic planning policy framework as far as green infrastructure, open space & transport are concerned, & there are still no local or neighbourhood plans to ensure the aspirations of the local communities on these critical issues are being met. Developers are not being given strong messages, opportunities for planning gain are being missed & there is an undue reliance on planning conditions which are notoriously difficult to enforce.</p> <p>1.0 Green Infrastructure & its benefits</p> <p>The benefits of developing a comprehensive network of green safer corridors for people & wildlife as part of the green infrastructure of a community has long been recognised. Its importance as essential infrastructure is acknowledged in the Natural Environment Planning Policy Guidance (PPG) published in February 2016 which is a supporting document for the National Planning Policy Framework (NPPF) where it clearly states that ‘Green infrastructure (GI) is important to the delivery of high quality sustainable development, alongside other forms of infrastructure such as transport, energy, waste and water’. It goes on to state that ‘GI should be a key consideration in both local plans & planning decisions where relevant’.</p> <p>As the Natural Environment PPG spells out, effective GI encourages people to keep fit & active as part of their daily round & contributes to health & wellbeing. It provides opportunities for recreation, for getting close to nature, & for education. GI also delivers valuable ecosystem services if well managed, making the locality more resilient & sustainable (a Core Strategy goal in line with Government policy) by helping to maintain good air, soil and water quality, reducing the potential for flooding, providing good wildlife habitat and biodiversity, providing water filtration, carbon capture, & pollination services.</p>				

In addition, GI contributes significantly to the landscape setting of our communities, helping to create local distinctiveness & a sense of place which in turn has economic benefits, making the area an attractive one in which to live & work. Providing GI is a high impact/low cost approach as many green spaces already exist but need to be better linked together. It can also be used very effectively to create new landscape structure to integrate development.

2.0 Gaps in Wiltshire Council's strategic planning policy framework

2.1 Unfortunately, GI is not considered as essential infrastructure under the current Wiltshire Core Strategy Para 4.40.

2.2 There is still no published county-wide GI strategy, despite being promised over last 6 years, to highlight the importance of well designed & well managed GI which is essential to inform developers & should now be being promoted & secured in advance of any new development.

2.3 There is no local strategy for GI although SAGP is in the process of developing ideas for one & considers there is significant potential for improvements locally. From an initial assessment of local greenspace provision & connectivity, opportunities are being identified for improving connectivity in & around the city using off road routes & quiet streets where possible to create more direct, safer pedestrian & cycle routes between homes & schools, homes & work, & local facilities like shops, doctor's surgeries etc as well as links to city centre services, & with the countryside beyond.

2.4 It is also very disappointing that another key document, the Salisbury Transport Strategy 2012, has not been updated to include references to GI provision in the local area. Its main focus is on traffic management & junction improvements with very little emphasis on the importance & benefits of improving the off-road infrastructure for walking & cycling as part of a comprehensive green infrastructure (GI) network in line with current government guidance.

3.0 Gaps in the local strategic planning policy framework

SAGP has significant concerns about the apparent reliance on ad hoc approaches from landowners/developers without the benefit of an up to date spatial plan covering the main urban areas of Wilton, Salisbury & Laverstock & Ford, & adjoining parishes. The Salisbury Vision went some way to addressing local spatial planning issues but it did not relate to the whole of this area, & has now been abandoned. The Transport Strategy covers this area as does SAGP, but there is no other forum for bringing the 4 community areas & 10 parish councils together to be address the bigger picture in this area in relation to housing, employment, schools & other services & the infrastructure such as GI & transport which cross administrative & parish boundaries.

The absence of any neighbourhood plans or any joint working across the main urban areas makes it difficult for the community to raise the profile & potential of its green infrastructure when it comes to the consideration of new development. To quote the Natural Environment PPG again, 'GI should be a key consideration in both local plans & planning decisions where relevant'. It also states that 'local plans should identify the location of existing & proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design & management components of the GI strategy for the area will be delivered'.

Furthermore, the fact that no assessment of current county-wide GI provision has been carried out means that there is a lack of direction & the ability 'to inform the role of green infrastructure in local & neighbourhood plans, infrastructure delivery plans & Community Infrastructure Levy (CIL) schedules'. Natural Environment PPG.

4.0 Wiltshire Council's recent track record on planning decisions

SAGP is concerned that the weak strategic planning context for green infrastructure has compromised recent planning decisions when it comes to integrating large scale housing & mixed developments with existing development. Planning consents have been given to sites around the north & north-western fringes of Salisbury with little commitment to connectivity with the existing settlement as part of an effective green infrastructure strategy.

This has been the case at Fugglestone Red (1250 dwellings + primary school & employment land) & Erskine Barracks (290 units). A very recent example is at Longhedge Village, where planning consent was given for 670 units, a primary school & employment land without any off-road links to the existing adjoining development at Old Sarum, or the country park beyond, or to the city centre. This creates a physically isolated community where people have very little choice but to use their cars to access local facilities, adding to an already overloaded road network & causing more pollution & congestion over the wider area.

There also appears to be an undue reliance on planning conditions which are difficult to enforce particularly when the local authority has very limited enforcement capacity & the developer is focused on maximising profits, not on the needs of the wider community. It is important that these key GI elements are secured and safeguarded before the start of development as it is extremely difficult to retrofit afterwards.

	<p>Conclusion SAGP considers the overall basis for the Wiltshire Housing Site Allocations Plan is unsound because it is not consistent with national planning policy. There is no county-wide strategic commitment to green infrastructure as essential infrastructure in the Core Strategy; there is no approved county-wide GI strategy & there is no local GI strategy for the Salisbury area. Furthermore, the plan is not considered the most appropriate strategy in its current form & cannot be justified. The inclusion of S1027 North of Netherhampton Road is not supported for the reasons given, & sites S1028 South of Netherhampton Road & S3272 Rowbarrow would require adjustment in line with the suggestions put forward.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	to expand key points & clarify any issues arising from the submission.

Comment ID:	1651	Consultee Mrs Nicola Lipscombe Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Area Greenspace Partnership Person ID: 905964		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.2 Hilltop Way, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are no issues with this site provided the safeguards, including planting to integrate and enhance the scheme and maintaining public access, are met although SAGP regrets the further intrusion of housing onto the top of the downland setting of Salisbury & Laverstock.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	to expand key points & clarify any issues arising from the submission.				

Comment ID:	1652	Consultee Mrs Nicola Lipscombe Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Area Greenspace Partnership Person ID: 905964		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Development here would have a major impact on the western approach and gateway to Salisbury and on the river valley setting of the city and the cathedral. The site is identified in the Salisbury District Settlement Setting Assessment 2008 as distinctive and memorable and that the view should be conserved and enhanced. The provision of adequate planting and open space to integrate the scheme and maintain a soft edge to the north side of Netherhampton Road and the western edge of the urban area would only exacerbate the problem of maintaining open views to the cathedral. SAGP therefore does not support the proposal to allocate this area for housing.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	to expand key points & clarify any issues arising from the submission.				

Comment ID:	1653	Consultee Mrs Nicola Lipscombe Chair Salisbury Area Greenspace Partnership Person ID: 905964	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1 Netherhampton Road, Salisbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>If taken forward this large site needs more careful consideration with a landscape led master plan/development brief which makes full use of the undulating landform to provide a green infrastructure framework to accommodate the development, in line with the mitigation measures recommended in the Site Landscape Assessment Part 2, June 2017 & to ensure that key views & the quality & character of this important approach to the city are protected.</p> <p>The proposed allocation & master plan should be extended to include the south west corner of the site, as well as the adjoining excluded sites S237 and S3187 at West Harnham Business park to complete the picture. This would provide scope for providing 640 dwellings plus another 100 displaced from north of Netherhampton Road and 80 from Rowbarrow (see below), as well as land for employment, a primary school, a local centre, and country park for West Harnham as put forward in Policy H3.1. The master plan also needs to include S1027 North of Netherhampton Road to ensure that a comprehensive approach is taken towards a green infrastructure strategy for this area.</p> <p>The green infrastructure strategy should be extended to incorporate West Harnham and Netherhampton so that the new neighbourhoods can be effectively linked to local facilities in both places as well as the city centre, the secondary schools & colleges, employment centres, the hospital etc with a well-designed network of greenways, ie. off-road footpaths & cycleways & with a clear indication of how this will be achieved.</p> <p>This broader approach is needed because it will be difficult to break through the existing urban development to access local facilities in Harnham & there may be a need to consider the adjacent vacant sites & business uses for opportunities for restructuring the area as part of any development.</p> <p>Other important routes in the area will also require investment as part of this development. There is a need for green access links for walkers & cyclists to the rights of way along the River Nadder connecting with Broken Bridges. Broken Bridges will need widening & upgrading as will the Town Path, a very well used key route to the station and city centre which is already under pressure and clearly in need of improvement. It is essential that Foxmore Drove is retained & enhanced through the site linking to the Shaftesbury Drove which also needs some improvement works.</p> <p>These green access routes need to be secured before any development commences. There is also potential for establishing a more direct route to the hospital and East Harnham via existing greenways in the longer term, & a possible new route to Churchfields across the River Nadder would need serious consideration. Again, investment would be needed to improve these routes but they need to be identified and safeguarded as part of the broader green infrastructure strategy for the Netherhampton Road development, as well as more generally for Netherhampton, Quidhampton & Salisbury.</p> <p>The current requirement to limit all development to below the 75m contour is too simplistic. This should be the 65m contour at the eastern end of the site to protect the western shoulder and scarp slope of Harnham Hill (as established at the South Wiltshire Core Strategy Examination in 2010) rising to 75m over the south and west of the site. Any development footprint should follow the contours/landform rather than the site boundary as referred to in the Site Landscape Assessment document.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

to expand key points & clarify any issues arising from the submission.

Comment ID:	1654	Consultee Mrs Nicola Lipscombe Chair Salisbury Area Greenspace Partnership Person ID: 905964	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1 Netherhampton Road, Salisbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>If taken forward this large site needs more careful consideration with a landscape led master plan/development brief which makes full use of the undulating landform to provide a green infrastructure framework to accommodate the development, in line with the mitigation measures recommended in the Site Landscape Assessment Part 2, June 2017 & to ensure that key views & the quality & character of this important approach to the city are protected.</p> <p>The proposed allocation & master plan should be extended to include the south west corner of the site, as well as the adjoining excluded sites S237 and S3187 at West Harnham Business park to complete the picture. This would provide scope for providing 640 dwellings plus another 100 displaced from north of Netherhampton Road and 80 from Rowbarrow (see below), as well as land for employment, a primary school, a local centre, and country park for West Harnham as put forward in Policy H3.1. The master plan also needs to include S1027 North of Netherhampton Road to ensure that a comprehensive approach is taken towards a green infrastructure strategy for this area.</p> <p>The green infrastructure strategy should be extended to incorporate West Harnham and Netherhampton so that the new neighbourhoods can be effectively linked to local facilities in both places as well as the city centre, the secondary schools & colleges, employment centres, the hospital etc with a well-designed network of greenways, ie. off-road footpaths & cycleways & with a clear indication of how this will be achieved.</p> <p>This broader approach is needed because it will be difficult to break through the existing urban development to access local facilities in Harnham & there may be a need to consider the adjacent vacant sites & business uses for opportunities for restructuring the area as part of any development.</p> <p>Other important routes in the area will also require investment as part of this development. There is a need for green access links for walkers & cyclists to the rights of way along the River Nadder connecting with Broken Bridges. Broken Bridges will need widening & upgrading as will the Town Path, a very well used key route to the station and city centre which is already under pressure and clearly in need of improvement. It is essential that Foxmore Drove is retained & enhanced through the site linking to the Shaftesbury Drove which also needs some improvement works.</p> <p>These green access routes need to be secured before any development commences. There is also potential for establishing a more direct route to the hospital and East Harnham via existing greenways in the longer term, & a possible new route to Churchfields across the River Nadder would need serious consideration. Again, investment would be needed to improve these routes but they need to be identified and safeguarded as part of the broader green infrastructure strategy for the Netherhampton Road development, as well as more generally for Netherhampton, Quidhampton & Salisbury.</p> <p>The current requirement to limit all development to below the 75m contour is too simplistic. This should be the 65m contour at the eastern end of the site to protect the western shoulder and scarp slope of Harnham Hill (as established at the South Wiltshire Core Strategy Examination in 2010) rising to 75m over the south and west of the site. Any development footprint should follow the contours/landform rather than the site boundary as referred to in the Site Landscape Assessment document.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

to expand key points & clarify any issues arising from the submission.

Comment ID:	1655	Consultee Mrs Nicola Lipscombe Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Area Greenspace Partnership Person ID: 905964		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		This is an overdevelopment of this site, originally safeguarded from development above the 75m contour to protect the downland setting on the south side of Salisbury. Only 22 units can be achieved in the north-west corner of the site as proposed in the earlier consultation on potential site options. Any development on the higher ground south of the existing Rowbarrow development would obstruct commanding views of city & wider landscape from Old Sarum in the north west to the Avon Valley and Alderbury in the south east. This panoramic view is an essential component of the setting for the Woodbury Ancient Villages Scheduled Monument and Salisbury generally. The site (if no longer in sustainable use) offers greater potential as a future country park for east Harnham to protect the higher ground, the eastern shoulder of Harnham Hill, which forms the southern backdrop to the city.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		to expand key points & clarify any issues arising from the submission.			

Comment ID:	1656	Consultee Mrs Nicola Lipscombe Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Area Greenspace Partnership Person ID: 905964		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This is an overdevelopment of this site, originally safeguarded from development above the 75m contour to protect the downland setting on the south side of Salisbury. Only 22 units can be achieved in the north-west corner of the site as proposed in the earlier consultation on potential site options. Any development on the higher ground south of the existing Rowbarrow development would obstruct commanding views of city & wider landscape from Old Sarum in the north west to the Avon Valley and Alderbury in the south east. This panoramic view is an essential component of the setting for the Woodbury Ancient Villages Scheduled Monument and Salisbury generally. The site (if no longer in sustainable use) offers greater potential as a future country park for east Harnham to protect the higher ground, the eastern shoulder of Harnham Hill, which forms the southern backdrop to the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	to expand key points & clarify any issues arising from the submission.				

Comment ID:	1657	Consultee Newland Homes Person ID: 395553	Agent Mr Chris Beaver Director Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Proposed allocation: the proposed allocation of Upper Studley under Policy H2 is supported in principle. However, the suggested quantum of development, 20 units has been arbitrarily reduced, without clear technical justification.</p> <p>The net developable area of the site is approximately 1.7ha when account is taken of flood modelling, which has excluded the areas of the site within Flood Zones 2 and 3. If new residential development is proposed at 30dph this would yield a total quantum of circa 50 units. This quantum of development also aligns with apre-application proposal that was discussed with the Council in 2016.</p> <p>Land ownership: Newland Homes hold a subject to planning option on the site, which extends to 2.27ha (refer enclosed Site Location Plan Drg. 14.111.101)</p> <p>Summary overview of site promotion: Newland Homes appointed a consultant team in 2014 to evaluate the subject site. Preliminary representations were submitted in May 2014 in response to the 'call for sites' to inform the Council's SHLAA.</p> <p>Subsequent to the initial SHLAA submission, Newland Homes undertook more detailed landscape, ecology, and access studies which informed an iterative pre-application process, which was submitted to the Council in January 2016 (16/00517/PREAPP). The initial submission proposed a scheme of 59 No. dwellings and included the following technical information:</p> <p>Landscape and Visual Appraisal – MPH Ecology Survey Report – Starkecology Breeding Bird Survey Report – Starkecology Otter and Water Vole Survey Report – Starkecology Reptile Survey Report – Starkecology Bat Survey Report - Starkecology Transport Statement– WYG Tree Survey – Alan Engley Associates</p> <p>Following an iterative dialogue with the planning officer, and internal consultees, revised plans were submitted in April 2016, with again in July 2017. This reduced the quantum of proposed development to 52 No. dwellings. The layout was considered to be broadly acceptable by the planning officer in urban design terms, and the priority access junction from Firs Hill (the A361) was considered acceptable by the Highway Authority. However, the landscape and arboricultural officers required more information in relation to the long-term management / replacement of the existing tree belt alongside the Lambrok watercourse.</p> <p>Technical work in progress: following a meeting with Wiltshire Council's Spatial Planning Team in August 2017, Newland Homes are progressing detailed flood risk, drainage and arboricultural impact assessments to inform future discussions.</p> <p>Deliverability: Subject to the grant of outline planning permission in 2018, the subject site is capable of being fully delivered between 1-5 years of the grant of planning permission.</p>				

	<p>Statement of Common Ground: Newland Homes are committed to continue to work proactively with the Council to ensure the delivery of this site. It is proposed that a a Statement of Common Ground will be agreed with the Council in advance of the publication of the 'Submission' version of the draft Wiltshire Housing Site Allocations Plan in 2018.</p> <p>Policy H2.5: the quantum of residential development to be increased from 20 units to circa 40-50 units.</p> <p>Paragraph 5.73: the extent of application site measures 2.27ha not 2.33ha as stated.</p>
<p>Attached files (Please see Objective)</p>	<p>4718182</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Newland Homes wish to be represented at the examination to assist the consideration of the technical issues, and to answer any technical or planning policy related queries that may be raised in the round table discussion by interested parties.</p>

Comment ID:	1658	Consultee Redcliffe Homes	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 901813	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy H2: notwithstanding the relatively advanced stage of the Regulation 16 stage of the Bradford on Avon Neighbourhood Plan; and the progress that has been made in respect of housing delivery in Bradford on Avon against the Core Strategy's disaggregated targets for each community area, we consider that the draft Plan should be making provision for additional growth in Bradford on Avon on the following basis: The draft Plan has taken a minimal and conservative approach to new housing growth in the North and West Housing Market Area over the Core Strategy Plan period to 2026.</p> <p>The draft BoANP is restraint plan that does not propose any housing allocations.</p> <p>There is an unmet affordable housing need in Bradford on Avon, which can only be addressed by the provision of new housing.</p> <p>A number of the allocated Core Strategy strategic sites, and proposed draft allocated sites in the North and West Housing Market Area are not deliverable within the next 5 years due to technical constraints, and political hostility which will further slow delivery.</p> <p>The Housing White Paper (February 2017) seeks to diversify the supply of new housing in response to the dominance of the national / PLC volume home builders. The subject site is of a size (circa 2 ha) that is suitable for development by a local / regional housebuilder.</p> <p>It is submitted that in order to ensure a deliverable 5-year housing land supply and the Core Strategy housing requirement in the North and West Housing Market Area, and specifically, to meet the need for new affordable homes in Bradford on Avon, that the subject site should be included as an allocation for circa 45 homes in the draft Plan.</p> <p>Promotion History Redcliffe Homes have held an option on the subject site for a number of years and fully participated in the Core Strategy process and have made successive SHLAA and BOANP submissions.</p> <p>Redcliffe Homes have established a comprehensive technical evidence base for the site across all applicable disciplines. A speculative outline application was submitted in January 2017. This application was subsequently withdrawn in August 2017 to allow for further design development to address comments raised by the statutory consultees (Ref: 16/12377/OUT). A new proposal for circa 45 units is currently being formulated.</p> <p>Statement of Common Ground: Redcliffe Homes are willing to work collaboratively with Wiltshire Council to progress a Statement of Common Ground in advance of the finalisation of the 'submission' version of the Draft Plan.</p> <p>Policy H2: Wiltshire Council to allocate the subject site for circa 45 dwelling units, as outlined in red on the enclosed Parameter Plan (Ref: 057-007C).</p>			
Attached files (Please see Objective)		4718203			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To make the planning case for the subject 'omission' site to be included as an allocation in the draft Plan.			

Comment ID:	1659	Consultee Paul Skelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129817	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My two main concerns for objecting to this development are firstly the fact that Bratton is a village in a Conservation Area and a project of this size and density will completely destroy that character and secondly as a daily user of the B3098 I know that this stretch of road simply can't cope with any increase in traffic at peak times.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1660	Consultee Mrs Fiona Fox Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Warminster Town Council Person ID: 1129823		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Town Council feels this site meets the aspirations of the Warminster Neighbourhood Plan (section 4.2, third row), which aspires to: “A spread of new developments around the town to avoid imbalance caused by significant developments in any one area.” However, they believe this should not be brought forward before 2026, the period of the Neighbourhood Plan and Core Strategy, as the sites already allocated in the west should be developed first. This site could be included when considering the town’s future planning needs post 2026 when additional sites may need to be identified. Defer any plans for this site until after the period of the Wiltshire Core Strategy and Warminster Neighbourhood Plan.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Councillor Tony Nicklin has been nominated to speak on behalf of the Council and the Neighbourhood Plan Policy Review Group.			

Comment ID:	1661	Consultee Mrs Fiona Fox Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Warminster Town Council Person ID: 1129823		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.8			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Town Council feels this site is unsuitable for housing due to its proximity to the biodigester. It would destroy any buffer to the bypass and the air quality would be an issue. This would not fit with Neighbourhood Plan policy L1 which includes 'Maintains a quality of life'. The site is inappropriate for residential properties and lends itself to commercial use. Remove this site for housing allocation.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Councillor Tony Nicklin has been nominated to speak on behalf of the Council and the Neighbourhood Plan Policy Review Group.				

Comment ID:	1662	Consultee Mrs Fiona Fox Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Warminster Town Council Person ID: 1129823		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.52				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. The proposed lines now shown on the map, page 28 of the WCATP, do not show the current planning status accurately. They exclude the Core Strategy, the proposed SHLAA sites referred to in our earlier comments, and extant planning and completed permissions.</p> <p>2. The omission of the Core Strategy boundaries might prejudice the Appendix D Assessment Criteria, which are the basis for many of the SHLAA site selection process decisions. These could declare the process flawed, if the settlement boundaries are not correct, in particular the exclusion criteria set out in table D2 stage 2A questions 1 & 2. Further issues occur when assessing any SHLAA site on the basis of its separation from the boundary, or not being adjacent to it (see sites 2091, 1007 and 1030 for example)</p> <p>3. The new Core Strategy Areas represents a considerable expansion of the Town and Settlement Boundary, and even if the exact line cannot be currently defined (due to house positions not being agreed) then due regard must be made as if the boundary line is the same as the Core Strategy's allowance. This line can then be tightened up later.</p> <p>4. Refer to the schedule of specific comments in section 7 below, based upon the same grid reference table A1 on page 29 of the WCATP. For convenience we have started at the same grid reference point G9, G10. All proposals in the WCATP table are accepted, these are:</p> <ul style="list-style-type: none"> • excluding existing recreational spaces • following curtilages of existing properties • excluding physical features such as roads, e.g. transferring the existing line to the other side of the road • including newly built residential and commercial developments • Including existing properties physically related but not necessarily directly attached to the existing settlement • Excluding land more closely related to the countryside <p>We have also added our further comments where the principles used in the table have not been consistent throughout the boundary review.</p> <p>We would invite WC to meet with WTC and review the proposals and discuss and assess each comment individually with larger scale drawings.</p>				

ITEM NO.	MAP GRID REFERENCE	PROPOSED AMENDMENT OR CORRECTION
1	G9, G10	Agree with exclusion of the Warminster Common and Allotments.
2	F11, G11	Refer to section 1 of our response. We do NOT accept the use of SHLAA sites 1032 and 302 for residential housing.
3	G11 AND 12	The existing commercial Biogas site should be included as a detached site including its extant planning for commercial employment expansion.
4	J10	The newly developed extension to Damask Way should be included within the boundary.
5	I8	The proposed line should include the Football Club car park and clubhouse within the new green space.
6	N9	The small area alongside Boreham Road and rear of Rock Lane houses is currently subject to a planning application for which WTC has recommended refusal, but not yet determined by WC.
7	09 & 010	The SHLAA site refer 304 recently approved by Secretary of State and included in the WCATP should be included linked to the existing Boreham Road properties.
8	010	The newly built housing development (ex. Bus Depot) should be included as a detached site.
9	P8 & P9	The SHLAA site ref 603 included in the WCATP (accepted in section 1 of this response) should be included and attached to the existing line.
10	05	Why is this MOD building included with a narrow access line? Why has this MOD area been included, for the first time, together with all of the military barracks and ABRO workshops? This area has a barbed wire fence line and is not available to the public.
11	M5 to 03	This area is all military residential areas and accessible to the public, hence accepted as a detached site.
12	L3 to M4	This area is also an extensive military residential area and accessible to the public, and should also therefore be accepted as a detached site.

13	N4 to Q1	All the military units (inc. residential housing) are much more extensive over the grid N4 to Q1, and we question what policy or logic has been applied in order to understand why only part of this considerable area has been identified for inclusion with the new settlement boundary and others not included.
14	K4 & K3	The inclusion of the residential units along Elm Hill has been accepted, but the policy has not been applied consistently around the town boundary on similar properties.
15	G2, H2 & H3	The far north east end of the Warminster Business Park (access from Furnax Lane) goes right up to the railway lines, and is mostly built on. These are existing employment areas.
16	G4	This site has also planning permission, and is part of the Warminster Business Park.
17	H5	We recommend including the Minster Church car park with the churchyard boundary.
18	G5 & H5	We believe that it would be beneficial to include the Warminster School main grounds including the pool, workshops and Furneaux House as well as the hard sports courts within the new boundary. This would, however, exclude the green area sports field and pitches.
19	G4	Include the perimeter of the recently approved Traveller settlement at the corner of Bath Road and Coldharbour Lane.
20	F3 & G4	Include properties known as the White House and 109 Bath Road to be consistent with the policy of existing "built development physically related to the settlement". These properties are to be fully enclosed by the Core Strategy West Urban Extension.
21	E/F3 to B/C9	The new Wiltshire Core Strategy – Warminster West Urban Extension (WWUE) extends from the Bath Road, grid F3 to B8, on the north side of Victoria Road. This settlement boundary extension will need to be added at some time in the future when the full detailed site layout is approved. Noting that there will be extensive use of buffer zones along the A36 as well as internal to the new site.
22	B8 & D9	<p>The southern side of Victoria Road contains the remaining part of the WWUE, and consists of three separate sites:</p> <p>The Redrow site (known as Tascroft Rise) is already with full approval and under construction. The new boundary can therefore be extended from St Andrews Road and Folly Lane.</p> <p>The Persimmon Site (known as Bugley Farm) has not yet been approved, but an application is under review. The site will enclose the Bugley Barton Farm House which therefore should be included within the new boundary.</p>

			The remaining site (known as Folly Farm) does not as yet have any planning proposals, but remains within the designated WWUE.
	23	C9	The Rugby Club and grounds will be surrounded by the WWUE, but should be excluded from the settlement.
	24	E6 to G5	This area known as SHLAA 1007 Grovelands is subject to a current planning application (exception site), with 17 acres set aside as open space. If this site is approved the settlement boundary will need to be adjusted accordingly.
Attached files (Please see Objective)			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Councillor Tony Nicklin has been nominated to speak on behalf of the Council and the Neighbourhood Plan Policy Review Group.		

Comment ID:	1663	Consultee Jeremy and Katie Hawkins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129836	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My wife and I are residents of Crudwell and we wish to make the following representations concerning the proposed Ridgeway Farm site allocation in the Draft Site Allocations Plan.</p> <p>The proposed allocation of a further 40 houses at the Ridgeway Farm site (in addition to the ten under construction) will increase the size of Crudwell by some 20%. This is very disproportionate and we question whether there is a clear and identifiable need for so many additional houses in the village.</p> <p>A Neighbourhood Plan for Crudwell is being produced. This will include an assessment of current and future housing needs in the village and the existing capacity for future development and its sustainability. Residents will be consulted and we intend to contribute to the Plan to help it be produced as quickly as possible. We request that any decisions on future development in Crudwell should take the Plan into consideration.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1664	Consultee Jeremy and Katie Hawkins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129836	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The existing infrastructure and amenities within the village cannot support such a large increase in dwellings. For example: The road access to the site (Tetbury Lane) is narrow with no pavement and the increased traffic would further increase the risk of accidents to both vehicles and particularly pedestrians.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1665	Consultee Jeremy and Katie Hawkins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129836	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The existing infrastructure and amenities within the village cannot support such a large increase in dwellings. For example: The surrounding surface drainage, both natural and piped, already struggles and there is the risk of further flooding to the area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1666	Consultee Jeremy and Katie Hawkins	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129836	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The existing infrastructure and amenities within the village cannot support such a large increase in dwellings. For example: The local school is already at capacity and cannot take any more pupils without additional facilities being built on its playing field.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1667	Consultee Mr Ken J McCall Co-ordinator	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Campaign For A Better Trowbridge		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are extremely concerned about the extra housing allocated to Wiltshire, particularly West Wiltshire because the present infrastructure is struggling to cope with the current population! We realise that your staff are under extreme pressure from central government to comply with their instructions to provide all these extra houses but we have to consider the adverse affect on the residents, particularly people in Trowbridge and surrounding villages. Would you please reply explaining exactly how these housing figures have been calculated?</p> <p>One of our many concerns is that these proposed houses in and around Trowbridge will have a very damaging affect to wildlife and the Bechstein's bat that has a maternity roost in the ancient Biss/Green Lane woods. We would remind you that Prof John Altringham spoke at the Wiltshire Core Strategy Examination in Public in 2013 advising against the Ashton Park development of 2600 houses! Although bat specialists warned against building the 650 houses at Castlemead, Trowbridge, the development went ahead!</p> <p>The following proposed sites, if built, would also affect bat habitats and their commuting corridors:- Southwick Court, Church lane, Southwick, North Bradley, Hilperton Gap, Upper Studley and Elm Grove Farm. Unfortunately these housing estates are mainly developer designed and car-based which contradicts central governments policies of walking, cycling and public transport. We have observed that some of the neighbouring counties do not have the same high allocation of houses.</p> <p>For many years we have promoted a "Brown Field First" policy and have advised that sites like Bowyers should be developed before considering green fields. Bowyers is ideally located near the railway station (which needs improving) and would be perfect for low rise quality flats for young families, older people or single professionals. An excellent example of well designed, sought after flats can be seen in Holland where communities are thriving amid an integration of pleasant flats, houses, landscaped areas, shops, employment, doctors surgeries, sports facilities, schools and the essential amenities that are a result of good town planning.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1668	Consultee Mrs Fiona Jupp Person ID: 1129853	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.13 Crudwell				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Site Allocation Plan Crudwell proposals - Ridgeway Farm</p> <p>I am writing to comment on the draft Wiltshire Housing Site Allocation Plan (WHSAP) and specifically in relation to the village of Crudwell where I live.</p> <p>I have lived in the village with my husband for the past six years, and am some 200m from where existing development has started (10 houses) and where a proposed allocation of a further 40 dwellings are planned. I am extremely concerned about the proposed allocation of the additional 40 dwellings for the reasons set out below.</p> <p>General policy issues</p> <p>The Site Allocation Plan notes that housing will only be allocated by Wiltshire Council where there is a strategic priority to do so. Whilst I fully understand that Wiltshire Council needs to ensure an adequate five-year housing supply across each housing market area, the Site Allocation Plan would result in an over-supply of 4,284 dwellings to 2026 once past completions, deliverable commitments and windfall sites are taken into account. Even if one were to assume (unlikely) that there would be no windfall sites, the over-supply would still be 2, 198. The Site Allocation Plan further results in an over-supply of homes in the Malmesbury Community Area, even without windfalls. It is clear, therefore, that there is no strategic need to identify any new homes in Crudwell.</p> <p>Wiltshire's Core Strategy identifies Crudwell as a "large village". Policy 1 of the Core Strategy notes that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities".</p> <p>Crudwell specific issues</p> <p>I acknowledge that Crudwell has been late in producing a Neighbourhood Plan, due in part to a Parish Council which was struggling to attract members and to function adequately. This has now been addressed, and the village has started to work on a Neighbourhood Plan. As part of this we will be undertaking a survey to determine the extent of local need for housing and other land uses. This local need will be considered in the context of other constraints to determine where and how any identified local need can be met.</p> <p>Crudwell is unsuitable for large-scale development for a number of reasons.</p> <p>New homes will require additional space at the CE Primary School. I understand that the Council's Education Department considers that at least one new classroom will be required. The school is on a constrained site and lies in a conservation area, so its ability to expand is not guaranteed.</p> <p>The village has severe flooding problems. A large proportion of the village is at risk of flooding from waterways , surface water, or both.</p> <p>The road capacity is already constrained, with dangerous speeding both along the A429 and Tetbury Lane.</p> <p>The proposed development is in a conservation area and little attention has been paid to the environmental and ecological impacts of this.</p> <p>Our house specific issues</p> <p>The noise and disturbance from the existing development of 10 new houses is already very intrusive. A large-scale development site lasting several years will be unbearable to live with.</p>				

	<p>Views across open farmland (in a conservation area) will be lost forever. The public right of way leading from the development runs right past our house. There will be increased footfall, noise, loss of privacy, dog-fouling and littering. Overall As there is no strategic need for large-scale development in Crudwell, I consider that it would be more appropriate for the Neighbourhood Plan to determine the level of local housing need, to consider how the existing infrastructure might be expanded to accommodate any needs and to consider the wider issues identified above. Crudwell is not anti-growth . However, I believe that small pockets of individual development, in keeping with the existing infrastructure is far more suitable and sustainable, and would have a far less negative impact on the village. Just because an opportunistic land owner and developer have offered up a single site does not mean that this is the right solution for the needs of Crudwell and the wider Wiltshire housing need. I trust that Wiltshire Council will work constructively and sympathetically with the village of Crudwell to determine the most appropriate solution for all concerned.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1669	Consultee Institution of Engineering Designers	Agent Mr Jarrod Hill jh consulting architects ltd	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1129870	Person ID: 872070	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.58			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land at Courtleigh has been part of the settlement of Westbury (Westbury Leigh) for at least 50 years as developed land. The Institution of Engineering Designers have wholly occupied the site for over 40 years and</p> <ul style="list-style-type: none"> - Are happy with the proposed site inclusion within the settlement - Support the draft document - Note that inclusion of the site at this time corrects inconsistencies in pre-existing policy definitions with regard to the settlement boundary of Westbury / Westbury Leigh 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1670	Consultee Mr Norman Swanney	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 381339	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Site Allocations Plan</p> <p>1. I am writing to let you know that I do not consider the Draft Wiltshire Housing Site Allocations Plan to be a sound document for the following reasons:</p> <p>a) It unfairly targets Trowbridge for a large allocation of new homes where other North & West Wilts areas such as Bradford on Avon, Melksham and Chippenham have been spared. Between 2001 and 2015 the population of Chippenham has grown by 7.8%. In that same period Trowbridge's number have increased by 31.3%, without a corresponding proportionate investment in infrastructure over that time.</p> <p>b) After years in preparation, the Plan is rushed out for consultation at the start of the holiday season, making it difficult for people to have time to properly consider its implications.</p> <p>c) Holding the one open day in Trowbridge on 26th July as schools are breaking up for the summer look like a deliberate attempt to keep people away from the event. The event itself was inadequately resourced by Wiltshire Council and no printed copies of the Plan were made available to the public to take away.</p> <p>d) The Plan puts additional pressure on already overstretched infrastructure in Trowbridge's, traffic, schooling, health and other services without providing realistic plans to augment these.</p> <p>e) It rides roughshod over previous assurances that villages surrounding Trowbridge such as Southwick, North Bradley and Hilperton would remain as separate entities.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1671	Consultee Mr Norman Swanney	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 381339	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Proposal H2.6 – Site 3565 Land East of the A361 at Southwick Court</p> <p>2. I am also writing to oppose the inclusion of site 3565 (fields adjacent to Southwick Court) in the Site Allocations Plan for the following reasons:</p> <p>a) The land suffers from serious flooding which would not only jeopardise any new homes but would also threaten nearby existing properties with an increased risk of flooding.</p> <p>b) The land is bounded by an ancient and protected hedgerow which I believe cannot be legally breached and certainly should not be broken though as it is an important environmental asset.</p> <p>c) The site has been used by many generations for its current use of farming and recreational space and is a much appreciated and greatly valued asset to the local community.</p> <p>d) Building houses on this greenfield site when brownfield sites are available in the area is quite contrary to government assurances.</p> <p>e) This site has been opposed by Trowbridge Town Council and local alternatives for a greater number of dwellings identified. There is no need to lose this valuable green space for homes which will not be affordable to those who really need housing.</p> <p>f) Rare post-medieval earthworks will be destroyed by any housing development on this site.</p> <p>g) The sustainability appraisal for site 3565 admits that it is a less sustainable option for development, and that five moderate adverse effects have been identified in relation to this site. The inclusion of such a site gives the impression that it has been rushed into service just to make up the numbers. The statement that this site could substantially boost the supply of homes in the area is a “major beneficial effect” is derisive. Any site where building is allowed would provide this outcome and this assertion cannot be regarded as a positive argument in support of developing site 3565.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1672	Consultee Mr Norman Swanney	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 381339	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Sites: 1021 - Church Lane / 3620 - Upper Studley / 3565 - Southwick Court</p> <p>3. For good environmental reasons I also wish to oppose the development of the above sites:</p> <p>a) Taken together, development on these sites would only increase congestion on the roads for residents trying to reach their day-to-day needs for commuting, shopping, schooling, health and other services in the town and farther afield.</p> <p>b) Existing bus services are inadequate and infrequent, and cycling involves routes into Trowbridge which are daunting through having to share busy and narrow main roads with motor traffic.</p> <p>c) Trowbridge is a dormitory town for employment in Bath and Bristol but an inadequate and expensive rail service and awkward to reach station (from these sites) would simply add to commuting by car on congested narrow main roads. Roads to Bath and Bristol are already problematic in rush hour and trains are always overcrowded.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1673	Consultee Mrs Valerie Rideout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129887		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by ¼ during the Plan Period (and more after that) which exceeds the requirement for a 5 year supply. The Plan is not effective because WC's examination of "Windfall", which is expected to provide 60% of new housing is grossly inadequate – comprising one page out of 4500 pages of the plan documents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1674	Consultee Mrs Valerie Rideout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1129887		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1675	Consultee Mrs Valerie Rideout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1129887		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not consistent with National Policy because WC has failed to give a proper weight to Brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1676	Consultee Mrs J L Haden	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129909	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Please accept this as concern at the proposed allocation of an additional 40 houses at this site. I understand the initial 10 dwellings are being built here but this is a significant increase in the overall number of properties to be available and out of proportion to the actual housing needs in the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1677	Consultee Mrs J L Haden	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129909	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	In addition, the local facilities will be unable to accommodate such a significant increased demand.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1678	Consultee Mrs J L Haden	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129909	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a resident already experiencing consequences of surface water outside my property, as a direct result of challenges to the existing spring water table, I would be concerned for the Crudwell flooding record in general.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1679	Consultee Mrs J L Haden	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129909		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is not clear how the safety and viability of Tetbury Lane, with such additional traffic, has been considered in particular. It is to be hoped that representations of concern will be taken into consideration during the Council Site Allocation Planning meeting discussions.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1680	Consultee Karon Foster	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1129911	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I live in east harnham and I fully support the plan to build more houses, people need to live and make roots somewhere				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1681	Consultee Mark and Jill Funnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 381814	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Please see below my comments on the above consultation which I would like taken into account. Wiltshire is a rural county and the building of houses on greenfield sites should be restricted as much as possible to protect that. North Bradley should retain its status and identity as a village and not become part of Trowbridge. The buffer zone is very important. The solar farm fields on the North Bradley side already encroach on the open countryside which forms an oasis between North Bradley, Southwick and Trowbridge.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1682	Consultee Mark and Jill Funnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 381814	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Specifically to Trowbridge, there is a huge amount of support for building housing on the old Bowyers site. Is this not at all feasible or permissible.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1683	Consultee Mark and Jill Funnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 381814	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Southwick Court proposal includes open fields with footpaths which are used constantly each day by numerous walkers. It is a vital open area important for leisure.</p> <p>These fields support a huge variety of wildlife and are used daily, certainly by us and many residents of North Bradley, Southwick and Trowbridge by walkers. It is not a massive area which makes it even more valuable.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1684	Consultee Mark and Jill Funnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 381814	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is much confusion about the housing numbers needed and already supplied. There is a lot of conflicting information.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1685	Consultee Mark and Jill Funnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 381814	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The traffic on Southwick Road is already heavy both in volume and as a busy route used by lorries. North Bradley has enough to contend with without additional housing in the area adding to it.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1686	Consultee Lee Lee Vice Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		North Bradley Parish Council Person ID: 1129933		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.50			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The HSAP includes not only sites, but also proposes changes to settlement boundaries. Such boundary changes have consequences for the application of policy, for example in determining where a presumption in favour of certain development should occur. The following response deals with the settlement boundary issue first before moving on to consider the sites.</p> <p>The boundary reviews generally consist of 'good housekeeping' in terms of updating boundaries to take in areas of development that are logically part of the village and parish of North Bradley.</p> <p>2.1 It is noted that the boundary of the White Horse Business Park (WHBP) has been moved westwards (as indicated in red on the map below). The Parish Council would normally have objected to this as an encroachment into the Parish, However, the area is not indicated as being suitable for saving as part of the proposed landscape setting policy as identified in the Landscape Setting report that supports the HSAP (see Appendix 2). The Parish Council is aware of the need to argue from sound evidence, and also values the local employment that could be provided by an expansion of the WHBP, and therefore does not object to this expansion, subject the larger area identified in the emerging NDP being protected. It does suggest however that landscaping be provided as indicated in the Landscape Setting Report main map (see Appendix 2 and section 3 [in attached document]).</p>				
Attached files (Please see Objective)	4719610				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1687	Consultee Lee Lee Vice Chair North Bradley Parish Council Person ID: 1129933	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Introduction</p> <p>This is the formal response of North Bradley Parish Council to the 10-week consultation on the above draft plan. The Parish Council OBJECTS to the Housing Site Allocations Plan (HSAP) and in particular two of the three sites suggested for allocation within the Parish. While the Parish Council routinely comments on such consultations, the community are currently engaged in producing a Neighbourhood Plan (NDP) , and this gives an additional significance to the following comments, since good planning practice and Government guidance demands that good co-ordination is maintained between emerging strands of policy and that, wherever possible, conflicts should be reconciled and aims harmonised. Paragraph 157 of the NPPF says: Crucially, Local Plans should ... be based on co-operation with neighbouring authorities, public voluntary and private sector organisations.'. It does not seem to the Parish Council as if the standards set in the NPPF or in Planning Practice Guidance have been met in the preparation of the HSAP.</p> <p>DPD and NDP Sites</p> <p>3.0 It is regrettable that, despite the LPA's Link Officer being asked to provide maps indicating the landscape policy of the NDP on 19th April, (see Appendix 1 [in attached document] for e-mail) that the implications of the landscape setting policy for site selection for the HSAP were not communicated to the Spatial Planning HSAP team. Additionally it is a pity that the Steering Group were not in any case directly consulted about site selection in their area at the site selection stage, before the HSAP went out to consultation on 10th July. Had this happened, the HSAP team would have known that the area in which they have allocated sites, is likely to be subject to a landscape policy, reflecting the wishes of the community, that retains open space between Trowbridge and North Bradley.</p> <p>3.1 The Parish Council is also concerned about the validity of the planning argument in the HSAP – with some of the assertions appearing to be based on rather thin evidence.</p> <p>3.2 Overall, there is, unfortunately, a fundamental conflict between the emerging HSAP and NDP. However, as these are both at an early stage, it may yet be possible to harmonise them. Nevertheless, as things stand, the Parish Council finds itself in the position of having to OBJECT to the emerging Housing Site Allocations Plan on the following Grounds:</p> <p>3.3 Failure in Duty to Cooperate</p> <p>The HSAP has fallen short of the standards required by the 2011 Localism Act, which amended the 2004 Planning and Compensation Act, and subsequent Planning Practice Guidance and is therefore flawed and likely to be UNSOUND.</p> <p>'The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can</p>				

help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan'. Paragraph: Planning Practice Guidance, Neighbourhood Plans, 009 Reference ID: 41-009-20160211.

The NPPF (Para. 155) says:

Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

3.5 The North Bradley NDP has in fact been developing since November 2016. Early community engagement took place in February and March 2017. After conducting a considerable amount of research, Regulation 14 consultation for the NDP is now imminent and the NDP will shortly be submitted for SEA and HRA Screening. Community engagement revealed a strong desire to preserve the identity and setting of North Bradley village and to prevent it from losing its identity as a suburb of the principal settlement. The main evidence base for the plan is contained within a Scoping Report, which together with a professional Landscape Report (the latter given here in full as Appendix 2) indicate multiple reasons for retaining a landscape setting gap between Trowbridge and North Bradley on the grounds of setting, preventing coalescence that would lead to loss of local distinctiveness, and harm to biodiversity. Indeed the NDP is encouraged to create such a policy by virtue of paragraph 5.150 of the Wiltshire Core Strategy:

'It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.'

Given the existence of paragraph 5.150 and the emergence of the HSAP, it is surprising that Wiltshire Council did not realise the additional importance of ensuring co-operation with local NDP teams of the villages around Trowbridge. However, this may reflect a wider problem; the fact that Wiltshire Council does not seem to take neighbourhood planning as seriously as the regulations require.

3.6 It is accepted that some consultation with Parish Councils did take place, but Neighbourhood Plan Steering Groups are semiautonomous bodies, often made up of community members not members of the Parish Council. Simply consulting a Parish Council is no guarantee that this will result in effective consultation of any neighbourhood plan group. No effort was made to directly reach out to any NDP group in order to ascertain whether conflict was likely to arise between sites emerging there and those that could be considered for the HSAP.

The Wiltshire approach seems to fall short of what Planning Practice Guidance requires. PPG says:

'The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process'.

Paragraph: 009 Reference ID: 9-009-20140306

3.8 It goes on:

'Cooperation should take place throughout Local Plan preparation – it is important not to confine cooperation to any one point in the process. Local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages before options for the planning strategy are identified. That will help to identify and assess the implications of any strategic cross boundary issues on which they need to work together and maximise the effectiveness of Local Plans. After that they will need to continue working together to develop effective planning policies and delivery strategies. Cooperation should continue until plans are submitted for examination and beyond, into delivery and review.

Local planning authorities should bear in mind that failure to demonstrate compliance with the duty at the Local Plan examination cannot be corrected after the Local Plan has been submitted for examination. The most likely outcome of a failure to demonstrate compliance will be that the local planning authority will withdraw the Local Plan'. Paragraph: 012 Reference ID: 9-012-20140306

3.9 We have to ask, why was a simple audit not undertaken of emerging NDP sites? This could have taken the form of a questionnaire to all groups. Alternatively a working group could have been formed in all areas where areas were proposed including representatives of both NDP groups and the LPA. This would have indicated sites and possible conflicts at an early stage. Unfortunately the answer to this question seems to suggest that the Wiltshire Council's attitude to neighbourhood planning as a whole may be the cause.

3.10 Incorrect approach to neighbourhood planning in site selection

Verbal communication with the LPA seems to indicate that they believe a neighbourhood plan is 'not relevant' until it reaches the Regulation 16 stage. This is incorrect. It is disturbing that the LPA seems to believe that a neighbourhood plan about to embark on Regulation 14 Consultation is not worthy of consideration in site selection. If this really is the attitude of Wiltshire Council then it seems to conflict with that of the Government. Annex 1. Paragraph 216 of the NPPF says:

From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

3.11 Planning Practice Guidance Neighbourhood Planning para 07 adds:

'An emerging neighbourhood plan may be a material consideration. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies.... Decision makers should respect evidence of local support prior to referendum when seeking to apply weight to an emerging neighbourhood plan.It is for the decision maker in each case to determine what a material consideration is and what weight to give it.'

3.12 Wiltshire Council might say that they have complied with the above wording, in determining that the North Bradley NDP is not worthy of consideration at the site selection stage of the HSAP. However, the decision made is clearly wrong when one considers its effects. In the case of the North Bradley Neighbourhood Plan, these include a fundamental conflict between the emerging policies of both NDP and HSAP. This cannot be good planning and it suggests that the way the HSAP was developed was faulty.

3.13 The advice given in PPG is clear:

Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, as part of the development plan, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan' PPG Paragraph: 007 Reference ID: 41-007-20170728

3.14 In order to avoid conflicts such as the one that has arisen, and given the stakes in this case, it seems evident that any emerging neighbourhood plan likely to conflict with the sites selected by the HSAP should be taken account as soon as possible, and weight duly attached according to its stage of progress. As it is, there was no direct consultation between the HSAP and neighbourhood plan groups and the entire matter of neighbourhood planning took up just 3 paragraphs in the HSAP.

3.15 Topic Paper 2, paragraph 6.6 states that in Step 3 of the site selection procedure, note was taken '...of how work on Neighbourhood Plans has progressed since first considered at stage 2 and the extent to which they may contain housing proposals of their own.' However, this DID NOT occur at North Bradley where no contact was made by the LPA to the NDP team.

3.24 Nowhere in the supporting documentation (e.g. Topic Papers 2 and 4) of the HSAP is it clear that the impact of the proposed sites on North Bradley's setting was properly considered. Indeed the entire process seems to have been a 'top-down' strategic level exercise without the benefit of local knowledge that better integration with the neighbourhood plan process might have achieved.

3.27 Value and Reputation of Localism

At the present time, contrary to the spirit of Localism, Wiltshire Council appear to be pursuing their traditional 'top-down' view of planning. This one way street involves lower tier plans conforming rigidly with those in higher tiers. There is little or no room for ideas to flow back upwards, from the community.

3.28 There can be little doubt that, should the HSAP proceed on its current basis, then this would cut directly across emerging neighbourhood plans and would impose sites upon them. At the present time conflicts between the HSAP and neighbourhood plans are known to exist at:

Hilperton

Market Lavington

North Bradley

Southwick

It is known that these groups are currently considering making a joint submission to the Inspector should the HSAP be submitted in its current form. There will no doubt be many more groups with similar arguments. The cumulative effect of this will be to significantly degrade public

confidence in the neighbourhood planning process in Wiltshire. As neighbourhood plans have so far proved to be at least as good as LPA's in delivering sites nationally (as DCLG Studies 2015 and 2016 confirm) the ironic effect of this could be to actually slow housing delivery.

3.31 Value and Reputation of Localism
Localism, especially its more active arm – neighbourhood planning – has the potential to deliver many new homes and in many cases seems to be outstripping traditional local plans as a delivery mechanism. For example a DCLG study in October 2015 ('Neighbourhood Planning: progress on housing delivery') suggested that Neighbourhood Plans frequently allocated more housing than did their Local Plans. A follow up study in 2016, confirmed this and suggested that the average plan allocated 10% more than their LPA.

3.32 Neighbourhood Planning is therefore valuable, not only because it allows the community a democratic input into the planning process, but because it actually works – delivering more sustainable homes than traditional top-down methods. It should follow therefore that LPA's should be carefully cultivating this new arm of the planning process. However, in Wiltshire this does not seem the case, with little meaningful engagement leading to confusion and delay. Given the extent of the housing crisis this is most regrettable. Why was an audit of all neighbourhood plan sites not taken during the site selection process?

3.33 The problem with the current approach is that it is already leading to dissatisfaction with the neighbourhood planning process in Wiltshire and in North Bradley in particular. If this spreads then collectively it could act as a major deterrent to the entire concept in Wiltshire, leading to substantially less delivery of new housing.

The process of developing the HSAP demonstrates a failure in the Duty to Cooperate This not only a failure to comply adequately with the Localism Act 2011, but also conflicts with one of the Core Planning Principles of the NPPF, namely that; 'development should be genuinely planned, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area'. NPPF paragraph 17.

The HSAP demonstrates an incorrect approach to neighbourhood planning as a whole
It is clear that Wiltshire Council does not properly engage with neighbourhood planning, seeing it as an additional, almost optional element that has to fit in with the traditional top-down model. There is no recognition that the process should be a dynamic one with real two-way conversation and close linkages. In particular the LPA seems to believe that neighbourhood plans can be safely ignored until they have been submitted for examination. This is incorrect, bad planning and conflicts with Government guidance. This attitude has directly led to the present conflict that exists between the NDP and HSAP.

The HSAP clearly fails to fully consider the impact of the sites proposed on the setting of North Bradley
The Wiltshire Core Strategy specifically invites neighbourhood plan groups around Trowbridge to consider the future of the landscape gap between them and Trowbridge stating in paragraph 5.150:
'Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.'
Having set the North Bradley NDP on this course, Wiltshire Council then allocate three large sites in the very area in question without any direct consultation with the NDP group.

Value and Reputation of Localism
The HSAP as currently drafted is likely to seriously harm the credibility of neighbourhood planning in Wiltshire simply because it appears that neighbourhood plans have been paid scant regard in its creation. This will no doubt act as a deterrent to others currently considering making a plan. How real is Localism when it can be ignored and over-ridden by traditional top-down planning? The lack of a specific site audit direct from the neighbourhood planning groups is a serious omission in the HSAP, and the failure of Wiltshire Council to 'connect the dots', linking maps supplied by themselves for a landscape protection area at North Bradley with their HSAP is a serious error.

The Parish Council SUPPORTS the site at Elm Grove Farm, in order to deliver necessary housing for Trowbridge, but requests that the sites off the A363 at White Horse Business Park, and that at Southwick Court be removed in order to protect the landscape setting of North Bradley, local biodiversity and the reputation of neighbourhood planning in Wiltshire. Their selection is considered to be unsound for the reasons given.

Attached files (Please see Objective)

4719610

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1688	Consultee Lee Lee Vice Chair North Bradley Parish Council Person ID: 1129933	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		No	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3.16 HSAP is based on questionable argument for housing growth The Wiltshire Core Strategy indicates that additional housing is required for growth in Trowbridge. Core Policy 29 sets out that an additional 960 dwellings should be developed at the town ...' and the HSAP itself is foreshadowed; 'Further land for housing development at Trowbridge will be identified in the Housing Site Allocations DPD...'. However at no point is the fact that these houses might have to be accommodated within North Bradley parish mentioned – an example of poor drafting that effectively denied the community awareness that this might happen.</p> <p>3.17 However, there is a more serious objection to the HSAP's interpretation of the above policy. The HSAP states (4.52) '...housing development at Trowbridge will fall short of the WCS indicative level of 6,810 dwellings by around 1,220'. But, this assessment is based on the un-verifiable assumption that the Ashton Park will be much slower in delivery than anticipated and that sites for additional homes therefore need to be identified to avoid a shortfall in housing land supply later in the plan period. In fact the HSAP acknowledges that of the projected shortfall of 1220, fully 1000 come from the assumption that 1000 homes now will not be delivered within the WCS plan period (up to 2026) as thought.</p> <p>3.18 However, this assumption about Ashton Park relies simply on the word of the developers who supplied this estimate to the LPA. This cannot be considered to be reliable. The developers may have a vested interest in encouraging the belief that delivery will be slow (so as to get other land allocated in the HSAP). They are certainly not equipped with a crystal ball and cannot therefore accurately predict delivery ahead.</p> <p>3.19 This is particularly relevant at the present time, which is one of great economic uncertainty, as the UK struggles with negotiations on Brexit. The share prices of housebuilders have been hard hit by Brexit (making it more difficult for them to raise finance for new housing projects) and many have announced that they are putting new projects on hold. Yet recent announcements by opposition parties in the UK suggest that Brexit, least of all a Hard Brexit, may not even happen. The truth is no one knows how Brexit will pan out, yet the HSAP would have us believe that housing developers can accurately predict delivery for up to 9 years ahead! This seems very unlikely, if not impossible. We then have to consider what would happen should the developers simply change their minds if circumstances change. This is not at all unlikely; should the Brexit logjam be suddenly released (for example if an agreement was reached to stay in the EU or at least the customs union) then the circumstances and attractiveness of development at Ashton Park could change dramatically and almost overnight. This would pump 1000 homes into the housing supply far earlier that the HSAP predicts.</p> <p>3.20 Given the questionable basis on which the site allocation proposals are based – namely the actual need for the scale of development proposed – it has to be questioned whether the number and size of sites allocated is actually needed to meet the needs of Trowbridge. [From summary] - The HSAP is based on faulty argument for housing growth That housing is needed to support growth at Trowbridge is not disputed. However the quantum now being proposed is far higher than mentioned in the WCS and this seems to relate to the acceptance of an estimate submitted by an interested party. The assumption that Ashton Park will not</p>				

	be delivered in its entirety during the plan period is a fundamental flaw in the calculations used to determine the level of housing which should be allocated. This is particularly unsound given the economic uncertainty in the UK today.
Attached files (Please see Objective)	4719610
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1689	Consultee Lee Lee Vice Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		North Bradley Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3.21 Failure to fully consider impact of sites proposed on setting of North Bradley As shown in the Landscape Setting Report commissioned for the NDP, a meaningful gap between Trowbridge and North Bradley needs to be maintained in order to preserve the rural character and setting of the village. If this is not done, then it will lead to the inevitable coalescence of Trowbridge and North Bradley, creating an urban sprawl and destroying the village character for which this part of Wiltshire is famous and which the community loves.</p> <p>3.22 While development must take place to provide necessary housing, this should not be at the expense of destroying character and sense of place. If repeated across Wiltshire this would lead to an anonymous sprawl with everywhere becoming simply 'somewhere on the way to somewhere else'. It is the individual character of settlements that residents value and which underpin the county's tourism and leisure industries. Development which destroys this is not sustainable since it involves handing on to our descendants something worse than what we ourselves inherited.</p> <p>3.23 The Landscape Setting Report is given in full as Appendix 2. [in the attached document]</p>				
Attached files (Please see Objective)	4719610				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1690	Consultee Lee Lee Vice Chair North Bradley Parish Council Person ID: 1129933	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					No
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		3.25 Faulty SA Part of the sites selection procedure is based on an SA (Sustainability Appraisal), The Sustainability Objectives for this were: Sustainability Objectives Protect and enhance all biodiversity and geological features and avoid irreversible losses Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings Use and manage water resources in a sustainable manner Improve air quality throughout Wiltshire and minimise all sources of environmental pollution minimise impacts on climate change a) through reducing greenhouse gas emission b) through reducing our vulnerability to future climate change effects. Protect, maintain and enhance the historic environment. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwellings sizes, types and tenures Reduce poverty and deprivation and promote more inclusive and self-contained communities Reduce the need to travel and promote more sustainable transport choices Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local business and a changing workforce Objective 7 should have enabled the plan makers to determine that two of the sites they proposed were harmful to the setting of North Bradley. However, in Section 7.10.74 of the SA itself (regarding Land Off A363 at WHBP) we find no mention of the impact on the setting of North Bradley at all, except for a statement that: 'The site is situated to the immediate east of North Bradley village and west of the White Horse Business Park. The land comprises a series of agricultural fields / informal open space and, as such, would not maximise the use of previously developed land'. The score given for this site against Sustainability Objective 7 records only minor adverse effects on landscape. This completely ignores the sensitivity of the area in landscape setting terms as established by WCS paragraph 5.150, to which it fails to refer, and is clearly wrong in terms of actual impact as is proven by the Landscape Setting Report commissioned for the NDP. A similar error is made for the Southwick Court site. That the SA could have made such fundamental mistakes in scoring brings its entire credibility into question.			

Attached files (Please see Objective)	4719610
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1691	Consultee Lee Lee Vice Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		North Bradley Parish Council Person ID: 1129933		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3.30 Impact on Biodiversity Community engagement revealed that local people care about local wildlife. The SA however concludes that the impact of the Site off A363 at White Horse Business Park would not have a significant effect on Bechstein's Bat. However this seems like an error. Bechstein's Bat is rare and any impact on them must be regarded as serious. The NDP group will be conducting more local research into this issue, including a possible general biodiversity survey.				
Attached files (Please see Objective)	4719610				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1692	Consultee Lee Lee Vice Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		North Bradley Parish Council Person ID: 1129933		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Elm Grove Farm: This site could deliver 200 homes. It is well located, being surrounded by development on 3 sides and is located to the north of the 363 (In landscape terms, as indicated in the North Bradley Landscape Setting Report, this site could be accommodated without significant negative effects on the setting of North Bradley or to biodiversity in the area. It is therefore supported, subject to landscaping conditions in the NDP). The Parish Council SUPPORTS the site at Elm Grove Farm, in order to deliver necessary housing for Trowbridge, but requests that the sites off the A363 at White Horse Business Park, and that at Southwick Court be removed in order to protect the landscape setting of North Bradley, local biodiversity and the reputation of neighbourhood planning in Wiltshire. Their selection is considered to be unsound for the reasons given.</p>				
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Comment ID:	1693	Consultee Lee Lee Vice Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		North Bradley Parish Council Person ID: 1129933		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Southwick Court (180 houses) and Land off the A363 at White Horse Business Park (150 houses) conflict directly with the biodiversity and landscape setting aims of the North Bradley NDP (for Policy 1 of the NDP – see Appendix 3 to this response). This is clearly demonstrated in the Landscape Setting Report given as Appendix 2 [in attached document]. Biodiversity The fields around North Bradley provide a home for many creatures well known to local residents, including bats, mice, birds, rabbits, badgers, deer and foxes. The impact on biodiversity seems to have been underestimated and the NDP will be gathering more evidence on this issue.				
Attached files (Please see Objective)	4719610				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1694	Consultee Lee Lee Vice Chair North Bradley Parish Council Person ID: 1129933	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.2				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3.29 Conflict with WCS Policy 51 Landscape The two sites not included in the NDP (Land off A363 at White Horse Business Park and Southwick Court) also conflict with Wiltshire Core Strategy policy 51 (Landscape). This states: 'Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures.'</p> <p>The proposal of these sites also make the invitation contained within the following part of Paragraph 5. 150 of the WCS very hard to carry through: 'It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.'</p> <p>4.0 There is no desire on the part of the NDP team to have any conflict between the emerging HSAP and the NDP. The Parish Council accepts the need to contribute towards housing need to Trowbridge. However, it does not agree with the quantum proposed nor the locations of all of the proposed sites. Dialogue is sought with the LPA to discuss revisions which will enable a suitable landscape setting area to be retained, while contributing towards local housing need. This is permitted by planning Practice Guidance, which says: A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning authority why it considers the Local Plan allocations no longer appropriate. In rural areas, all settlements can play a role in delivering sustainable development.'</p> <p>Paragraph: 044 AD: 41-044-20160519</p> <p>4.1 The proposed Landscape Setting Policy for the NDP, based on the evidence of the Landscape Setting Report is given as Appendix 1. 4.2 It should be possible to accommodate the growth actually needed for Trowbridge with the desirability of preserving the character and setting of North Bradley, and to this end the NDP accepts one of the sites proposed, that at Elm Grove Farm (200 new homes), but has to reject the others because they conflict with the professional advice obtained by way of landscape appraisal and also with the wishes of the community. It is requested that these sites are withdrawn in order to resolve the conflict between the HSAP and NDP. Land off the A363 at White Horse Business Park (150 houses) conflict directly with the biodiversity and landscape setting aims of the North Bradley NDP (for Policy 1 of the NDP – see Appendix 3 to this response [in attached document]). This is clearly demonstrated in the Landscape Setting Report given as Appendix 2 [in attached document].</p>				

Attached files (Please see Objective)	4719610
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1695	Consultee Lee Lee Vice Chair North Bradley Parish Council Person ID: 1129933	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		No	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3.29 Conflict with WCS Policy 51 Landscape The two sites not included in the NDP (Land off A363 at White Horse Business Park and Southwick Court) also conflict with Wiltshire Core Strategy policy 51 (Landscape). This states: 'Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures.'</p> <p>The proposal of these sites also make the invitation contained within the following part of Paragraph 5. 150 of the WCS very hard to carry through: 'It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning.'</p> <p>4.0 There is no desire on the part of the NDP team to have any conflict between the emerging HSAP and the NDP. The Parish Council accepts the need to contribute towards housing need to Trowbridge. However, it does not agree with the quantum proposed nor the locations of all of the proposed sites. Dialogue is sought with the LPA to discuss revisions which will enable a suitable landscape setting area to be retained, while contributing towards local housing need. This is permitted by planning Practice Guidance, which says: A neighbourhood plan can propose allocating alternative sites to those in a Local Plan, but a qualifying body should discuss with the local planning authority why it considers the Local Plan allocations no longer appropriate. In rural areas, all settlements can play a role in delivering sustainable development.'</p> <p>Paragraph: 044 AD: 41-044-20160519</p> <p>4.1 The proposed Landscape Setting Policy for the NDP, based on the evidence of the Landscape Setting Report is given as Appendix 1. 4.2 It should be possible to accommodate the growth actually needed for Trowbridge with the desirability of preserving the character and setting of North Bradley, and to this end the NDP accepts one of the sites proposed, that at Elm Grove Farm (200 new homes), but has to reject the others because they conflict with the professional advice obtained by way of landscape appraisal and also with the wishes of the community. It is requested that these sites are withdrawn in order to resolve the conflict between the HSAP and NDP. Land off the A363 at White Horse Business Park (150 houses) conflict directly with the biodiversity and landscape setting aims of the North Bradley NDP (for Policy 1 of the NDP – see Appendix 3 to this response [in attached document]). This is clearly demonstrated in the Landscape Setting Report given as Appendix 2 [in attached document].</p>				

Attached files (Please see Objective)	4719610
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1696	Consultee Mrs P E Clarkson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138653		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sites 256 / 292			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Sites 256 / 292 should be considered for housing.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1697	Consultee Ms Shelley Parker Town Clerk Marlborough Town Council Person ID: 820230	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.7				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Site Allocations Plan: Marlborough Town Council Marlborough Town Council's Planning Committee met on Monday, 18th September and resolved to make a corporate response on the above consultation. An extract from the minutes is as follows: WILTSHIRE COUNCIL SITE ALLOCATION CONSULTATION Members noted a report by the Town Clerk and considered a corporate response. The Marlborough Area Neighbourhood Plan Steering Group had also considered this document. The Town Mayor's proposed comments were agreed to be included in the Town Council's response: "Marlborough Town Council recognises that the settlement boundary will have to be adjusted, in the coming years, to include new housing developments and additional amenities. This will include new housing like the Salisbury Road development on Crown Estates land, a new cemetery because the current one is nearly full, and a new school site for Preshute School which is in an unsuitable building with temporary classrooms outside. The settlement boundary will also be reviewed as part of the Marlborough Area Neighbourhood Planning process." RESOLVED: to delegate to the Town Clerk to send a corporate response to Wiltshire Council incorporating the Town Mayor's comments and the relevant points made by the Marlborough Area Neighbourhood Plan Steering Group. The following link the above comments to the Plan and other supporting documents to the consultation: Wiltshire Housing Site Allocations Plan - Chapter 6, page 71 - Settlement Boundary Review - Appendix 10, page 71 - Amended Settlement Boundary Map - Marlborough Topic Paper 1, Settlement Boundary Review Methodology - Chapter 7.31, page 22 Marlborough Town Council recognises that the settlement boundary will have to be adjusted in the coming years to include new housing developments and additional amenities. This will include new housing like the Salisbury Road development on Crown Estates land, a new cemetery because the current one is nearly full and a new school site for Preshute School which is in an unsuitable building with temporary classrooms outside. The settlement boundary will also be reviewed as part of the Marlborough Area Neighbourhood Planning process. (The Neighbourhood Plan is not yet submitted so Chapter 6.7 of the Pre-submission draft plan is relevant to this) Community Area Topic Paper - Marlborough Settlement Strategy para. 2.3 Table 2.1 Appendix 10, page 71 - Amended Settlement Boundary Map - Marlborough Manton is named as a small village but, is, in fact, part of Marlborough through boundary changes made in 1934. It is not clear if the settlement boundary map should include Manton as part of the town. It currently does not.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	1698	Consultee Ms Shelley Parker Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Marlborough Town Council Person ID: 820230		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Marlborough CATP			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Community Area Topic Paper - Marlborough Issues and considerations, para 2.5 The points about infrastructure requirements set out in this paragraph should not be overlooked or unduly delayed. In 2017, Preshute School is having to replace temporary buildings with more up to date ones to meet demand. Reception classes at the new Marlborough St Mary's School are almost at capacity and development (planning permission granted 13.9.17) at the strategic site at Salisbury Road (168 dwellings) will put further strain on capacity. At 5.78 in the WCS it states that...'There is a aspiration to merge the existing infant and junior schools in the town although extra capacity should be provided to cater for the long term needs of the town.'</p> <p>General Comment - On housing, Wiltshire Council documents deal with numbers only which doesn't give a true reflection of the needs of the community and do not address the proper mix of housing needed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1699	Consultee Ed Barron Person ID: 1129967	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to lodge my objection to the Ridgeway Farm site allocation (consultation closes 22 September 2017). As a resident of Crudwell village, I feel that an addition of 40 new houses (representing a 20% increase in dwellings in the village) is far too demanding on the fragile infrastructure of our village. I welcome the chance to set out my views and to participate in a fair consultation process.</p> <p>The main points of my objection are listed below, in no particular order:</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell.</p> <p>A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p> <p>Policy 1 of Wiltshire’s Core Strategy states that “Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.” but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met.</p> <p>Crudwell is not anti-development; it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan, not via the whims of local landowner wishing to make a profit.</p> <p>Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development.</p> <p>Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.</p> <p>Crudwell Primary School is already greatly over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of</p>				

	<p>encroaching into playing fields. The school's ability to expand is not guaranteed and the governors and teachers have already expressed concern and noted their inability to expand in the short term.</p> <p>There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1700	Consultee Chairman of Marlborough Area NP Chairman	Agent Shelley Parker Town Clerk	Do you consider the draft WHSAP is legally compliant?	
		Marlborough Neighbourhood Plan	Marlborough Town Council	Do you consider the draft WHSAP is sound?	
		Person ID: 1129975	Person ID: 1129974		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Site Allocations Plan - Marlborough Area Neighbourhood Plan The Marlborough Area Neighbourhood Plan Steering Group has asked that the following comments be submitted to the above consultation. Wiltshire Housing Site Allocations Plan - Appendix 10, page 71 - Amended Settlement Boundary Map - Marlborough Marlborough Area Neighbourhood Plan Town comments that Manton is named as a small village but, is, in fact, part of Marlborough through boundary changes made in 1934. It is not clear if the settlement boundary map should include Manton as part of the town. It currently does not.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1701	Consultee Chairman of Marlborough Area NP Chairman	Agent Shelley Parker Town Clerk	Do you consider the draft WHSAP is legally compliant?	
		Marlborough Neighbourhood Plan	Marlborough Town Council	Do you consider the draft WHSAP is sound?	
		Person ID: 1129975	Person ID: 1129974		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Marlborough CATP			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Community Area Topic Paper - Marlborough Settlement Strategy para. 2.3 Table 2.1 Mildenhall is not named as either a large or small village in this table. It is a village of 477 population (2011 Census). It is not mentioned anywhere in the WCS either. It would be good to know the reasoning behind this as it's one of the 4 parishes working together towards the Marlborough Area Neighbourhood Plan.</p> <p>Community Area Topic Paper - Marlborough Issues and considerations, para 2.5 Wiltshire Council should not lose sight of the points about infrastructure requirements set out in this paragraph.</p> <p>General Comment - On housing, Wiltshire Council documents deal with numbers only which doesn't give a true reflection of the needs of the community and do not address the proper mix of housing needed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1702	Consultee Mr Glen Jones	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125649		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have read the Atkins Report entitled Wiltshire Housing Site Allocations Plan: Sustainability Appraisal. Insufficient importance and weighting is given to the adverse impact that any sizeable development will have on the capacity of the road network in the Harnham area. As a local resident I cannot support any suggestion of a development of this significant size in the local area. On this basis the Allocations Plan has not been positively prepared and is not effective. The existing road network across Harnham is already overloaded at peak times in the day. The roads are in a very poor state of repair (Old Harnham Road towards The Rose and Crown) and excessive transport is already using the historic old bridge on St Nicholas Road. Whilst reference is made to the Salisbury Transport Strategy and the need for this to take account of future developments no reference is made to the existing problems that are already being encountered on a day-to-day basis with the existing road network. Removal of any large scale allocations such as H3.1 due to an already overloaded road infrastructure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1703	Consultee Skip Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130026		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Ridgeway Farm, Crudwell, allocation of site for 40 houses</p> <p>As someone whose house has been flooded twice in the 15 years I have been living here I am writing to express my deep concern over the inclusion of a proposal for 40 houses at the above site in Wiltshire Council's Draft Site Allocation Plan.</p> <p>Residents in the vicinity of the Swillbrook stream have already been told by Wessex Water and the Environment Agency that while it is recognised that the present infrastructure (inadequate drains, sewers, pumping station, low bridge etc) cannot cope with the extremes of rainfall experienced in the last 15 years, and likely to recur with the same frequency in future years, there is simply not enough money to put matters right given that only 38 houses have been affected. The figure of 38 households might seem insignificant to these authorities but I am sure you recognise that to the individual householders involved it is of considerable significance and we all of us live in fear every time there is heavy rainfall that we will be flooded once again, with the huge amount of distress, disruption and expense that results.</p> <p>The Ridgeway Farm site is land that eventually drains into the Swillbrook and the proposed houses would no doubt share the present sewage and storm drainage systems. The area of land covered by the buildings themselves (houses and garages) and the roads serving them would be substantial, greatly reducing the ability of the land to soak up rainfall, increasing run-off and exacerbating what is already an unacceptable state of affairs for existing residents. From the number of meetings I have attended in recent months I am left with the impression that the council believes there is no alternative to the Ridgeway Farm site and that, as a designated Large Village, Crudwell has to accept its share of the county's housing allocation. If this turns out to be the case and the site is approved by the inspector I would urge the council as strongly as I am able not to approve any subsequent planning application for any further development on the Ridgeway Farm site without a condition that comprehensive flood prevention measures have to be put in place before any development begins.</p> <p>This should apply even if several applications are submitted over a period of years, each for a small number of houses on the site, in the crafty way developers have (which I believe is dishonest) of phasing the development to avoid having to pay for "planning gain".</p> <p>I would be most grateful if a copy of this letter is included in the package of documents submitted to the inspector of the Draft Site Allocation Plan in order that he is made aware of the enormous suffering that would almost certainly result if Crudwell residents were once again flooded simply to satisfy the bottom line of development companies and an arbitrary figure for new housing in the county demanded by the government.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1704	Consultee Colerne Industrial Estates Person ID: 404631	Agent Mr Giles Brockbank Director Hunter Page Planning Ltd Person ID: 863491	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site with which this representation refers to is part of the former Colerne Airfield which is identified on the attached site location plan. Colerne is identified as a large village by Policy CP1 of the Wiltshire Core Strategy. This is a settlement with a limited range of employment, services and facilities. The policy further states that development at large villages will be limited to that needed to help meet the housing needs of settlement and to improve employment opportunities, services and facilities. In addition, policy CP37 allows for the redevelopment of redundant MoD sites.</p> <p>It is recognised within the draft Allocations Plan that the Corsham Community Area has a number of constraints including AONB and Green Belt. However, because there is no identified residual requirement, no sites in the Community Area have been identified beyond Stage 1. The view that no sites need to be allocated within the Corsham Community Area because there is no residual requirement is too simplistic. Within Colerne there is no Neighbourhood Plan Group which provides an alternative method of allocating sites and the settlement boundaries have been drawn tightly around the built form, which provides limited opportunities for infill development.</p> <p>Colerne Airfield currently has permission for B8 (Storage and Distribution) and has previously had permission for a number of live/work units and residential (refs: N/11/03148/FUL and N/13/01567/FUL). As a result, the principle of residential development in this location has previously been considered acceptable.</p> <p>The NPPF is clear a paragraph 47, LPA's should significantly boost the supply of housing. The figures set out in the Local Plan are a minimum target and by not allocating housing within the Corsham Community Area, this means that the area will not be able to meet its housing need. The site at Colerne Airfield has previously had permission for live/work units and residential. It is not a protected employment site, with a number of the existing hangers currently vacant. The recently published Housing White Paper (Fixing our Broken Housing Market) is clear at 1.25 that "brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as flood risk)".</p> <p>Whilst Colerne Airfield is located within the AONB, it is not subject to any other designations. Given the constraints within the Corsham Community Area, this site represents an opportunity for development which would utilise a brownfield site within a large village.</p> <p>My client is promoting the site for a mixed-use development comprising up to 80 residential units together with a Care Home. Paragraph 50 of the NPPF seeks to deliver a wide choice of high quality homes based on current and future demographic trends. The mix of uses proposed will help to meet the increasingly ageing population in the county as acknowledges at 2.14 of the Core Strategy and is also part of the national trend which is acknowledged in the NPPG (ref:2a-021-20160401) and states that LPA's need to provide housing for older people given the projected increase in households aged 65 and over.</p> <p>The NPPF sets out 4 requirements which Local Plans must meet. Taking each in turn, in summary, the Allocations Plans does not meet these for the following reasons.</p> <p>Positively prepared: The Core Strategy supports the redevelopment of former MoD sites and the Housing White Paper also assumes a presumption in favour of the redevelopment of brownfield sites. Development at Colerne Airfield is considered to comply with the general aims of</p>			

	<p>the Core Strategy and given the recent applications on the site, housing can clearly be delivered on this site and there is a willingness to deliver.</p> <p>Justified: No sites within the Corsham Community Area have been allocated on the basis that there is no residual requirement for the rest of the plan period. This simplistic approach does not allow for a detailed assessment of individual sites.</p> <p>Effective: By not allocating sites within Colerne, it is unlikely that the Parish will be able to meet its housing need.</p> <p>Consistent with National Policy: The NPPF seeks to significantly boost the supply of housing (paragraph 47), and also seeks to plan for a mix of housing based on current and identified future trends. By not allocating sites for development in Colerne or with wider Corsham Community Area, the Plan is not seeking to meet existing needs within the settlement, let alone future needs.</p> <p>In order to help Wiltshire meet its current identified housing needs together with future needs, this site should be allocated within the Allocations Plan for a mixed-use development for up to 80 residential units together with a care home.</p>
<p>Attached files (Please see Objective)</p>	<p>4719071</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>It is important that these matters are debated in a public forum.</p>

Comment ID:	1705	Consultee Mrs Sandra Dirks	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126719		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site H3.3 of 100 houses is prone to flooding in the Winter months and is unsuitable for housing in my opinion. These are my views on the development and I hope you will give them due consideration when discussing and making a decision this proposed housing plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1706	Consultee Mrs Sandra Dirks	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126719		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Having read the draft plan for the above I would like to make some comments on the proposed development .</p> <p>I appreciate that there is a housing shortage but I am very concerned about the size and the number of houses in this proposed development. I do not think the road infrastructure along the Netherhampton and Harnham areas are suitable for such a large development. The increased amount of cars will lead to major traffic congestion not only in the immediate area but in the city centre and surrounding roads.</p> <p>I own a property on the Constable Park Estate. I remember when the previous proposed development of 350 houses on this site was abandoned due to poor road infrastructure and traffic concerns. The road network has not changed since then, which means this larger 840 house plan will cause complete chaos without major improvement to the road structure all around the Salisbury area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1707	Consultee Mr Michael Bromley Gardner Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Hankerton Parish Council Person ID: 391297		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Hankerton Parish Council is seriously concerned about the allocation of 50 houses at Ridgeway Farm in Crudwell. The sewage from Crudwell travels through Hankerton en route to Charlton and onward. Over recent years there have been too many cases of raw sewage leakage in Hankerton after heavy rain, including in the Hankerton Bridge pumping station area and upstream of the pumping station, and there are smells emanating from the Hankerton Bridge pumping station. Wessex Water are currently working on improving the sewers in Hankerton village itself but this doesn't help the pumping station nor the upstream area which already floods after heavy rain.</p> <p>We note that the 50 houses (40 on top of the existing-planned 10) constitute almost a 20% increase in the number of houses in Crudwell. That's likely to constitute almost a 20% increase in the volume of sewage flowing down through the Hankerton Bridge pumping station and through Hankerton. This is likely to increase the stress on the sewage system in this area and is a major concern for Hankerton.</p> <p>We believe such an increase to be a threat to Hankerton village. Given that we also understand that the allocation of 40 additional houses to Crudwell represents an oversupply in the Malmesbury Community Area of some 100 houses and forms part of a 2200-house oversupply across the wider Housing Market Area (North & West Wiltshire), the Parish Council considers the risk to Hankerton is too great and urges that this allocation of 40 houses be dropped.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1708	Consultee Steamcross Homes	Agent Mr Giles Brockbank Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1128190	Hunter Page Planning Ltd Person ID: 863491	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site which this representation refers to is land at the Forty, Cricklade. This is a settlement with a range of employment, services and facilities. Policy CP1 of the Wiltshire Core Strategy allows for a modest level of growth to support the function of Cricklade as a service centre. Steamcross would like land to the west of the Forty to be included within the development boundary for Cricklade for residential purposes and to facilitate access from Greensquare development to the south and the Forty. A plan of the site is attached for identification purposes. In providing the footpath link, the proposed inclusion of the site within the Neighbourhood Plan will deliver a significant social benefit by creating a safe pedestrian connection between the Greensquare Group's residential scheme and Cricklade Town Centre. Cricklade Town Council has identified the absence of such a pedestrian link as a concern, and has emphasised the benefits of this being delivered. Indeed, emerging Neighbourhood Plan policy TT3 encourages off road routes for cyclist and pedestrians and this site will help to deliver such a route. Paragraph 6 of the NPPF specifies that "The purpose of the planning system is to contribute to the achievement of sustainable development". Subsequently, Paragraph 187 states that "[...] decision takers at every level should seek to approve applications for sustainable development where possible". In terms of the Local Plan, Paragraph 12 notes that a departure from the policies of an adopted development plan is acceptable where material considerations indicate that it is appropriate. This development site is highly sustainable and the provision of a small number of houses and a footpath connection between from the development land to the south and the Forty will enhance the social and environmental benefits that could be delivered by development on the site in question. In order to help Wiltshire meets its current identified housing needs together with future needs, this site should be allocated within the Allocations Plan for residential development.</p>				
Attached files (Please see Objective)	4719139				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is important that these matters are debated in a public forum.				

Comment ID:	1709	Consultee Marina Dalton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130070		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I'd like to raise my concern/objection to the proposal of building 740 houses on Netherhampton Rd. How many cars will come from this development, causing more chaos on Netherhampton Rd and Harnham Rd. I travel each day here on my way to work and It's bad enough now. Adding more than 700 cars to the road through Harnham is going to cause mayhem. The recent roadworks on the bridge has proved this, with queues right back to Wellworthy Drive.</p> <p>I'd like to object on this matter. Just how is the council going to sort this? It can't, as nothing can be done to the road through Harnham, without knocking down many houses.</p> <p>Please don't ruin our roads any more.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1710	Consultee Nigel Kelly	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130083		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to protest against the plans of building an extra 40 houses on top of the current 10 houses being built, increasing the size of our village by nearly 20%!</p> <p>Although I recognise the need for extra houses, especially affordable houses, I think that expanding the village too quickly would overwhelm the current facilities. The increase in pedestrians in Tetbury lane without a proper continuous footpath is of great concern. I am a trustee of the village hall in tetbury lane and know how busy the road can be.</p> <p>It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1711	Consultee Mrs Fern Joyce Person ID: 704825	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Inadequate notification I am a resident living adjacent to site 321. I received no formal written notification from Wiltshire Council about the consultation process relating to this site. On 17/09/17 I spoke to other residents of the houses bordering the site. At this late date, there were still several households who were completely unaware of the WHSAP or the proposal to build 40 houses on this site. The village as a whole has remained largely unaware, until relatively recently, of this potentially significant village development. The Parish Council was notified subsequent to its July meeting. As no Parish Council meeting takes place in August due to the summer recess, councillors were unable to call a formal meeting for villagers. They were also left with very little time in which to examine in detail the lengthy and complex documents relating to the proposed development. A consultation period timed to take place when Parish councillors and villagers are taking annual leave can only be designed to suit the promoters of this development. The failure to allow adequate time for publicity, discussion and detailed consideration of plans which could have a significant impact on the village make the WHSAP proposal unsound.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1712	Consultee Mrs Katrina Dixon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126717		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to express my concerns about the proposed housing development on Netherhampton Road, Salisbury, Site S1028 and S1027. My objection is to the large number of houses proposed and the pressures this will put upon the suburb of Harnham. The additional houses will obviously cause an increase in the amount of traffic on the roads to and through Harnham. These roads are often gridlocked with the current volume of traffic. In fact one of the reasons a proposed development site at Britford Lane was excluded from the long-term housing plans by Wiltshire Council planners, was that the main road leading to it was unable to take additional traffic. This is the same road that would be used by people travelling from the City Centre or London Road/Southampton Road area of Salisbury to the proposed site at Netherhampton Road (ie unable to take additional traffic). Cars will have to be the transport of choice for any residents at Netherhampton Road as it is not on a bus route. The local bus company has in fact reduced the number of buses to Harnham over the last few years and the buses are overcrowded at times with elderly passengers having to stand.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1713	Consultee Mrs Katrina Dixon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126717		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to express my concerns about the proposed housing development on Netherhampton Road, Salisbury, Site S1028 and S1027. My objection is to the large number of houses proposed and the pressures this will put upon the suburb of Harnham. Harnham Infant and Junior schools are almost at capacity with many children travelling in from other areas of the city (and beyond). Although there is a possibility that a new school could be built at the Netherhampton Road site this is not usually the first building to be constructed. Therefore any children moving into the first phase of the site would need to be allocated a place at a school, the nearest being Harnham Infant and Junior schools. Parents may also wish to send their children to Harnham schools even after the construction of a school in Netherhampton as it is an established school with a good reputation. This could put pressure on the schools to increase the class sizes. Of course parents can choose which school they would like their children to attend, leading to the possibility of children from the other side of Salisbury and outlying villages enrolling at Netherhampton. This would then add to the increased amount of traffic through Harnham, 39 weeks of the year. This proposed development of 740 houses will add to the pressures on the local NHS hospital. Salisbury has a very good hospital but it is often full to capacity. Salisbury and the surrounding villages have had a large number of houses built in the last 10-15 years and this continues with housing being constructed for the Armed Forces on Salisbury Plain. More housing does of course mean more people and more patients requiring hospital care.</p> <p>I trust you will take my concerns into account when a final decision is made.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1714	Consultee Mrs Katrina Dixon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126717		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to express my concerns about the proposed housing development on Netherhampton Road, Salisbury, Site S1028 and S1027. My objection is to the large number of houses proposed and the pressures this will put upon the suburb of Harnham. Harnham Infant and Junior schools are almost at capacity with many children travelling in from other areas of the city (and beyond). Although there is a possibility that a new school could be built at the Netherhampton Road site this is not usually the first building to be constructed. Therefore any children moving into the first phase of the site would need to be allocated a place at a school, the nearest being Harnham Infant and Junior schools. Parents may also wish to send their children to Harnham schools even after the construction of a school in Netherhampton as it is an established school with a good reputation. This could put pressure on the schools to increase the class sizes. Of course parents can choose which school they would like their children to attend, leading to the possibility of children from the other side of Salisbury and outlying villages enrolling at Netherhampton. This would then add to the increased amount of traffic through Harnham, 39 weeks of the year. This proposed development of 740 houses will add to the pressures on the local NHS hospital. Salisbury has a very good hospital but it is often full to capacity. Salisbury and the surrounding villages have had a large number of houses built in the last 10-15 years and this continues with housing being constructed for the Armed Forces on Salisbury Plain. More housing does of course mean more people and more patients requiring hospital care.</p> <p>I trust you will take my concerns into account when a final decision is made.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1715	Consultee Mrs Katrina Dixon	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126717	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to express my concerns about the proposed housing development on Netherhampton Road, Salisbury, Site S1028 and S1027. My objection is to the large number of houses proposed and the pressures this will put upon the suburb of Harnham. The additional houses will obviously cause an increase in the amount of traffic on the roads to and through Harnham. These roads are often gridlocked with the current volume of traffic. In fact one of the reasons a proposed development site at Britford Lane was excluded from the long-term housing plans by Wiltshire Council planners, was that the main road leading to it was unable to take additional traffic. This is the same road that would be used by people travelling from the City Centre or London Road/Southampton Road area of Salisbury to the proposed site at Netherhampton Road (ie unable to take additional traffic). Cars will have to be the transport of choice for any residents at Netherhampton Road as it is not on a bus route. The local bus company has in fact reduced the number of buses to Harnham over the last few years and the buses are overcrowded at times with elderly passengers having to stand.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1716	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	40 houses for this site is not a sustainable development and would lead to parking problems. Parking on the Manor Fields estate is a significant problem, and parking on site 321 would be unachievable, leading to overspill onto the B3098, causing traffic hazards.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1717	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The density of housing proposed for site 321 (40 houses on 12092m2) greatly exceeds that of the existing estate of Manor Fields (66 houses on 26057m2).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1718	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Dismissal of alternative available land for building. Appendix G, Assessment Criteria from stage 4a of the site selection process states on page 57: ‘...there may be further limited windfall development in the form of infill within the settlement boundary, but this would be unlikely to generate significant benefits for the village.’ Other sites have been dismissed, whereas in fact land is available (owned by the Parish Council) that would enable the village to fulfil the needs of the Parish Housing Needs Survey of 2014.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1719	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The WHSAP contradicts the objectives of the Wiltshire Core Strategy</p> <p>The Wiltshire Core Strategy (legally adopted in Jan 2015) states (page 43) that development in large villages will be ‘limited to help meet the needs of settlements and to improve employment opportunities, services and facilities.’</p> <p>The Wiltshire Core Strategy paragraph 4.8 states: ‘The Spatial Strategy recognises the importance of delivering new jobs and infrastructure alongside future housing delivery.’</p> <p>1) The proposal to build 40 houses far exceeds the needs of the village (as reflected in the Parish’s 2014 Housing Needs survey).</p> <p>2) Other than in the short term (the building of the houses), no employment opportunities are considered in the plan.</p> <p>3) No additional village services or facilities are proposed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1720	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The percentage growth stated in the WHSAP is incorrect and misleading. Appendix E incorrectly states that Bratton has 819 dwellings. The 2011 census identified 512 households, with 1248 residents. Table E1 in Appendix 1 highlights that the village has experienced growth of 26 houses, or 3.2%, in the last 10 years. This figure should actually be 5.1%. The addition of 40 new houses in Bratton will therefore represent a further 7.8% increase, bringing the proposed 15-year growth of the village to 12.9%. This is a significant growth for a village of Bratton's size, increasing strain on services such as the B3098, existing water pressure issues and the local GP surgery.</p> <p>The statement on page 56 of the WHSAP ('..the addition of 40 houses would represent modest growth') is misleading and incorrect.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1721	Consultee Mr Michael Perry Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Bishopstrow Village Meeting		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7; H2.9		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the changes to the settlement boundaries for East of Dene and Boreham/Spurt Mead are not required and are illogical. In the case of the East of the Dene site this will allow developers the opportunity to further speculatively develop beyond the proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1722	Consultee Mr Michael Perry Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Bishopstrow Village Meeting Person ID: 709291		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7; H2.9		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared with other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable. It is noticeable that Warminster now has only 1 doctors' surgery with the closure of the Smallbrook Practice; that the local designated primary school is full, as is Warminster's only secondary school which, furthermore, has no room for expansion on its present site. Laying a financial contribution against a developer cannot conjure these types of service out of thin air and therefore need a deeper understanding of the infra-structure implications and needs as a result of development of the Boreham/Spurt Mead and East of the Dene sites. This argument equally applies to Warminster's employment situation, where most of its employees travel out of Warminster which, with the exception of Salisbury and the army facilities on Salisbury Plain, are accessed by roads across the town from these sites i.e. the A36 west and the A350 north and south.</p> <p>In Bishopstrow we are also deeply concerned by the potential for coalescence into Warminster. Both the sites mentioned here build on or close to Bishopstrow's parish boundary and Conservation Area.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1723	Consultee Mr Michael Perry Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Bishopstrow Village Meeting Person ID: 709291		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7; H2.9		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>An analysis of the maps provided in your consultation documents show the risks of flooding in Bishopstrow due to upstream developments. The development of Boreham/Spurt Mead and East of the Dene will not reduce this risk and in fact has the potential to make the situation worse, as recent flood events have consistently shown.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1724	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Appendix F in the WHSAP contains the assessment criteria from stage 3 of the site selection process (the Sustainability Appraisal). Site 321 scored negatively in 9 out of 12 categories (75%) and yet the conclusion arrived at was: 'Therefore, the overall sustainability benefits of developing the site are considered to be good.'				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1725	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The density of housing proposed is unachievable. Table F4 states that 'the site has a capacity for approximately 32 dwellings, although mitigation could reduce this number.' Paragraph 6.26 and table 6.27 revise the capacity to 40, despite the statement contained within F4. This is therefore both contradictory and unachievable				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1726	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consistent with national policy				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The number of houses proposed is at odds the aims of Wiltshire's Core Strategy Policy for sustainable growth. 40 houses is an unacceptable level of growth for the village of Bratton (please refer to representation 5 for correct percentage). It conflicts with Paragraph 4.7 of the Wiltshire Core Strategy, which states: 'The spatial strategy.....will ensure that development within Wiltshire helps to deliver.....appropriate levels of housing.....If a development proposal does not accord with the Core Strategy it is deemed unsustainable and will not be supported.'				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1727	Consultee Mrs Fern Joyce Person ID: 704825	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Positive scoring on the Sustainability Appraisal Report is open to challenge Of the three categories where the scoring was positive, all are open to challenge. Objective 8: 'To provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.' Every single site contained within Wiltshire Council's Sustainability Appraisal will score positively in this category, therefore making its comparative value of little worth. Objective 11: 'To encourage a vibrant and diversified economy and provide for long-term economic growth.' There are no plans to diversify or add to the existing village amenities. The word 'vibrant' is used imprecisely and in simply making reference to greater numbers of people. Objective 12: 'To ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce.' The proposal is for housing only and not to provide land for employment.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1728	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The WHSAP fails to meet the sustainability measures cited in the Wiltshire Core Strategy Policy</p> <p>The additional residents of the proposed new development of 40 houses will rely on private cars to access employment, secondary schools, and retail and leisure facilities in nearby towns rather than within the village. This therefore contravenes paragraph 4.5 of the Wiltshire Core Strategy: 'The strategy seeks to deliver the most sustainable level of growth, which does not exacerbate commuting, encourages a greater level of self containment and does not negatively impact on Wiltshire's exceptional environmental quality.'</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1729	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704825		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Unwanted settlement outside village boundary which contravenes Wiltshire Core Strategy Objectives The proposed site allocation in Paragraph H2.14 is outside the revised settlement boundary for Bratton as shown on document WHSA PSCONSO1A. It would be detrimental to the village of Bratton to develop outside the settlement boundary. Paragraph 4.15 of the Wiltshire Core Strategy states: 'At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.'				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1730	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The WSHAP contravenes the Wiltshire Core Strategy Policy</p> <p>Both the initial proposed number of houses (32) and the revised number of houses (40) exceed the number recommended for Large Villages within the Wiltshire Core Strategy. Paragraph 4.15 of the Wiltshire Core Strategy states: 'At the settlements identified as villages, a limited level of development will be supported in order to help retain the vitality of these communities. At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.'</p> <p>Small housing sites are later defined as 'sites involving fewer than 10 dwellings (i.e. not a major application).' A proposal of 40 houses is far and beyond that suggested by the core strategy, thus rendering the WSHAP unsound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1731	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Wiltshire Core Strategy has been ignored, leading to invalid decisions taken by Bratton Parish Council The response from Bratton Parish Council to the Informal Consultation of Large Villages in 2015 led to the Parish Council viewing site 321 as having potential for development in the future. As this response was made in the light of paragraph 4.15 of the Wiltshire Core Strategy, it was anticipated that this would be a development of fewer than 10 houses. The WHSAP has changed this to a development of 40 houses. This completely invalidates the previous positive response of the Parish Council.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1732	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704825		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Discrepancies between the Wiltshire Core Strategy and the WHSAP have undermined the autonomy of the Parish Council</p> <p>Paragraph 4.7 of the Wiltshire Core Strategy refers to 'appropriate levels' of development within Villages.</p> <p>Paragraph 4.15 of the Wiltshire Core Strategy represents Village development as 'limited', 'taking the form of small housing' and 'within the settlement boundaries.'</p> <p>The Parish Council did not draw up a Neighbourhood Plan because it did not feel the necessity to do so.</p> <p>Without a Neighbourhood Plan, the autonomy of the Parish Council is under threat and the village cannot protect itself from unwanted development. This shift away from the legally adopted objectives of the Wiltshire Core Strategy (40 houses does not represent an appropriate or limited level of development) has placed the village of Bratton in an insidious and vulnerable position and must surely be illegal.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1733	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The ordnance survey map of Bratton used in the WHSAP omits Public Right of Way BRAT25 Right of Way BRAT24 is shown, but Right of Way BRAT25 is omitted. The map therefore misrepresents site 321.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1734	Consultee Ms Linda Walker Landowner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		GS and M Payton Trust Person ID: 1104618		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are the owners of Site H1:2 (land at Underhill Nursery, Market Lavington) There are two land owners and we are working together to bring the land forward We can confirm that it is available for development. We are actively working with developers to bring the site forward. We would like to see all of the original 2055 site included in the allocation. The councils own work has confirmed that the land is suitable and achievable We therefore support the allocation of the land and confirm that our intention will be for its delivery, within the early part of the plan period. "Proposals for Revised Settlement Boundaries" Map included as Appendix A of the Draft Local Plan, does not correctly reflect the boundary of the allocated land H1:2. The map should be amended to reflect the allocation by extending the settlement boundary to include all of the allocated land. We believe the inclusion of all the original 2055 site will provide greater scope for the development of the site including appropriate provision of public green space.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>We or our representatives would value the opportunity to explain why we feel the site would benefit from the inclusion of the whole of the original 2055 site to create a sustainable development that contributes to the environment and the community.</p>				

Comment ID:	1735	Consultee Mr Peter Archer Landowner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Superior Plants Person ID: 1130331		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are the owners of Site H1:2 (land at Underhill Nursery, Market Lavington) There are two land owners and we are working together to bring the land forward We can confirm that it is available for development. We are actively working with developers to bring the site forward. We would like to see all of the original 2055 site included in the allocation. The councils own work has confirmed that the land is suitable and achievable We therefore support the allocation of the land and confirm that our intention will be for its delivery, within the early part of the plan period. "Proposals for Revised Settlement Boundaries" Map included as Appendix A of the Draft Local Plan, does not correctly reflect the boundary of the allocated land H1:2. The map should be amended to reflect the allocation by extending the settlement boundary to include all of the allocated land. We believe the inclusion of all the original 2055 site will provide greater scope for the development of the site including appropriate provision of public green space.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>We or our representatives would value the opportunity to explain why we feel the site would benefit from the inclusion of the whole of the original 2055 site to create a sustainable development that contributes to the environment and the community.</p>				

Comment ID:	1736	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Existing Rights of Way should be protected. The ordnance survey map of Bratton used on page 28 does not show Right of Way BRAT25. There is a danger that this may be omitted or re-routed in order to fit in the proposed housing development. Paragraph 004 Reference ID: 37-004-20140306 from the National Planning Policy framework states: 'Public rights of way form an important component of sustainable transport links and should be protected or enhanced.' Rights of Way BRAT25 and BRAT24 should not be diverted or re-routed to facilitate the building of houses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1737	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site would be vulnerable to flooding and make other dwellings vulnerable Table F4 states that the area is 'at risk from surface water flooding associated with high run-off from hills.' Bratton frequently sees heavy downbursts which leads to flash flooding of roads, fields and property. Currently, site 321 soaks up excessive rainfall and run-off from the hills, but should this area become entirely tarmac, the houses in the Rosenheim Rise vicinity would be particularly vulnerable.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1738	Consultee Mr Laurence Ying	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130390		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing with regards the Wiltshire Council proposal to build a total of 840 new houses in Salisbury. 740 of the proposed new houses will be located on the Netherhampton Road (A3094). The other 100 houses are planned to be south of Woodbury Rise.</p> <p>There is a need for more housing. However the new housing needs to meet the following criteria:-</p> <ul style="list-style-type: none"> the type of housing needed by the community within which it is built. In Salisbury we mainly need affordable, low rent and/or social housing to be built near to local services needed by its residents including local shops, schools and medical services built in locations served by good road and public transport infrastructure built in areas which do not cause major damage to the environment in respect of greatly increased levels of traffic congestion, air and noise pollution <p>The Wiltshire Council proposals for additional new housing in the south of Salisbury fail to meet the criteria I have listed above.</p> <p>Netherhampton Road leads to Harnham Road, New Bridge Road, Bournemouth/Downton and Blandford Roads which are already heavily congested with traffic. The road infrastructure is wholly inadequate for what is potentially an additional 1000 cars in the south and east of Salisbury.</p> <p>the proposed new housing would greatly increase the volume of traffic on all of these roads causing even greater traffic congestion,</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1739	Consultee Mr AT Jeans	Agent Mr Diccon Carpendale Brimble Lea and Partners	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1130378	Person ID: 1122261	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>A number of sites were put forward for inclusion within the reviewed settlement boundary for the large village of Broad Chalke. Our client's sites subject to this representation are SHLAA 3338 and 3339.</p> <p>3338 (land at Newtown) was excluded because a small part of the area was within flood zone 2 therefore failing exclusionary question 5. In all other respects this received positive response to these exclusionary questions. However, the assessment adjudged the site was not developable because the road was not wide enough to accommodate access requirements. Other than the part of the road adjacent to the river (where suitable traffic control measures can be put in place) all of the road frontage is within our client's control and the road can therefore be widened as required. The site can be reduced to exclude the small area of flood zone 2. In such circumstances this site should have not been removed at the initial stages.</p> <p>With respect to site 3339 (land at Knighton Road) the site was assessed positively under the exclusionary questions and recommended to be taken forward for further consideration. However, despite this land being considered appropriate and developable and an assessment being made that it would be unreasonable to remove sites within the AONB (because the whole village is within it) it has subsequently been assessed that all sites put forward at Broad Chalke should be removed from the revised settlement boundaries because there is inadequate capacity at the primary school. The assessment says that the school is not within the Councils control and therefore this lack of certainty means that the sites proposed for inclusion should be removed. As a consequence, none of the sites are being proposed for inclusion within the revised settlement boundary.</p> <p>This approach seems to be remarkably short sighted and if adhered to is likely to prevent further modest growth of the village needed to support the community and local facilities. However, it is noted within the supporting documentation that reference is made to the emerging neighbourhood plan through which sites in our client's ownership may be given further consideration.</p> <p>Whilst it is understood that settlement boundaries are being reviewed at this point in time, it would be logical for the review to take place coincident with the making of the neighbourhood plan to ensure that both neighbourhood plan and core strategy settlement boundary plans are the same.</p> <p>The settlement boundary review should coincide with the "making" of the Broad Chalke neighbourhood plan to ensure consistency between neighbourhood plan documentation and core strategy (settlement boundary) information.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1740	Consultee Mr Laurence Ying	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130390		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing with regards the Wiltshire Council proposal to build a total of 840 new houses in Salisbury. 740 of the proposed new houses will be located on the Netherhampton Road (A3094). The other 100 houses are planned to be south of Woodbury Rise.</p> <p>There is a need for more housing. However the new housing needs to meet the following criteria:-</p> <ul style="list-style-type: none"> the type of housing needed by the community within which it is built. In Salisbury we mainly need affordable, low rent and/or social housing to be built near to local services needed by its residents including local shops, schools and medical services built in locations served by good road and public transport infrastructure built in areas which do not cause major damage to the environment in respect of greatly increased levels of traffic congestion, air and noise pollution <p>The Wiltshire Council proposals for additional new housing in the south of Salisbury fail to meet the criteria I have listed above.</p> <p>Netherhampton Road leads to Harnham Road, New Bridge Road, Bournemouth/Downton and Blandford Roads which are already heavily congested with traffic. The road infrastructure is wholly inadequate for what is potentially an additional 1000 cars in the south and east of Salisbury.</p> <p>the proposed new housing would greatly increase the volume of traffic on all of these roads causing even greater traffic congestion, air and noise pollution</p> <p>Salisbury needs a new ring road which completing encircles the city which enables traffic to avoid coming into what is already heavily congested roads in the city. New housing could then be built in locations with easy access to the new ring road.</p> <p>Building large numbers of new houses without adequate road infrastructure is short sighted and will cause major issues in the future which cannot be resolved after the housing has been built.</p> <p>Large numbers of new houses are already being built close to Salisbury which will increase traffic congestion in and around Salisbury.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1741	Consultee Mr Laurence Ying	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130390		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing with regards the Wiltshire Council proposal to build a total of 840 new houses in Salisbury. 740 of the proposed new houses will be located on the Netherhampton Road (A3094). The other 100 houses are planned to be south of Woodbury Rise.</p> <p>There is a need for more housing. However the new housing needs to meet the following criteria:- the type of housing needed by the community within which it is built. In Salisbury we mainly need affordable, low rent and/or social housing to be built near to local services needed by its residents including local shops, schools and medical services built in locations served by good road and public transport infrastructure built in areas which do not cause major damage to the environment in respect of greatly increased levels of traffic congestion, air and noise pollution</p> <p>The Wiltshire Council proposals for additional new housing in the south of Salisbury fail to meet the criteria I have listed above. there is a plan to build a local primary school but no shops, GP surgery or other community facilities. Children living in the new housing would still have to travel out of the immediate area to go to secondary schools. This would also increase the traffic congestion.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1742	Consultee Mr Laurence Ying	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130390		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing with regards the Wiltshire Council proposal to build a total of 840 new houses in Salisbury. 740 of the proposed new houses will be located on the Netherhampton Road (A3094). The other 100 houses are planned to be south of Woodbury Rise.</p> <p>There is a need for more housing. However the new housing needs to meet the following criteria:-</p> <ul style="list-style-type: none"> the type of housing needed by the community within which it is built. In Salisbury we mainly need affordable, low rent and/or social housing to be built near to local services needed by its residents including local shops, schools and medical services built in locations served by good road and public transport infrastructure built in areas which do not cause major damage to the environment in respect of greatly increased levels of traffic congestion, air and noise pollution <p>The Wiltshire Council proposals for additional new housing in the south of Salisbury fail to meet the criteria I have listed above.</p> <p>the majority of the proposed housing will not be affordable, low rent and/or social housing.</p> <p>the proposed housing will not serve the local community. Instead the proposed housing will attract people from outside the area. Therefore those buying the properties will be commuting to locations outside of Salisbury increasing car movements and traffic congestion.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1743	Consultee Mr Laurence Ying	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130390		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing with regards the Wiltshire Council proposal to build a total of 840 new houses in Salisbury. 740 of the proposed new houses will be located on the Netherhampton Road (A3094). The other 100 houses are planned to be south of Woodbury Rise.</p> <p>There is a need for more housing. However the new housing needs to meet the following criteria:- the type of housing needed by the community within which it is built. In Salisbury we mainly need affordable, low rent and/or social housing to be built near to local services needed by its residents including local shops, schools and medical services built in locations served by good road and public transport infrastructure built in areas which do not cause major damage to the environment in respect of greatly increased levels of traffic congestion, air and noise pollution</p> <p>The Wiltshire Council proposals for additional new housing in the south of Salisbury fail to meet the criteria I have listed above. Netherhampton Road leads to Harnham Road, New Bridge Road, Bournemouth/Downton and Blandford Roads which are already heavily congested with traffic. The road infrastructure is wholly inadequate for what is potentially an additional 1000 cars in the south and east of Salisbury. the proposed new housing would greatly increase the volume of traffic on all of these roads causing even greater traffic congestion, air and noise pollution</p> <p>Salisbury needs a new ring road which completing encircles the city which enables traffic to avoid coming into what is already heavily congested roads in the city. New housing could then be built in locations with easy access to the new ring road. Building large numbers of new houses without adequate road infrastructure is short sighted and will cause major issues in the future which cannot be resolved after the housing has been built. Large numbers of new houses are already being built close to Salisbury which will increase traffic congestion in and around Salisbury.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1744	Consultee Mr Laurence Ying	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130390		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing with regards the Wiltshire Council proposal to build a total of 840 new houses in Salisbury. 740 of the proposed new houses will be located on the Netherhampton Road (A3094). The other 100 houses are planned to be south of Woodbury Rise.</p> <p>There is a need for more housing. However the new housing needs to meet the following criteria:-</p> <ul style="list-style-type: none"> the type of housing needed by the community within which it is built. In Salisbury we mainly need affordable, low rent and/or social housing to be built near to local services needed by its residents including local shops, schools and medical services built in locations served by good road and public transport infrastructure built in areas which do not cause major damage to the environment in respect of greatly increased levels of traffic congestion, air and noise pollution <p>The Wiltshire Council proposals for additional new housing in the south of Salisbury fail to meet the criteria I have listed above.</p> <p>there is a plan to build a local primary school but no shops, GP surgery or other community facilities. Children living in the new housing would still have to travel out of the immediate area to go to secondary schools. This would also increase the traffic congestion.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1745	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The mitigation measures needed to ensure that the development is in keeping with local distinctiveness are unachievable. Table G3 (Historic Environment) states: 'Any development on this site should nonetheless ensure that the significance and setting of the Conservation area and Listed Buildings maintained and local distinctiveness reinforced. This would be possible to mitigate through building type, size, design and layout.' Section 6.7 of the WHSAP, which seeks to increase the number of dwellings from 32 to 40, makes any proposed mitigation measures to maintain local distinctiveness unachievable. Bratton has many individual and unique houses, but the density of housing proposed for site 321 would necessitate smaller, densely packed dwellings, or possibly three-story buildings, to fit in the required number of houses. It is highly unlikely that the development would be in keeping with the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1746	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No detailed survey has been undertaken in regard to wildlife and biodiversity at site 321. Table G3 states that the site is bound at its edges by trees and hedgerow that are considered to be of ecological importance as a wildlife corridor. My property borders the site and this is a correct assessment. Hedgehogs, bats, slowworms, field mice, shrews and slowworms are regular visitors, and there is also a badger's sett in the vicinity. Other visiting wildlife includes foxes, squirrels, and birds such as goldfinches, great-tits, robins, dunnocks, blue-tits, long-tailed tits, chaffinches, collared doves, wood pigeons, redwings and fieldfare (in winter) and (occasionally) gold crests. A large housing development on this site would have a significant impact, especially in the initial stages of construction. No amount of mitigating tree or hedge planting can bring back the wildlife once it has been driven away or destroyed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1747	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site could receive a further development request in the future. Site 321 is only part of a larger area of land with the Land Registry Title WT2932, and may be open to further development in the future. The arbitrary existing western boundary was created in the 1990s after refusal of earlier planning applications.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1748	Consultee mr Ian Ian Humphrey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126760		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Planning permission for development of the site in question has been refused twice before.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1749	Consultee mr Ian Ian Humphrey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126760		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	If it is finally decided by Wiltshire Council that a housing plan is to be imposed upon the village, sites within the existing settlement boundary should be considered, to provide the potential for new homes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1750	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704825		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed housing development of 40 houses does not meet the needs of the village. Paragraph 6.28 states that the development would 'contribute towards identified needs in the most recent Parish Housing Needs Survey.' This is not correct, as it greatly exceeds the numbers identified in the 2014 report, which were as follows: Subsidised rented housing - 2x one bedroom homes /1x two bedroom home /2x three bedroom homes Shared / Low cost home ownership - 2x two bedroom homes / 1x four bedroom home Sheltered housing for older people - None				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1751	Consultee mr Ian Ian Humphrey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126760	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed development of 40 houses on a small area of land represents an unrealistically high building density in Bratton. Residents of several village estates built here some years ago, with significantly lower density housing, experience constant access problems due to a marked increase in vehicle ownership and journeys made. In these circumstances how can Wiltshire Council justify a proposed density increase of nearly 50%?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1752	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704825		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed development threatens tourism and the environment, and is in conflict with the objectives of the Wiltshire Core Strategy In the Wiltshire Core Strategy, paragraph 2.8 outlines the need for 'careful stewardship of our environmental assets so that growth is complementary and does not erode the very qualities that make Wiltshire so attractive in the first place.' Paragraph 3.4 states: 'The potential of tourism should be realised as a major growth sector through capitalising on the quality of the environment and location Wiltshire benefits from.' In considering this sensitive site on the edge of the beautiful village of Bratton, little thought has been given to the vast numbers of people who climb the hills above Bratton to enjoy the wonderful views. A large housing estate, or indeed any additional dwellings, can only be detrimental to the rural views currently enjoyed by so many.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1753	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Development on this site would be a significant visual intrusion into the rural landscape</p> <ol style="list-style-type: none"> 1) It is outside the current village boundary 2) It would have a detrimental visual impact on entering the village. 3) It would have a detrimental visual impact when viewed from the hills above Bratton 4) It is a greenfield site 5) It is within the Salisbury Plain Special Protection Area 6) It has the designation of Special Landscape Area. 7) It borders a conservation area 8) It is an important wildlife corridor <p>Plans to build on this land have been rejected on two previous occasions. The conclusion contained in the WHSAP (Table G4) is incorrect in stating that: 'All potential adverse effects are considered able to be addressed through straightforward mitigation measures.'</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1754	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The WHSAP overlooks previous planning refusal objections</p> <p>Planning permission for development on site 321 has been refused on two previous occasions, with the reasons as follows:</p> <p>The site lies within a Special Landscape Area... (which) seeks to preserve the character and scenic quality of the landscape by generally restricting development to that which is essential to the rural economy.</p> <p>The local planning authority considers that the edge of the existing village is well defined and that the housing development proposed, together with the access road thereto across the field in front, would be a substantial intrusion into the rural landscape, and would therefore be detrimental to the character and scenic quality of the area.</p> <p>The conclusions of the WHSAP report (Table G3) make little reference to the above comments. It seems that Wiltshire County Council is now prepared to overlook these objections in order to meet government targets.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1755	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The impact of development on surrounding dwellings is significant but not mentioned in the Conclusion (Table G4)</p> <p>There would be a major visual impact for houses adjacent and overlooking to the proposed site, and yet any adverse effects are omitted from the overall conclusion (Table G4). This is a misrepresentation of the negative aspects of the development. Houses in Rosenheim Rise would be particularly vulnerable, as their low aspect could mean that bedrooms are overlooked, leading to loss of privacy and lack of sunlight.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1756	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The findings of the WHSAP summary are incorrect and imprecise in regard to traffic</p> <p>The WHSAP states: ‘The B3098 Westbury Road does not appear to be a particularly busy road and the landscape at the western edge has an exposed and remote feel. Overall the site and immediate landscape context is peaceful.’”</p> <p>I would question at what time of day the evaluation was carried out. In the absence of a quantified rushhour traffic study, this qualitative statement regarding how busy the road is meaningless.</p> <p>Residents to the south of the site living along the B3098 often have to wait some considerable time before pulling out of their driveways to exit their properties, and doing so is often a risky and dangerous manoeuvre due to lack of visibility along this stretch of road, with no pavement to act as a ‘buffer’. The additional traffic associated with the building of 40 new homes (at least 80 more cars) would add considerably to the congestion and would have a major adverse impact on road safety. The stretch of road between Bratton and Westbury has a higher than average number of crashes than most areas of the country.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1757	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The WHSAP is incorrect in its findings regarding pressure on local infrastructure. The summary in the draft plan states that the site 'would not significantly add to pressures on local infrastructure, services and facilities.' I do not agree.</p> <p>The development is far enough away from the centre of the village for residents to want to use cars to access village amenities. There is already significant build up of parked cars in the village centre for traffic flow to be a problem. There is particular concern for the safety of children at school pick-up time. Additional traffic from the proposed housing development would only add to the congestion.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1758	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The WHSAP is incorrect in its findings regarding pressure on local infrastructure. The summary in the draft plan states that the site 'would not significantly add to pressures on local infrastructure, services and facilities.' I do not agree.</p> <p>The local doctor's surgery is at capacity and an additional 40 households would increase the strain. Although the WHSAP mentions possible financial mitigation to increase provision, I find it hard to believe that any such provision will occur, as no extra resources have been provided for Westbury following the closure of Warminster GP surgery.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1759	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On 12th September, Bratton Parish Council voted unanimously against the building of 40 houses on the site</p> <p>The reasons stated for the rejection are as follows (taken from meeting minutes):</p> <ul style="list-style-type: none"> That the development site is outside the settlement boundary. That the development would have an adverse effect on the conservation area of the parish, impacting the views from higher ground and the White Horse. That the development would have an adverse impact on local amenity and represented over-development. That the development would have a detrimental impact on already over burdened infrastructure. That there were other potential sites within the existing settlement boundary which needed to be considered which could provide the potential for development to meet local need within the settlement boundary. That the increase in residents would represent an unmanageable increase in traffic and create significant highway issues. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1760	Consultee Nicola Blackmore	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130479		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have lived nearby to Ridgeway Farm Crudwell for the last 23 years and I am concerned about the proposed allocation of an additional 40 dwellings at Ridgeway Farm Crudwell in the site Allocations Plan. Together with the 10 dwellings already being built on this site, I have been told this represents a near 20% increase in dwellings in the village of Crudwell.</p> <p>The Site Allocations Plan notes that housing sites will only be allocated by Wiltshire Council where there is a strategic priority to do so. I understand the Site Allocations Plan forecasts an oversupply of homes of some hundred houses in the Malmesbury Community Area. On this basis, there is no strategic need for a site of this scale in Crudwell.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan to determine the level of local housing needed at Crudwell. I understand the residents of Crudwell would like to determine what local needs for housing exist and how they should be met. Crudwell is not anti-development. I believe the residents would simply wish to plan any growth via the emerging Neighbourhood Plan.</p> <p>Previous proposals for additional housing in Crudwell have led to significant debate. I believe that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community. There should be no unnecessary allocation of one site for a substantial development.</p> <p>I feel there is no substantiated strategic need for further housing allocations in Crudwell. I feel that it should be appropriate that Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1761	Consultee Nicola Blackmore	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130479	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am very concerned about the safety and increased traffic flows that will arise on Tetbury Lane, particularly in the morning and late afternoon. The lane from the entrance of Ridgeway Farm in the direction of Long Newton narrows and bends at places and it is always necessary to drive very slowly and carefully. The lane in the other direction down to the A429 main road and to the school and other facilities in the village is also narrow.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1762	Consultee Nicola Blackmore	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130479	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I recall over 23 years of living in this area that houses in Crudwell several times have experienced severe flooding due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Unless significant investment is made in increasing that drainage capacity additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1763	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>General comments, recommendations, and advice The relevance of this nationally designated Area of Outstanding Natural Beauty to this consultation is set out in Annex A to this response. Annex B lists the organisations that make up the Cranborne Chase AONB Partnership. Clearly a great deal of work has been invested in this Plan, and the Spatial Planning team is to be commended on the openness of the stepwise approach to the consideration of the sites and the thoroughness with which that has been done.</p> <p>This AONB finds that stepwise approach logical and readily understandable. Whilst it is noted that nationally designated landscape assets – the AONBs – are considered in Stage 2 of the assessment and selection process, along with other heritage and wildlife designations, the significance of the nationally important landscapes, and the obligations to conserve and enhance natural beauty, is rather understated. Parts of this AONB are in both the North and West Market Housing Area and the South Market Housing Area. Significant parts of the Warminster, Mere, Amesbury and Southern Wiltshire Community Areas are within this AONB, and the vast majority of both Tisbury and Wilton Community Areas are within this AONB.</p>				
Attached files (Please see Objective)	4719692 / 4719693				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1764	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraph 4.19			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Having read the analysis for the locations within and adjacent to this AONB it seems that although the team members involved have demonstrated an effective understanding of AONB issues, those issues are not explicitly set down in the methodology criteria. I do, therefore, recommend that a modification is made to Table F.2 Stage 3 Sustainability Appraisal objectives by including a 7b category. That could be a refinement similar to the refinement of category 5 which reads as 5a and 5b. My recommendation is that the current category 7 becomes 7a and an additional 7b is added as follows: 7b Conserve and enhance the natural beauty of the landscapes of the nation's Areas of Outstanding Natural Beauty, sustaining and strengthening their sense of place, character, and local distinctiveness. That would provide a clear basis for the way sites within and close to the AONBs have been handled as well as reflecting their national importance.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1765	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst the AONB welcomes the landscape and visual assessment in the final stage analysis, using external consultants, we are very concerned that the site analysis at that stage only appears to consider landscape from relatively close up. Many sites, and their impact on the landscape, are appreciated from the opposite side of a valley or from elevated positions. The final stage landscape and visual assessment should take account of the potential form, scale, and height of the potential development as well as the cumulative landscape and visual effects. This AONB does, therefore, strongly advise that sites should be consistently assessed from wider viewpoints and hence include their impacts on the wider landscape. This is especially important when sites are within an AONB or the setting of an AONB.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1766	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Warminster is within the setting of this AONB. In addition to a number of Small Villages, the Large Villages of Codford, Corsley, Heytesbury, and Sutton Veny are fully or partially within this AONB.</p> <p>Table 2.2 indicates that the developable commitments and indicative residual housing requirement to 2026 for the whole of the community area outside Warminster itself is 50. Amendments are proposed to the settlement boundaries of the Large Villages.</p> <p>It is noted that the proposed allocations in Warminster are outside this AONB but are linked to roads and / or public rights of way that could provide direct access to this AONB. The allocations when developed are, therefore, likely to increase recreational pressures on this AONB and compensation for that should be provided.</p> <p>Over a dozen sites were considered in Codford and this AONB supports the decisions made on those sites. The decisions on sites in Corsley, Heytesbury, and Sutton Veny are also supported.</p> <p>This AONB notes that one allocation is being taken forward in a Large Village outside the AONB.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1767	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster Community Area Settlement Boundaries			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This AONB is not commenting on the proposed settlement boundary amendments.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1768	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Mere abuts this AONB and is the Local Service Centre for 5 Small Villages that are within this AONB. Table 2.2 indicates that the developable commitments and indicative residual housing requirement to 2026 for Mere is 139, and the whole of the community area outside Mere itself is 13. Amendments are proposed to the settlement boundary of Mere. It is noted that the developable commitments in Mere are outside this AONB but are linked to roads and / or public rights of way that could provide direct access to this AONB. The allocations when developed are, therefore, likely to increase recreational pressures on this AONB and compensation for that should be provided. This AONB acknowledges that allocations are not made for Small Villages and that the outstanding requirement of 8 houses is likely to be delivered through windfall.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1769	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.68			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This AONB notes that proposed settlement boundary amendments to Mere do not impact directly on the AONB and therefore is not commenting.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1770	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is only the Nadder Valley element in the extreme south of this community area that is within this AONB. Great Wishford is the only the Large Village, although there are also the Small Villages of Hanging Langford, Steeple Langford, Wylye, within this AONB. Table 2.2 indicates that the developable commitments and indicative residual housing requirement to 2026 for the whole of the community area outside Amesbury, Bulford and Durrington is 166. Amendments are proposed to the settlement boundaries of the Large Villages. The single potential site in Great Wishford has been removed due to the exclusionary criteria, and the AONB supports that decision. Two allocations are made in the north of the community area which leaves a residual housing requirement for the whole area of 76 dwellings.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1771	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.64			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This AONB is not commenting on the proposed settlement boundary amendments to Great Wishford.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1772	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Only the south eastern part of this community area is within this AONB. Downton abuts the AONB and is the Local Service Centre for Coombe Bissett [Large Village] and the Small Villages of Bodenham, Charlton All Saints, Nunton, and Odstock that are wholly or partially within this AONB.</p> <p>Table 2.2 indicates that the developable commitments and indicative residual housing requirement to 2026 for Downton is 105 and for the whole of the community area outside Downton itself is 78.</p> <p>However, as all the requirements can be met from the developable commitments there are no residual requirements, and hence no additional allocations. This AONB supports that decision.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1773	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.72			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This AONB Partnership is very concerned by the proposals to extend the Coombe Bissett settlement boundary northwards into the river flood plain in sectors J6, K6, and K7. The indication that further development could be acceptable in this extension would be most unfortunate. Not only would development in these locations effectively and visually narrow the river valley and restrict views along it where there is a public right of way across the valley but that would also be contrary to the natural form of the valley floor widening as progresses to join the River Avon. This AONB Partnership strongly recommends that the existing settlement boundary is retained in these sectors.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1774	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.70			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This AONB is not commenting on the proposed settlement boundary amendments to Downton.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1775	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Tisbury is the Local Service Centre for the Large Villages of Fovant, Hindon, and Ludwell, together with 11 Small Villages, all of which are within this AONB.</p> <p>Table 2.2 indicates that the developable commitments and indicative residual housing requirement to 2026 for Tisbury is 30 and for the rest of the community area outside Tisbury itself is 160. Amendments are proposed to the settlement boundaries of the Large Villages.</p> <p>This AONB Partnership is aware that considerable work has been done on a Tisbury Neighbourhood Plan which has reached the stage of being a draft document.</p> <p>It is noted that paragraph 5.4, page 8, of the WHSAP – Tisbury refers to a significant brownfield site in Tisbury that should take priority over greenfield sites, and that this is likely to come forward through the neighbourhood planning process. As the residual housing requirement is low it could be delivered through windfall and therefore proposed allocations for housing will not be identified. This AONB supports that approach.</p> <p>For the remainder of the community area it is noted that over a dozen potential sites were ruled out before Stage 2a of the assessment, and a further 9 were removed due to the exclusionary criteria. It is further noted that sites in Hindon and Ludwell did not progress beyond Stage 2b for AONB and school size reasons. This AONB Partnership supports those decisions.</p> <p>The decisions on the 2 sites at Fovant that were considered at Stage 3, and rejected, are also supported.</p> <p>This AONB Partnership recognises the situation set out in paragraph 7.2, page 15, that although there is an indicative residual housing requirement of 149 dwellings for the remainder of the Tisbury Community Area it is not proposed to identify sites for allocation.</p> <p>Dinton and Broad Chalke are close to the boundary of the Tisbury Community area but are actually in the Wilton Community Area. The AONB agrees that Dinton has experienced relatively significant growth, and that potential sites are being investigated via neighbourhood planning processes in Broad Chalke.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1776	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.77			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This AONB welcomes the retention of the settlement boundary along the north-western edges of the River Nadder valley floor, particularly in sectors H9, H8, I8, I7, I6, J6, and K6.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1777	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.77			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is, however, concerned that the inclusion of the brownfield site to the south-west of the railway station within the amended Tisbury settlement boundary could be misunderstood. It recommends that development proposals there should not come forward before the completion of the Neighbourhood Plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1778	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.79			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The AONB welcomes the confirmation of the settlement boundary for Hindon on the north side, H5.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1779	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.78			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The AONB is not commenting on the proposed settlement boundary amendments for Fovant and Ludwell.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1780	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wilton is the Local Service Centre for the Large Villages of Broad Chalke and Dinton. Of the identified 9 Small Villages only Quidhampton, South Newton, and Stoford are outside this AONB, but in its setting, as is the main body of Wilton itself. The housing requirements of Wilton are considered separately in connection with the Salisbury Community Area.</p> <p>Table 2.2 indicates that the developable commitments and indicative residual housing requirement to 2026 for the community area outside Wilton itself is 140.</p> <p>Amendments are proposed to the settlement boundaries of the Local Service Centre, which abuts this AONB, and the 2 Large Villages which are within this AONB.</p> <p>Table 2.2 indicates that the indicative residual housing requirement to 2026 for the community area outside Wilton itself is 129. In the assessment 21 potential sites were removed prior to Stage 2a, and 6 potential sites at Broad Chalke and Dinton were removed due to exclusionary criteria. The remaining 4 sites did not pass the Stage 2b assessment for AONB, education capacity, and high growth reasons. This means no potential sites are being identified for allocation in the Large Villages of the remainder of the Wilton Community Area, although sites are being investigated via the neighbourhood plan processes [see Tisbury above]. The AONB notes the extent and distribution of potential sites shown on the plans in Appendix B, and supports the decisions.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1781	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.81			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In the boundary review, this AONB welcomes the confirmation of the south-western extent of Wilton, particularly at F9, F10, G11 and G12.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1782	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.82			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This AONB is, however, very concerned by the Broad Chalke boundary extension at I8. The majority of the extension is the garden of a dwelling that is an isolated property on the south side of the lane. If the purpose of the boundary review is to regularise land that is built upon then the AONB strongly recommends that the boundary should be drawn tight to the southern side of the dwelling and not along the southern garden boundary.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1783	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.82			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There does not appear to be any explanation why the established Manor Farm and associated buildings are not included within the settlement boundary when those buildings appear to be adjacent to the eastern side of the extended boundary at I7.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1784	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.83			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This AONB welcomes the retention of the Dinton settlement boundary to the areas of housing. However, the AONB is concerned that the development boundary's contained area is beginning to appear rather thin and straggly in the north-west and south-west sectors by the inclusion of extended, and somewhat isolated, developments.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1785	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The housing requirement for the Local Service Centre of Wilton is included with Salisbury rather than the rest of the Wilton Community Area. Table 2.2 indicates that the developable commitments and indicative residual housing requirement to 2026 for Wilton itself to be a maximum of 381. The indicative residual element for both Wilton and Salisbury together is 173. 10 sites in Wilton were removed from further consideration due to exclusionary criteria [Stage 2a], and one was taken forward to the next stage. The site was rejected on school capacity grounds. The analysis found that the potential sites in Salisbury could provide significantly more dwellings than the requirement. The AONB acknowledges that there is, therefore, no requirement to provide additional sites in Wilton.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1786	Consultee Mr Richard Burden Landscape and Planning Advisor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Cranborne Chase and West Wiltshire Downs AONB Person ID: 556113		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1057 (Bulbridge)			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst the AONB supports the outcomes of the analysis we are very concerned that, as set out on page 2 of this response, the site analysis at the final stage, using external consultants, only appears to consider landscape from relatively close up. Many sites, and their impact on the landscape, are appreciated from the opposite side of a valley or from elevated positions. In particular, site s1057 [Bulbridge] which abuts the AONB boundary, and is hence part of the setting, is particularly exposed to view from the public rights of way on the northern side of the valley. The fact that the site is on sloping ground and hence tilted towards the north makes the area even more open to view. The landscape and visual impacts of this site are, therefore, considerably understated. Furthermore, the reliance on hedge and tree screen planting could conflict with the basic landscape character of chalk downland. The AONB does, therefore, strongly advise that if this site comes forward again a more comprehensive and wide ranging landscape and visual impact assessment is carried out.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1787	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Sustainability Appraisal Report for Westbury Area describes the site as: 'A gently sloping pastoral field on the western edge of Bratton.' This field (then unfenced) and a large tract of agricultural land to its west were used to grow crops, including wheat, when I first moved to the village in 1984. During the 1990s a fence line was added and the field was cleared to facilitate two housing applications (both rejected). In the intervening years it has been used for grazing animals (sheep and cows) or left unused. The field can nevertheless still be classed as BMV and should therefore not be used as a site for housing development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1788	Consultee Mr Duncan and Hayley Turp	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The proposal does not take into consideration any of the concerns raised by the council or local residents. The size of the village has been grossly overestimated by the council - The data published and analysed by Wiltshire Council is not correct. According to data collected in the 2011 Census, Bratton actually contains 512 homes not 819, 307 fewer than stated in the Site Allocation Plan.</p> <p>There has been no informing of residents about this consultation process or the intention to develop the land.</p> <p>The proposal does not take into consideration any of the concerns raised by the council or local residents. The size of the village has been grossly overestimated by the council - The data published and analysed by Wiltshire Council is not correct. According to data collected in the 2011 Census, Bratton actually contains 512 homes not 819, 307 fewer than stated in the Site Allocation Plan.</p> <p>There has been no informing of residents about this consultation process or the intention to develop the land.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1789	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Bratton is being used to fulfil the indicative remaining housing requirement of WCC, rather than meeting the needs of the village. Table G3 states: 'The level of development on this site (approximately 40 dwellings) is positive in terms of making a substantial contribution towards meeting indicative growth targets and will not undermine the Plan objectives.'</p> <p>The word 'indicative' does not mean 'compulsory' and so Bratton does not have to fulfil targets beyond its own requirements (see results of Bratton housing needs Survey 2014 for needs, which are substantially lower than the suggested 40 houses).</p> <p>In striving to meet a target, this development would have a detrimental impact on a beautiful rural village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1790	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704825		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is an incorrect assumption that public transport services are already in place to meet the needs of additional residents from 40 extra houses</p> <p>Table E1 (Transport) states that 'A regular bus service exists connecting the village with Westbury and Trowbridge.' The service is not particularly regular, with intervals of up to 3 hours between buses. Villagers would rely heavily on cars to journey beyond the village, thus increasing traffic congestion.</p> <p>For pupils attending Matravers School and wishing to stay after school for extra-curricular activities, no buses are available to return pupils to the village until after 6pm. This puts pupils at a disadvantage when compared to pupils residing in the town, who can safely walk home.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1791	Consultee Mr Duncan and Hayley Turp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Drainage and surface water is a big problem in and around the village of Bratton. Roads have residual surface water on them for a long period after rainfall and this problem will be magnified on all roads below the development. The development scored negatively in 9 out of 12 categories, 2 of the positive categories are very similar and will always score well as a default.</p> <p>Drainage and surface water is a big problem in and around the village of Bratton. Roads have residual surface water on them for a long period after rainfall and this problem will be magnified on all roads below the development. The development scored negatively in 9 out of 12 categories, 2 of the positive categories are very similar and will always score well as a default.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1792	Consultee Mr Duncan and Hayley Turp	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The B3098 is a well-used road and a major junction will cause significant delays and increase the risk of accidents. The development does not have the physical capacity to accommodate the amount of vehicles that will be owned by the new residents. This will cause congestion on the main road – B3098 – and overflow into the surrounding roads and residential areas. The congestion will have an extremely detrimental effect on the village – 1 badly parked car can cause traffic jams up to 10 cars long so the impact of up to an additional 80 cars will be catastrophic to the peace and tranquillity, road safety, and air quality of the village.</p> <p>The B3098 is a well-used road and a major junction will cause significant delays and increase the risk of accidents. The development does not have the physical capacity to accommodate the amount of vehicles that will be owned by the new residents. This will cause congestion on the main road – B3098 – and overflow into the surrounding roads and residential areas. The congestion will have an extremely detrimental effect on the village – 1 badly parked car can cause traffic jams up to 10 cars long so the impact of up to an additional 80 cars will be catastrophic to the peace and tranquillity, road safety, and air quality of the village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1793	Consultee Mr Duncan and Hayley Turp	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126766	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Bratton		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Bratton surgery is already struggling with the demand on its services. Up to 100 extra residents will cause more problems and increase waiting times at the surgery.</p> <p>In 2014, Wiltshire Council published the results of the Bratton Parish Housing Needs Survey. The aim of the survey was “to investigate the need for affordable housing among local people (or those who have a need to live in the parish or the locality) of Bratton.” The survey recorded a “very good” response rate of 198 replies (35.9%). Of the 198 replies, 11 respondents indicated their need for additional housing in Bratton. All declared a local connection to Bratton, and the most popular reason given for needing to move was in order to move on from living with families and achieve independence.</p> <p>An online search shows 54 houses available in Westbury and a 3-mile surrounding area, ranging from 1 bedroom to 3 bedrooms – all under the national average price. There is NO NEED to build new developments, as there is already more property available than is being proposed.</p> <p>The Bratton surgery is already struggling with the demand on its services. Up to 100 extra residents will cause more problems and increase waiting times at the surgery.</p> <p>In 2014, Wiltshire Council published the results of the Bratton Parish Housing Needs Survey. The aim of the survey was “to investigate the need for affordable housing among local people (or those who have a need to live in the parish or the locality) of Bratton.” The survey recorded a “very good” response rate of 198 replies (35.9%). Of the 198 replies, 11 respondents indicated their need for additional housing in Bratton. All declared a local connection to Bratton, and the most popular reason given for needing to move was in order to move on from living with families and achieve independence.</p> <p>An online search shows 54 houses available in Westbury and a 3-mile surrounding area, ranging from 1 bedroom to 3 bedrooms – all under the national average price. There is NO NEED to build new developments, as there is already more property available than is being proposed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1794	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The development of the site will increase pressure on secondary school places in Westbury (Matravers)</p> <p>Table G4 states: 'Matravers (secondary and sixth form in Westbury) currently has some surplus spaces but these are expected to reduce over the next 10 years' (as expanding primary schools in the Westbury area feed into Matravers). The report then states 'The school could be expanded if necessary', without explaining how this funding would be found, or offering mitigation measures to finance the extra places needed as a result of attracting large numbers of new families to the village of Bratton.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1795	Consultee Mrs Fern Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	An incorrect assumption has been made that more housing and people are required to fill the local Primary School Table G4 states that the local Primary School in Bratton has ‘a large number of surplus places and would benefit from housing within the catchment area.’ An assumption has been made that the school is not full because there are insufficient children living in the village to fill it. Traditionally Bratton Primary School has been full to capacity, and occasionally village children have had to be turned away (I spoke to one resident in Bratton who told me this had happened to her children). Parents from Westbury, Steeple Ashton, West Ashton and the surrounding area have been happy to bring their children to the school. In recent years there has been a very large number of experienced and long-term staff leaving, leading to some degree of instability. The school has become less sought after; some Bratton children are attending Westbury Schools as a matter of choice, and numbers have declined. As the school builds its reputation again, numbers will increase (the school could potentially attract children from the new White Horse Way development on the eastern edge of Westbury). The premise that the village needs more housing and more people is incorrect.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1796	Consultee Mrs Fern Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704825	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Site 321 should have been removed from consideration at Stage 3 of the site selection process as the conclusions of the Sustainability Appraisal are flawed</p> <p>6.16 states that the performance of the site has been measured against 12 objectives that cover the likely environmental, social and economic effects of development.</p> <p>6.18 states that sites are rejected where the appraisal concludes development would result in one or more major adverse effects.</p> <p>6.19 concludes that 321 was not rejected after stage 3 (presumably because it did not score for a 'major adverse effect')</p> <p>I believe that the scoring system is flawed and that site 321 should have been rejected at stage 3.</p> <p>Objective 7 is as follows: 'Conserve and enhance the character and quality of Wiltshire's rural (and urban) landscapes, maintaining and strengthening local distinctiveness and sense of place.' The Sustainability Appraisal rating gives this objective only one 'minus' scoring, whereas in fact it should have been assessed as having a 'major adverse effect', due to its high visual impact on the edge of the village and the significant difference it would make to views from the ridge above Bratton.</p> <p>Bratton is a unique and special place and its distinctiveness should be maintained. Every year I take photographs of the beautiful landscape around the village and produce a calendar which is sold to raise money for charity. The majority of the photographs are taken from the ridge above Bratton, and people travel from miles around to walk in the surrounding hills and look down upon miles of unspoilt countryside.</p> <p>A large housing development would have a MASSIVE detrimental effect on the character and distinctiveness of the village, and to score only one 'minus' point seems contrived and far-fetched.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1797	Consultee Graham Hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126137		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the June 2017 Wiltshire Housing Site Allocations Plan Pre-submission Draft Assessment under the Habitats Regulations places a significant emphasis on the danger to habitats. This is far more wide-reaching than hitherto and suggests further obstacles to the development of site 3565. The public release of this document comes literally at the conclusion of the consultation period and does not provide the opportunity for informed public scrutiny of this document and the inclusion of this information within public objections.</p> <p>This timing could be seen to be highly suspicious, especially in the light of the cancellation of the promised second public presentation in Trowbridge (committed to in June 2017 and cancelled at the end of August with little or no public information) and the refusal to even acknowledge requests to extend the consultation process to make allowances for officers summer leave arrangements as detailed in my full submission.</p> <p>The fact that this document has been referenced in Council documentation and has not been available for independent scrutiny and public access for the entire period of the consultation is a matter of grave concern and questionable procedure. Any public access has been based on the 2012 HRA and does not contain references to surveys made by Wiltshire Wildlife in 2015, 2016 and 2017 which are of direct relevance to the Site Allocation Proposal.</p> <p>Full and honest placing of publicly-funded information in the public domain.</p> <p>Pertinent documentation to any objection made available to all at the start of a process such as this.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The arguments supporting the objection are detailed and cross-reinforcing and deserve the opportunity to be fully aired and considered.				

Comment ID:	1798	Consultee Mr and Mrs West	Agent Mr Richard Cosker RCC Town Planning Consultancy	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130564	Person ID: 1120649	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.35			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1 The Draft Wiltshire Housing Sites Allocation Plan is unsound, as it is not based upon a robust and credible evidence base and therefore not justified. We believe that the evidence on the ground does not support the choice the Council have made with regard to the proposed revisions to the settlement boundary for the village of Crudwell set out on the map on page 27 of the document and that using the Council's revised methodology there are realistic alternatives to the position of the settlement boundary for Crudwell.</p> <p>1.2 As a result the plan does not comply with the requirements of paragraph 182 of the NPPF. To be sound the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence. We consider that the settlement boundary should be revised to incorporate the Ridgeway Farm development site and the adjoining houses situated along the north side of Tetbury Lane in Crudwell.</p> <p>1.3 The settlement boundary review methodology which helps guide the settlement review process is set out in the Wiltshire Housing Site Allocations Plan Pre Submission Draft Plan Topic Paper 1, published by the Council in June 2017. This advises that areas that should be incorporated within the revised settlement boundaries should include residential and community facilities development that is physically related to the settlement, as compared to areas which are excluded such as employment development, farm buildings and farm yards at the edge of large villages and isolated development that is physically detached from the settlement. The revised methodology for determining the new settlement boundaries also states that built and commenced planning permissions should be included within the settlement boundaries (our emphasis).</p> <p>1.4 In August 2015, outline planning permission was granted at Ridgeway Farm, Tetbury Lane in Crudwell for the erection of 10 dwellings and associated works (planning reference no 15/03136/OUT). A subsequent reserved matters approval was granted in February 2017 (reference no 16/09797/REM). Work has started on this development site.</p> <p>1.5 The revised settlement boundary review methodology recognises that for those planning permissions where development has commenced, there is much greater certainty over the final built form of the development and as a result concludes that 'built or commenced planning permissions' should be included within the settlement boundary.</p> <p>1.6 Therefore, having regard to this methodology as work has commenced on this planning permission, the settlement boundary for Crudwell, which excludes the Ridgeway Farm site is clearly unsound on the 'justified' grounds and should be amended.</p> <p>1.7 We also consider that the houses adjoining the development site, situated along the north side of Tetbury Lane, should be included within the settlement boundary. Our client owns Thyme Cottage, the end dwelling of a terrace of houses that form part of a compact row of six residential properties which are physically related to the village and that front and extend westwards along Tetbury Lane from the Ridgeway Farm residential development site toward the principal range of the community facilities available within the village. Immediately to the east of Thyme Cottage sitting close to Tetbury Lane, is Cleaver House. Both of these two properties have been significantly altered and extended since the last settlement boundary was drawn up resulting in a consolidation of development in this location.</p> <p>1.8 The westernmost property of this group of 6 dwellings is Ye Olde Forge, which sits opposite the access to the community facilities. These incorporate the village hall, where the Crudwell pre-school is based, and the recreation ground including equipped play areas, tennis courts and</p>				

playing pitches. These are extremely well used facilities and access to them is from Tetbury Lane, passing in front of the aforementioned properties.

1.9 Clearly the houses on the north side of Tetbury Lane, read as a continuation of the village and very much form part of built up area of the village (therefore 'physically related to the settlement'), especially now that the development at Ridgeway Farm has now been permitted and work started on that development. Indeed, the principal and most widely used community facilities within this village are situated further still along Tetbury Lane. The logical boundary position for the revised settlement boundary should include these residential properties particularly having regard to the position of the village hall.

1.10 Our clients are currently appealing against the Council's decision to refuse planning permission for the conversion of an existing detached domestic outbuilding to a dwelling within the side garden of Thyme Cottage. The Council's first reason for refusal refers to the location of the site beyond the defined settlement boundary for Crudwell and as such they consider that the proposal amounts to a new dwelling in the open countryside. The Council concludes that the proposal would be "located remote from a range of services, employment opportunities and unlikely to be well served by public transport" and would thereby be an unsustainable location. We cannot agree, as this is simply not the case.

1.11 The photograph in figure 1 below is taken from the garden of Thyme Cottage towards the new houses currently under construction at the Ridgeway Farm site. This clearly shows just how closely associated the development site is to our clients property and how the sustainability argument put forward by the Council in their reasons for refusal is nonsensical.

1.12 Significantly, the Council's planning officer considering the acceptability of the outline planning application at Ridgeway Farm in 2015 (reference no 15/03136/OUT) which was outside of the dated settlement boundary, describing the site stated:

'Existing development lies to the east and west of the site and the development would therefore to a certain extent sit within and relate to the built form of the village.'

1.13 This view that this part of the village sits within the built form of the village and is physically related to the settlement has been carried forward in the Malmesbury Community Area Topic Paper, which aims to ensure a sufficient choice and supply of suitable housing sites. The comments expressed in this paper are of relevance to the consideration of whether the settlement boundary should be extended to include these houses.

1.14 The site selection process for the entire Malmesbury Community Area has identified only one preferred site for allocation for housing development. The site is at Ridgeway Farm in Crudwell (Site 3233) and adjoins the current Ridgeway Farm development site. The site allocation, which includes open agricultural land, has been identified for a development of 40 houses in addition to the 10 already permitted.

1.15 The sustainability appraisal for this housing allocation included in the Topic Paper states that there are no major adverse effects identified in allocating this site for housing. This appraisal states that the identified site is:

'located within a reasonable walking/cycling distance to the centre of the village' and that it:

'is closely related to the village and is within walking distance of the services and facilities within the settlement'.

1.16 The land at Ridgeway Farm site allocation is assessed as 'more sustainable' within this area of search. The Topic Paper describing the allocated site states:

'a logical boundary that reflects the existing settlement pattern would develop land between the current consent and land to the east and north towards the Dawneys'.

1.17 In comparison with other large villages within the community area, Crudwell has received the lowest amount of growth over the Plan period to date. The Council state this preferred site is available, achievable and deliverable and that it would represent a significant contribution towards meeting the residual requirement for housing in the Malmesbury Community Area (is 70 dwellings).

1.18 Therefore, having regard to the methodology, the houses on the north side of Tetbury Lane fit within the definition of residential development that is physically related to the settlement, as compared to areas that are excluded such as isolated development that is physically detached from the settlement. As a result, the settlement boundary for Crudwell, which excludes these properties is clearly unsound on the 'justified' grounds and should be amended.

1.19 Figures 2 and 3 (see separate sheet) show the relationship between the approved housing site at Ridgeway Farm (which having regard to the council's methodology must now be included within the defined settlement boundary) and the adjoining houses on the north side of Tetbury Road, the new housing allocation and the community facilities.

	<p>Using the Council's own settlement boundary review methodology, the proposals for the revised settlement boundary for Crudwell shown on the plan on page 27 of the WHSAP should be extended to include the Ridgeway Farm development site and the residential properties situated on the northern side of Tetbury Lane in grid references G6 and H6, up to and including the property Ye Olde Forge. These changes to the revised settlement boundary for Crudwell are required to ensure it complies with the methodology as:</p> <p>It would include a residential development site where work has commenced, and</p> <p>It would include residential properties that a physically related to the settlement.</p> <p>These changes would ensure that the Plan justified and therefore sound.</p>
Attached files (Please see Objective)	4719747
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1799	Consultee Graham Hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126137		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As detailed in my submission of Monday 11th September The proposed inclusion of this site is neither desirable nor sustainable and, should brownfield and windfall land be taken into consideration, will produce excess housing without adequate infrastructure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The arguments supporting the objection are detailed and cross-reinforcing and deserve the opportunity to be fully aired and considered.				

Comment ID:	1800	Consultee Graham Hill	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126137	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Changes to the Environment Agency flood and surface water map show the site to be unsuitable and will result in additional peril for the current built form. This must inform the removal of this site from the proposal.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The arguments supporting the objection are detailed and cross-reinforcing and deserve the opportunity to be fully aired and considered.			

Comment ID:	1801	Consultee Graham Hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126137		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Access to the site can only be achieved through illegal means, either by building directly on a level 3 floodplain or by ignoring the 1997 hedgerows act. This must inform the removal of the site from the proposal.</p> <p>Distance to transport hub(s) is greater than optimal and access is only via existing overcrowded road links. This must inform the removal of the site from the Proposal.</p> <p>External agencies have assessed the site as being only 'marginally sustainable'. This must inform the removal of the site from the Proposal.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The arguments supporting the objection are detailed and cross-reinforcing and deserve the opportunity to be fully aired and considered.			

Comment ID:	1802	Consultee Graham Hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126137		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Impact on the environment both spatially and in respect of notified protected species (notably the bat and vole populations) will be overwhelmingly negative. This must inform the removal of the site from the proposal			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The arguments supporting the objection are detailed and cross-reinforcing and deserve the opportunity to be fully aired and considered.			

Comment ID:	1803	Consultee Graham Hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126137		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Lack of planned or committed infrastructure places strain on overstretched public services. This must inform the removal of the site from the Proposal				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The arguments supporting the objection are detailed and cross-reinforcing and deserve the opportunity to be fully aired and considered.				

Comment ID:	1804	Consultee Mrs Louise Rendle	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126771		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are writing to state our opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan.</p> <p>Having lived in the area around Boundary Walk and latterly Spring Meadows for all of my life, my family have always used the land as a recreational space and have valued it's function as an asset to the local community both for farming and leisure.</p> <p>Wiltshire's' Joint health and Wellbeing strategy recognises the 5 Steps to Wellbeing and states 'the link between housing, planning and development and the health of the community is recognised: given that physical and mental wellbeing depend on a broad range of characteristics including facilities for active travel, public transport and green spaces.'</p> <p>The proposed use of this site for houses appears to be contradictory to the above statement about the importance of green spaces for our wellbeing. This is in addition to the fact that Public services and access to significant public transport hubs are out of specified range for this development.</p> <p>The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. We would ask that this valuable green spaces is retained for future generations to enjoy.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1805	Consultee Mrs Louise Rendle	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126771		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is a large collection of bird and animal species, which currently populate the above site including it's bordering hedgerows and these populations will be denied an ecological niche, which has been in existence for over 100 years.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1806	Consultee Mrs Louise Rendle	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126771		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The road and current housing system in and around the area to include Frome Road, Bradley Road and Silver Street Lane is not suited to the increased traffic that would clearly result. These roads are already used as a “rat-run” with vehicles regularly breaking the 30mph speed limit. There would be greater risk to pedestrians, many who are children who commute to and from local schools and Trowbridge College. There would also be a greater risk to public health caused by the increased traffic pollution.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1807	Consultee Mrs Louise Rendle	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126771		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As identified in Wiltshire's Core Strategy (2015) it was also recognised that the villages surrounding Trowbridge including Southwick have separate and distinct identities and as such Open Countryside should be maintained.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1808	Consultee Mrs Louise Rendle	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126771	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Housing on this site would not only contradict government policy of building on brownfield sites in preference to greenfield, but would cause massive problems in its creation and existence for current residents. Much of the building would take place in an area of notified flooding and standing surface water, which would mean that the existing residents would have their property seriously threatened by an increased risk of flooding due to additional impermeable surface				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1809	Consultee Miss Janet Goddard	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126757		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>While everyone understands that housing is important, surely the Salisbury area has had its fair share? There are the developments between the Downton Road and the hospital, the old UKLF site and the infill between the Devizes Road and The Avenue, not to mention those at Old Sarum and Downton. If this development is allowed to go ahead it would be a short step to further development between the Cattle Market and the Park Wall, resulting in Salisbury being surrounded by miles of suburbs. Not a good look for a city heavily dependent on tourism!</p> <p>On a different tack altogether, surely in a time of looming Brexit and uncertainty over trade deals it is short sighted and foolish to take acres of farmland out of production when the country should be aiming to become more self-sufficient?</p> <p>To sum up – please do not make a decision which future generations will come to regret.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1810	Consultee Miss Janet Goddard	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126757	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The additional traffic flow resulting from these houses will be disastrous to the already strained A3094 which is the only route through Harnham. Only a few weeks ago Harnham was brought to a complete standstill within minutes following a tragic accident when a pedestrian was struck by a lorry, and frequently the queues at rush hour at the lights at either end of the A3094 can tail back as far as the One Stop shop and the Garden Centre. A few years ago a smaller development was rejected on the grounds that the road system could not support the increased traffic so how can a development twice the size be feasible?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1811	Consultee Bovis Homes Limited Person ID: 841393	Agent Mr Desmond Dunlop Managing Director D2 Planning Limited Person ID: 558013	Do you consider the draft WHSAP is legally compliant?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1 Netherhampton Road			Justified Effective	No Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land at Netherhampton Road, Salisbury – Policy H3.1</p> <p>At the outset Bovis Homes support the Council's decision to allocate additional land for housing due to the remaining residual requirement which is not identified within the Core Strategy. However, part of the need to identify additional land in and around Salisbury/Wilton is due to the potential delay in the delivery of a number of strategic sites in South Wiltshire. Bovis Homes is not surprised at the potential non delivery of a number of strategic sites and has previously made representations to the Wiltshire Core Strategy to that effect.</p> <p>Whilst Bovis Homes support the Council's decision to identify land under their control at Netherhampton Road, Salisbury (Potential Site Options 1028) for a mixed use development comprising housing, employment, community and social facilities they are disappointed that not all of the available land is identified for residential development. They consider that there is no justified reason why the additional land should not be allocated, particularly as considerable discussions have taken place with the Council to demonstrate the availability, suitability and deliverability of the site. A Vision Document was produced and sent to the Council to demonstrate that Bovis Homes have instructed a team of consultants to deal with the various issues relating to the deliverability of the site. That document demonstrated that there were no issues which represented a constraint to the development of the site in a timely manner. An update Vision Document is attached which reaffirms the site's deliverability. It is considered that the site is ideally placed to meet part of the additional housing requirement.</p> <p>The site was previously identified by the South Wiltshire Core Strategy as a draft strategic site, which signals the acceptance of the Planning Authority to release it for development i.e. 400 dwellings and 10 hectares of employment land. It was only deleted as an allocation because of a reduction in the overall housing provision for South Wiltshire not because of any site specific concerns, and essentially retains a 'reserve' allocation. Clearly additional land for housing is now required and the entire site is ideally placed to assist in meeting that need because: - (see Vision Statement)</p> <p>The site comprises intensively farmed arable land that is in one ownership. The farmland is 'in hand' and not subject to any agricultural tenancies. It is therefore available for development now and is achievable with a realistic prospect for delivery, as the land is in the control of an experienced developer i.e. Bovis Homes.</p> <p>The site is located to the west of the Harnham Business Park which is located within the settlement limits. The existing employment area will form a buffer between the proposed development and existing residential areas to the east. Existing residents will not therefore be directly affected by the proposed development (i.e. by issues of overlooking etc). Although development of the site would not immediately adjoin an existing area of residential development, its location adjacent to an existing employment area, public sports pitches, golf course and racecourse all help to ensure it can be integrated into the community, in a highly sustainable location.</p> <p>The site can be satisfactorily accessed through the introduction of a junction to the requisite standards along the A3094 Netherhampton Road. Bovis's retained highway consultants have confirmed that such an approach is acceptable.</p> <p>The site is located by road some 4.8km from the City Centre and Railway Station. However, a more direct route is available via the Tow Path, which is a distance of 2.8km from the City Centre. Accordingly the walking and cycling distance is approximately half the road distance, this</p>				

should encourage walking and cycling to the City Centre where there is a range of services, community facilities, employment opportunities and public transport.

The site is located within 5km (acceptable cycling distance) of a strategic employment site e.g. Southampton Road.

Furthermore the site is also within easy walking and cycling distance of a number of other local employment areas at: -

- o Harnham Trading Estate and Harnham Business Park
- o Ashfield Road Trading Estate
- o The Malverns, Cherry Orchard Lane
- o Kingsway Industrial Estate Wilton
- o Barnack Industrial Estate
- o Milford Trading Estate, Blakey Road off Tollgate Road

The site is therefore in an excellent location to access local employment opportunities by foot or cycle, thereby reducing reliance on the private car.

The site is not within any valued landscape as defined within the NPPF (paragraph 119). The landscape has capacity to assimilate development whilst retaining views of Salisbury Cathedral etc. The Landscape & Visual Impact Assessment has been undertaken and confirms the site's capacity to absorb the quantum of development proposed.

The site is not the subject of any ecological designation or designated sites of importance for biodiversity (e.g. SPA, SSSI). The eastern boundary of the site is located 250m to the west of a SSSI. The SSSI is a geological site adjacent to existing residential development to the north.

In order to provide a buffer between the SSSI and any new development (in addition to that already provided by the chalk pit) an area of open space could be incorporated along the eastern boundary of the site adjacent to the chalk pit.

The site is in arable use. It has been substantially managed and regularly ploughed.

Hedgerows are sparse and there are virtually no trees (apart from isolated trees close to the Netherhampton Road) on the site. There is therefore little opportunity for protected species to establish themselves on the site. The proposals would provide an opportunity to provide biodiversity enhancement measures, including the introduction of a wider variety of habitats than currently present across the agricultural land.

The entirety of the site is located within Flood Zone 1 and there are no flooding issues.

Surface water would be capable of being discharged to the ground via infiltration techniques.

The nearby Petersfield Sewage Treatment Works has satisfactory hydraulic capacity to accommodate predicted foul water drainage from the proposed development.

There are no statutorily designated heritage assets within the site or in proximity of the site.

Development of the site could provide a range of community benefits for existing and future residents in Harnham, namely: -

- o Provision of new area of public open space, enhancing existing provision;
- o Improvement to public transport serving the area;
- o Increased employment opportunities within walking and cycling distance; and
- o Provision of a range of local convenience services and facilities within any proposed local centre.

In view of the above, the allocation of the land is welcomed and we can confirm that it is available and deliverable within the Plan period. Indeed Bovis would be looking to submit an application as soon as possible.

With specific regard to the proposed policy we would comment as follows: -

- i. Approximately 640 dwellings
- ii. The Vision Statement demonstrates that the site is capable of accommodating up to 640 dwellings.
- iii. Land for employment (B1, B2 & B8 uses of the Use Classes Order)
- iv. The Vision Statement and illustrative masterplan have identified an area for employment uses and support is given to the flexibility between the use classes afforded by the proposed wording. However, concern is expressed at the lack of a firm evidence base regarding the quantum of employment land. Objections are therefore lodged to this aspect of the policy.
- v. At least 1.8ha for a two form entry primary school along with playing pitches. There are no objections in principle to the development meeting its need for primary education. However, the requirement for a 1.8ha two form entry primary school is beyond that which is justified for the proposed development. Accordingly Bovis object to this requirement.

vi. A local centre

vii. The submitted Vision Statement shows provision of a local centre within the overall development proposals.

viii. A country park of at least 10ha in size with associated parking and facilities. The identified Vision Statement shows provision of at least 10ha of public open space but Bovis would question whether the term 'country park' is appropriate rather it should be renamed as 'public open space'. The draft policy goes on to state that development will be subject to the following requirements: -

Strategic landscaping and open space provision. All built development to be located below the 75m corridor and a Country Park located on the east and south of the site. The Vision Statement shows that the development will be provided with strategic landscaping and open space. In addition built development will be restricted to below the 75m corridor. Furthermore, as stated above a Country Park is also included as part of the proposals. Transport Network Improvements necessary to accommodate the scale of development envisaged. The necessary transport network improvements will be undertaken as part of the proposed development provided they are proportionate to the impact from the proposed development.

Provision of sufficient school and healthcare capacity to meet the need created by the development. Reference has already been made to the proposed education provision. Bovis believe that the provision of a 1.8ha two form entry primary school as not proportionate to the need created by the proposed development. With regards healthcare provision once again there is no objection in principle to the provision of healthcare provision however at present there is no evidence available in terms of the need for additional healthcare facilities etc. Bovis believe that additional evidence is required.

Measures to safeguard the interest of Hornhill Hill Chalk Pit SSS2 and Harnham Slope Country Wildlife Site. The proposed development is capable of safeguarding the Harnhill Hill Chalk Pit SSS1 and the Harnham Slope Country Wildlife Site.

Surface water management that achieves equivalent or less than current greenfield rates of run off. The surface water management program will be designed to be equivalent to or less than greenfield run off rates.

Development will take place in accordance with a masterplan for the site approved by the Council.

Bovis will prepare a masterplan for the site. However, it is unclear from this criterion how it will be approved by the Council. Further information is required on how this process will operate.

Other policies within the Site Allocations DPD indicate that the masterplan should be approved as part of the application process and Bovis consider that this should equally apply to their masterplan.

Finally, we note the viability assessment undertaken by BNP Paribas. This assessment has been undertaken without any consultation or input from Bovis Homes. Accordingly at this stage Bovis would object to the viability assessment.

Recommendations

In view of the above, Bovis recommend that: -

- i. All of the land within their control be identified within the proposed allocation.
- ii. Object to the proposed provision of a 1.8ha site for a two form primary school which is beyond that required for the proposed development.
- iii. Object to the level of employment land given the lack of a robust evidence base.
- iv. Object to the lack of guidance regarding the approval by the Council of any masterplan for the site. The masterplan should be approved as part of any planning application.
- v. Object to the requirement for a healthcare contribution when there is no evidence base to justify that requirement.
- vi. Object to the viability assessment with regards the site.
- vii. Object to the terminology 'country park' and consider it more appropriate to refer to it as 'public open space'.

Attached files (Please see Objective)

4743625 / 4743626

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The issues raised need to be the subject of discussion and debate.

Comment ID:	1812	Consultee Miss Janet Goddard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126757	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The additional traffic flow resulting from these houses will be disastrous to the already strained A3094 which is the only route through Harnham. Only a few weeks ago Harnham was brought to a complete standstill within minutes following a tragic accident when a pedestrian was struck by a lorry, and frequently the queues at rush hour at the lights at either end of the A3094 can tail back as far as the One Stop shop and the Garden Centre. A few years ago a smaller development was rejected on the grounds that the road system could not support the increased traffic so how can a development twice the size be feasible?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1813	Consultee Miss Janet Goddard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126757	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are no bus services, shops, doctors or dentists in this area – all these facilities would have to be accessed in Salisbury or Wilton, neither of which is in practical walking distance so yet more car journeys would be added to the commuter traffic.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1814	Consultee David Bailey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130710	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Draft Site Allocations Plan.</p> <p>Like most in Crudwell I am not against reasonable development. Over the 34 years that I have been a resident there have been several developments (including Kingsmeadow and Gooselands) and further expansion through in-fill. Most recently, approval has been granted for ten new dwellings at Ridgeway Farm, and frankly, that is enough. The suggestion that a further 40 dwellings could be built there is disproportionate and unacceptable since it represents a 20% increase to Crudwell's housing stock.</p> <p>There is no strategic need for a site of this scale (50 dwellings in total) in Crudwell. The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p> <p>Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities" but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy. Crudwell has already begun the process of producing a Neighbourhood Plan, which will include a survey to determine any local needs for housing exist and how they should be met. To reiterate, Crudwell is not anti-development ... it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan.</p> <p>Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1815	Consultee Land at Mill Lane, Stratford Sub-Castle, Salisbury Landowner	Agent Richard Greenwood Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1130720	Benchmark Development Planning Ltd Person ID: 894742	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>For the reasons set out below, we recommend that this site is allocated for housing development in the emerging draft Settlement Boundary and Housing Land DPD.</p> <p>The proposal involves amending an anomaly where a parcel of land within the built-up area of Stratford Sub-Castle, that is connected to and a part of the City of Salisbury, has been partially excluded erroneously from the settlement boundary (see Appendix 1). The access land is within the settlement and the small plot that is enclosed on three sides by housing has bizarrely been excluded.</p> <p>The land plays no strategic role. It is not needed to check urban sprawl; nor the merging of settlements; development of this infill plot would not lead to encroachment into the open countryside; most certainly the special character of Salisbury and Old Sarum will be preserved (completely); and, finally, allowing this to proceed will recycle land well suited for housing and relieve, in a small way, pressure for development on the more sensitive open countryside at sites in Salisbury including H3.1 + H3.4 Netherhampton Road and H3.3: Rowbarrow.</p> <p>We do not understand why Officers have not included ALL of this land within the settlement boundary as there would be no adverse effects. However, we recognise that Officers are recommending that where new housing allocations are proposed these can be identified beyond the new settlement boundaries.</p> <p>Whilst we do not agree that this is a sound way forward because it means the settlement boundaries are already out of date – in Salisbury’s case land already being developed at Fugglestone Red and Longhedge are being excluded (see Appendix 1).</p> <p>In our opinion, this is confusing and undermines confidence in the planning system: it is an unsound approach.</p> <p>If the Inspector does not agree with us, we request this land be allocated in its own right as it is suitable, available and viable development land. The land is not within a Flood Risk area or within the setting of a listed building(s) or a Scheduled Monument. Old Sarum is about 1 km to the north and quite separate from the well enclosed infill site within the existing built up area (See Appendix 2).</p> <p>There has been an appeal in respect of this land, in 2007 (see Appendix 3). This decision seems to be out of step with the current planning policy framework and the NPPF.</p> <p>The Inspector in 2007 considered the proposed use of the land as a residential garden.</p> <p>The Inspector at paragraph 3 of the appeal decision states that allowing the use of the land as a garden would lead to the erosion of the countryside setting of the village and harm its appearance and character.</p> <p>We wholly disagree with the Inspector’s statement. It seems to be completely at odds with the actual position and setting of the land – see our photographs and locations plans submitted today with this objection.</p> <p>We say: allocating this site for housing development – for one bungalow – as set out on our plan BEN 0006 – would not in any way lead to the erosion of the countryside. Nor could it harm the character or appearance of the settlement because it is so tightly constrained by existing development and significant hedges and trees. There are no public views of the site, except from Mill Lane and that would be fleeting and from some distance (+50m) and easily resolved with the planting of a single tree (see BEN 0006).</p> <p>The access meets current highway standards – Mill Lane is a cul-de-sac, not a through road.</p>				

	<p>This is a sustainable proposal and it will help underpin national and local planning policies that seek to encourage the delivery of sustainable development in economic, social and environmental terms.</p> <p>Conclusion: We do not claim that allocating this proposal is essential to the vitality of the area. However, we do say that it is important. Local government should seek to allow acceptable infilling such as this site.</p> <p>By allocating further land the WHSAP will be more likely to meet the 5 Years Housing Supply for South Wiltshire Housing Market Area to the end of the period (2026) and housing need generally in this area during the Plan period.</p> <p>To deliver this much needed housing there need to be a correction to the currently unsound proposals for revisions to Salisbury's Settlement Boundary.</p>
<p>Attached files (Please see Objective)</p>	<p>4720321 / 4720322 / 4720323 / 4720324</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To explain to the Inspector the merits of this objection and to examine in public the Authority's case, as presented to the Examination (assuming the Authority do not accept our objections and modify the WHSAP).</p>

Comment ID:	1816	Consultee Coulston Estates	Agent Mr Chris Beaver Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 901939	Planning Sphere Person ID: 901806	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Proposed allocation: the proposed allocation of Elm Farm under Policy H2 is supported in principle. This follows a collaborative approach that has been undertaken between Coulston Estates and Wiltshire Council following the acquisition of the site in 2015.</p> <p>Policy H2.1: the land area extent set out in Policy H2.1 and Paragraph 5.46 is incorrectly stated as 14.33ha. The correct extent of the allocation site is 14.95ha. This is shown on the enclosed Site Location Plan (Plan Ref: 1178.E.001).</p> <p>Fig 5.5: there is an error in the extent of the redline allocation site in Fig 5.5, which does not align with Coulston Estates ownership. This discrepancy is highlighted in the enclosed 'Corrected Development Plan Allocation boundary' (Plan Ref: 1178.E.010).</p> <p>Land ownership: the enclosed land ownership plan (Plan Ref: 1178.E.003) confirms that Coulston Estates are the freehold owners of Plots 1 and 2. Coulston Estates have an option to purchase Plot 3. Plot 4 is in third party ownership, but the landowner has confirmed that the land is available for development.</p> <p>Summary overview of site promotion: following the acquisition of site in 2015, Coulston Estates instructed PlanningSphere to promote the subject site through the Wiltshire Housing Sites Allocation Plan process. Initial representations were submitted in 2015 to ensure the registration of the site in the SHLAA process. A representation was submitted to Wiltshire Council in March 2015 in response to the informal consultation on 'initial site options'.</p> <p>Following this a comprehensive measured survey was commissioned, and extensive studies relating to ecology, drainage, transport, landscape were undertaken. A dialogue was also established with Trowbridge Town Council and Wiltshire Council's Spatial Planning Team.</p> <p>Trowbridge Town Council confirmed their formal support for the allocation in their response to the parish/town Council consultation that took place in the summer/autumn of 2015.</p> <p>An initial pre-application enquiry was submitted to Wiltshire Council showing a first phase residential development proposal in the context of a wider masterplan vision for the whole allocation site, under LPA Ref: 16/06760/PREAPP. The feedback received from the pre-application process led to further detailed drainage studies and ecological assessment and mitigation plans. Discussions over works to the existing Elm Grove recreation field were had with Wiltshire Council and Trowbridge Town Council.</p> <p>In view of the Trowbridge primary school capacity constraint, discussions were undertaken with Wiltshire Council with regard to accommodating a 1.8ha primary school site as part of the allocation. Following informal dialogue with council officers it was agreed that a school site could be accommodated on the allocation subject to Wiltshire Council taking full responsibility for its deliverability.</p> <p>Subsequent to the publication of the draft Plan in July 2017, a series of meetings have taken place with Wiltshire Council to discuss the delivery of the site, and the required mitigation measures to address the various technical constraints including: heritage; utilities; drainage; transport, ecology, landscape; and urban design.</p> <p>A dialogue has been commenced with Network Rail in respect of the culvert that carries the existing watercourse under the railway where it connects to the river Biss at Ashton Park. Coulston Estates are examining the feasibility of engineering options to improve surface water conveyance under the railway embankment. If these engineering proposals can be delivered with the agreement of Network Rail the potential</p>				

	<p>residential development quantum of the site could be increased above the levels indicated in the enclosed draft masterplan and accommodation schedule. However, the proposals, as currently drafted, assume that the culvert will remain as existing.</p> <p>Technical work in progress: the following technical summary reports are included to demonstrate that the technical work in progress, which underpins the draft masterplan plan and development capacity assessment:</p> <p>Transport (CDA): Transport Technical Note (September 2017) Landscape (Greenhalgh LA): Landscape Strategy (September 2017) Drainage (AW Water Engineering): Draft Flood Risk Assessment (September 2017) Ecology (Engain): Summary Ecology Report (September 2017) Utilities (WYG): Utility Report Assessment (February 2016) Heritage (Heaton Heritage Consultants): Archaeologic and Historic Assessment (January 2017)</p> <p>There is also drone footage and oblique aerial photographic records of the site</p> <p>Draft Masterplan and Site Capacity Assessment: following an extensive and iterative assessment of the site constraints, and feedback from the initial pre-application process (16/06760/PREAPP), the following information is enclosed:</p> <p>An Existing Constraints Plan (Keep Architects): Plan Ref: 1178.E.010 An Illustrative Masterplan (Keep Architects): Plan Ref: 1178.P.001 Illustrative Landscape Masterplans (GLA): Plan Refs: 038-001-D & 038-R001-E</p> <p>An Accommodation Schedule aligned to the draft masterplans is enclosed. The current layout shows how 188 No. dwellings can be accommodated on the site along with a community use building (circa 1,260 sqm) and a site for double form entry primary school (2,200 sqm).</p> <p>Deliverability: Coulston Estates are currently in the process of selecting a housing delivery partner, which they expect to conclude in the Autumn of 2017. Discussion with Wiltshire Council's Education officers have confirmed that the Council will take responsibility for delivering the primary school site subject to being provided with a serviced site by Coulston Estates. This in turn will require agreement of a phased delivery sequenced out the development of Plots 1 and 2 from Drynham Lane. On the assumption that outline planning permission can be secured by the end of 2018 (including an agreed approach to s.106 contributions to maintain scheme viability), it is considered that the proposed allocation of Elm Grove can be fully delivered by April 2022.</p> <p>Statement of Common Ground: Coulston Estates are committed to continue to working proactively with the Council to ensure the phased delivery of this site. It is proposed that a further pre-application enquiry will be submitted in the Autumn of 2017; and that a Statement of Common Ground will be agreed with the Council in advance of the publication of the 'Submission' version of the draft Wiltshire Housing Site Allocations Plan in 2018.</p> <p>Elm Grove, Policy H2.1</p> <p>6th bullet amendment: New cycling and walking routes through the site to link into the existing network and the proposed Ashton Park Strategic Allocation site, and the White Horse Business Park</p> <p>Policy H2.1 and Paragraph 5.46: amend site area from 14.33ha to 14.95ha.</p> <p>Fig 5.5: amend allocation extent to align with the enclosed 'Corrected Development Plan Allocation boundary' (Plan Ref: 1178.E.010).</p>
<p>Attached files (Please see Objective)</p>	<p>4720333 / 4720331 / 4720347 / 4720343 / 4720342 / 4720334 / 4720332 / 4720346 / 4720335 / 4720339 / 4720348 / 4720340 / 4720345 / 4720344 / 4720341</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Coulston Estates wish to be represented at the examination to assist the consideration of the technical issues, and to answer any technical or planning policy related queries that may be raised in the round table discussion by interested parties.</p>

Comment ID:	1817	Consultee Mrs Julie Downton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 702421	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	1818	Consultee Mr Brian Downton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130943	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	1819	Consultee Mr Barrie Higgins Person ID: 702406	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	1820	Consultee Mr Tom Williams	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705359	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	1821	Consultee Ms Kate Williams	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130946	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	1822	Consultee Catherine Brabner-Evans Regional External Affairs Officer - South West Woodland Trust Person ID: 1130951	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As the UK's leading woodland conservation charity, the Woodland Trust's vision is for a UK rich in native woods and trees, for people and wildlife. We work to protect, restore and create native woods, trees and their wildlife for the future. We manage over 1,250 sites, including over 200 sites in the South West, and have 500,000 members and supporters.</p> <p>We welcome the opportunity to comment on the Pre-submission draft Wiltshire Housing Site Allocations Plan and are pleased to be working with you in the area.</p> <p>The Woodland Trust welcomes the references to the protection of existing trees and hedgerows in Wiltshire. This is particularly important given the scale of housing development which is being allocated to sites.</p> <p>The Woodland Trust believes that trees and woods can deliver a wide range of benefits, and this is strongly supported by current national planning policy. Trees & woods can play a significant role in sustaining the landscape scale connectivity that underpins ecological resilience and helps combat climate change effects.</p> <p>We note reference at 5.8 to mature hedgerows and trees, including a veteran oak. The length at which veteran trees take to develop and evolve provide varied and unique habitats for fauna and flora species which cannot afford to be lost. Their position in the landscape often creates vital connectivity within an increasingly fragmented environment.</p> <p>The Housing White Paper (February 2017) at section A.38 (p77/78) brackets ancient woodland and aged or veteran trees alongside protection for SSSIs, National Parks and Greenbelt, stating: 'Ancient Woodland and aged or veteran trees are irreplaceable habitats and we consider it important that national policy reflects the need to protect them'. Full Housing White Paper is at: https://www.gov.uk/government/publications/fixing-our-broken-housing-market</p> <p>When considering protection of trees and hedgerows it is essential to consider the extent of root area to ensure that adequate buffers are provided. We recommend a minimum of 15 times the diameter or 5 metres beyond the crown, whichever is greater. Further, we strongly welcome the commitment to 'enhance with additional native planting.'</p> <p>Protection of existing trees and woods, plus the addition of new and diverse woodland creation to buffer and extend our depleted and fragmented habitats can all significantly help resilience and help combat climate change effects.</p> <p>Woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits: -these include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).</p> <p>Our publication Residential Development and Trees demonstrates the importance of incorporating woods and trees at the early design stage, and how new build can provide opportunities to enhance the natural environment through the delivery of green infrastructure.</p> <p>We hope you will take these comments into consideration as part of the consultation process. If you have any queries, please do not hesitate to get in touch via this email address governmentaffairs@woodlandtrust.org.uk</p>				

	The Woodland Trust looks forward to continuing to work with Wiltshire Council, and other partners, in the management of our existing 14 sites across the county, and the planting of new trees and woodlands.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1823	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: W&W Report A3 - Final_Ir Rowbarrow_Representation Form_Final</p> <p>Proposed allocation: the proposed allocation of Land at Rowbarrow under Policy H4 is supported in principle. This follows the owners taking pre-application advice from Wiltshire Council following the approval of three earlier phases of residential development. Guidance has also been followed from the 2005 Development Brief and guidance in this Draft Plan.</p> <p>Land ownership: the site is the freehold ownership of MN, PA &RC Tilley). The adjoining land to the north and east has already been built out by Persimmon Homes. We can confirm on behalf of the landowners that the subject site is available for early residential development subject to a subsequent planning application. Should the allocation be confirmed in the Submission Plan the landowners and their agents intend to coordinate further more detailed work regarding the site promotion in consultation with the Council.</p> <p>Please see accompanying Supporting Statement and specialist reports on:</p> <ul style="list-style-type: none"> · Ecology · Landscape · Heritage · Transport · Flood Risk and Utilities <p>Policy H3.4 and Paragraph 5.146: the land area extent set out in Policy H3.4 and Paragraph 5.146 is incorrectly stated as 6.1ha. The correct extent of the allocation site is 5.56ha. This is shown on the attached Site Location Plan and in the Masterplan within the Supporting Document. The buffer surrounding the neighbouring development is not included in the site.</p> <p>9.3 Sustainability Policy CP41 of the Wiltshire Core Strategy deals with sustainable construction and low carbon energy. If the site is allocated, a subsequent application would be accompanied by an Energy statement which would address these issues in relation to the scheme proposed at that time.</p> <p>9.4 Section 106 Contributions Other matters may also have to be addressed via a Section 106 Agreement. For example: Affordable Housing – The pre-app letter from the Council indicates that policy CP 43 of the Core Strategy requires a 40% on site affordable housing provision at nil subsidy. For a scheme of 100 dwellings this would equate to 40 affordable dwellings. This is shown for illustrative purposes on the masterplan. Education – In terms of education provision, the requisite financial contributions based on the Education Department’s cost multipliers per pupil place would be offered via a Section 106 Agreement, for both primary and secondary provision. These contributions could be used in locations of</p>				

	<p>the Education Authority's choice. The pre-app letter suggested current projects that could be funded would be expansion of St Martins CE at primary level and Sarum Academy at secondary level. One option could be for primary school contributions from this development to be channelled towards the primary school which we understand Persimmon Homes is proposing on land to the north of Downton Road, within walking distance of the site. That site is being promoted separately by Persimmon in this consultation.</p> <p>Open Space and Community – A significant amount of this site will be provided as public open space with footpaths for dog walking etc. Equipped play areas will also be provided in accordance with the Council's standards.</p> <p>9.5 Community Infrastructure Levy (CIL) The requisite CIL payment would be made, on the granting of planning permission, in accordance with the Council's latest CIL Charging Schedule</p> <p>9.6 Environment Impact Assessment (EIA) The pre-app letter suggests that as the neighbouring housing development was the subject of an EIA, a planning application will need to be screened and possibly an EIA addendum submitted. If the site is allocated a formal screening opinion will be sought well in advance of the submission of a planning application</p> <p>10.0 Conclusions Based on an objective assessment, Wiltshire Council has allocated the site in the Draft Wiltshire Housing Site Allocations Plan, currently being consulted upon. Because of potential constraints, it only allocates the site as suitable for 100 dwellings. Pre-application advice has been received from Wiltshire Council and this has been taken into account in formulating the illustrative proposals contained in this document. A development brief was prepared for The Rowbarrow / Downton Road area in 2005. Subsequent neighbouring housing development was developed taking this into account. Proposals now put forward have similarly also had regard to the brief. The illustrative masterplan has been formulated in order to achieve a sensitive and sustainable development taking on board guidance and policy. A series of reports were commissioned to support the draft allocation and to inform the illustrative masterplan. Other issues highlighted in the pre-application guidance letter have also been considered. On the basis therefore that: – the draft allocation has been formulated by the Council on the basis of an objective assessment; – this supporting document has gone a stage further and assessed pre-application guidance, Local Plan policy, government planning guidance and specialist consultant reports; – an illustrative masterplan has been prepared which demonstrates a sensitive and sustainable development can be achieved on the site, relating well to existing housing development, whilst not adversely affecting either the landscape or heritage assets, It is respectfully requested that Wiltshire Council confirms the allocation of the site for 100 dwellings in the Submission version of the Plan and extend the settlement boundary accordingly.</p>
<p>Attached files (Please see Objective)</p>	<p>4722601 / 4768358</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.</p>

Comment ID:	1824	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT: Ecological appraisal Land at Rowbarrow_08.09.17</p> <p>8.1 Ecology</p> <p>The conclusion of the Ecology Appraisal prepared by Lindsay Carrington Ecological Services is as follows: The site lies within 0.6 kilometres of River Avon SAC and River Avon System SSSI. The site was considered to support habitats of ecological importance, including:</p> <ul style="list-style-type: none"> • Foraging and commuting routes for bats in the form of hedgerows and open grassland. • Trees and shrubs on site which provide potential habitat for nesting birds. • Semi-improved grassland and hedgerow edge habitat for reptiles. <p>The following mitigation is suggested:</p> <ul style="list-style-type: none"> • A drainage scheme will need to be incorporated with surface water run-off management that will ensure any foul water is directed away from the River Avon and there will be no hydrological changes caused by the development. • A Construction Management Statement (CMS) will be prepared and implemented to protect the River Avon SAC and SSSI and the Lime Kiln Chalk Local Wildlife Site on the other side of Odstock Road. • Leaflets will be distributed to the new homeowners to inform them of the sensitivity of the SAC. New residents will be encouraged to utilise spaces away from the SAC. • Whilst the site is considered to offer low foraging potential for bats further surveys are recommended. • All vegetation clearance should be conducted outside the bird nesting season and ecological enhancement measures should be carried out. • Whilst no evidence of reptile presence was identified on site, the site was assessed as supporting habitat with the potential to support reptiles. <p>A further targeted survey is recommended.</p>				
Attached files (Please see Objective)	4722572				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.				

Comment ID:	1825	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>8.2 Landscape SEE ATTACHED REPORTS: Land at Rowbarrow - Landscape and Visual Context - 20170911 Salisbury Rowbarry LVIA Figures - 20170911_Part1 Salisbury Rowbarry LVIA Figures - 20170911_Part2 Salisbury Rowbarry LVIA Figures - 20170911_Part3 Salisbury Rowbarry LVIA Figures - 20170911_Part4 Salisbury Rowbarry LVIA Figures - 20170911_Part5 Salisbury Rowbarry LVIA Figures - 20170911_Part6</p> <p>The summary of the Landscape & Visual Impact Assessment prepared by Savills is as follows: It is acknowledged that the site occupies an elevated and open area of land that is distinguishable from as far away as Old Sarum to the north and Pepperbox Hill to the south. Given the panoramic nature of these views however, the sensitive development of the site need not result in any adverse visual effects. The site provides the opportunity to create a softened urban edge to the city, retaining a shelterbelt of mature beech trees, as well as an area of open space that could be enhanced with the restoration of chalk grassland. This open space would also include a small area of the Woodbury Ancient Villages Scheduled Ancient Monument, providing the opportunity for enhanced interpretation.</p>				
Attached files (Please see Objective)	4768308 / 4768315 / 4768318 / 4768322 / 4768325 / 4768326 / 4768327				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.				

Comment ID:	1826	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT Land at Rowbarrow - Heritage Appraisal Final</p> <p>8.3 Heritage</p> <p>The Heritage Appraisal prepared by CgMs Heritage summaries the potential impacts on the historic environment. It considered impacts on both buried archaeological remains and built heritage.</p> <p>It notes a small part of the site lies within the boundaries of the Woodbury Ancient Villages Scheduled Monument (SM). Whilst direct harm to the SM could cause substantial harm, the report says this could be completely eliminated by completely avoiding any built development within the area of the SM.</p> <p>Previous archaeological investigation indicates a high potential for archaeological remains within the site but impacts could be mitigated by a programme of archaeological works.</p> <p>The report also states that development within the site has the potential to impact on the setting of the Woodbury SM. However it states that the site only forms a small part of the setting of this monument, and the setting is not a primary contributor to the SM's significance. Therefore it is considered that any impact on the setting would cause less than substantial harm to the significance of the SM.</p> <p>It is also stated that it is not considered that any proposed development could cause any measurable harm to the significance of Old Sarum SM on the grounds of distance between the SM and the site (5km+) and the panoramic extent of Old Sarum's setting, of which the site only forms a tiny part.</p> <p>It is further stated that no designated built heritage assets (listed buildings, registered Parks and gardens, conservation Areas) within 1km of the site would be impacted by the proposed development.</p> <p>In respect of Salisbury Cathedral (1.2 km distant), the changes in setting would not be considered to amount to more than a negligible degree of harm to the asset's significance, which can be balanced by some mitigation measures in the development design.</p> <p>The report notes that no issue of impacts on buried archaeology or the setting of the Woodbury SM or any built heritage assets were considered as barriers to development of recent housing developments adjacent to the site. Any such issues arising as a result of development proposals within the site could similarly be dealt with via a programme of pre-determination works and suitably worded planning conditions, and should not preclude development.</p>				
Attached files (Please see Objective)	4768344				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.				

Comment ID:	1827	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT: LPTR3 Land at Rowbarrow - Land Promotion</p> <p>8.4 Transport</p> <p>Paul Basham Associates were commissioned to prepare a Transport Report to assess the site in highways terms. Its summary conclusions are as follows:</p> <ul style="list-style-type: none"> • The location of the site in relation to both the local pedestrian and cycle network and the existing public transport infrastructure presents a good opportunity to promote sustainable travel and encourage sustainable development. • The trip generation of a potential 100 dwelling development has been calculated...the site would generate 52 trips in the AM peak period, 51 trips in the PM peak period and 449 trips across a 12 hour day. • The trips have been distributed on to the local road network ... If this site were allocated, this location in relation to the strategic network provides an opportunity to reduce the number of vehicles travelling through the New Bridge Road roundabouts and into Salisbury City Centre. The trip generation demonstrates that 38% of all development traffic would not be anticipated to use either of the Newbridge roundabouts. • Access to the site would be most appropriately served via a right turn lane which... will provide the opportunity to improve pedestrian connectivity by providing a pedestrian refuge island across Odstock Road. • This report has demonstrated that the site provides a good opportunity to encourage Wiltshire Council to allocate the site in the submission Housing Site Allocations Plan. 				
Attached files (Please see Objective)	4722609				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.				

Comment ID:	1828	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Peter Brett have undertaken a due diligence assessment covering constraints associated to Flood Risk and Utilities associated with the potential residential development of this site. SEE ATTACHED REPORT: 170911_Due Diligence Report_RevB</p> <p>Their summary conclusions were:</p> <p>Flood Risk</p> <ol style="list-style-type: none"> 1. The site lies entirely within Flood Zone 1, the lowest classification of flood risk according to planning policy. The residential development proposals are acceptable within Flood Zone 1. 2. No other significant sources of flooding were found that would affect the proposed development as part of the information gathered as part of this appointment. 3. There are no watercourses or existing public surface water sewers within the vicinity of the site in which surface water discharges surface water on site via infiltration. 				
Attached files (Please see Objective)	4722617				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.				

Comment ID:	1829	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED REPORT: 170911_Due Diligence Report_RevB Utilities 1. Existing utility infrastructure is present within the proposed development boundary. A medium pressure gas main in a north to south alignment running parallel to Odstock Road. A 3m easement will need to be adhered to and considered within future masterplanning if the gas. 2. An existing electricity sub-station (Rowbarrow S/S) is located to the north of the proposed development boundary provided to us by Savills. The sub-station is sufficiently outside of the indicative development boundary such that it would not represent a constraint to development proposals. 3. Dependent on the location and detailed design of the development access junctions, the SSEN LV cables and Openreach ducts within the existing footways may need to be diverted or protected.				
Attached files (Please see Objective)	4722617				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.				

Comment ID:	1830	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>9.2 Noise and Air Quality</p> <p>The pre-app letter mentions potential issues of noise and air quality impacting on the proposed housing from roads, the commercial use to the south east and the park and ride site further to the south east and from the District Hospital. With the proposed layout being tucked in adjacent to the existing housing development, these issues should not be too dissimilar to when considered for the original development. Additional planting will be proposed on boundaries particularly to the south and west which should assist with both issues. The commercial use to the south east was originally a milk depot which had the potential for noise but this has now been replaced by caravan storage. Noise should not be a problem from the park and ride which only operates for limited hours. Any potential air quality issues from roads, park and ride or the hospital would be addressed by the commissioning of an air quality report if the site is allocated and prior to the submission of a planning application.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.				

Comment ID:	1831	Consultee MN, PA & RC Tilley	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1130961	Person ID: 556489	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT ON SUPPORTING INFORMATION</p> <p>9.1 Amenity and Design</p> <p>An illustrative masterplan accompanies this submission. Regard has been had to the existing residential properties to the north and east. There is an existing landscape buffer to these dwellings giving them protection. On top of this, due regard has been had to the height of proposed dwellings and face to face and gable to face distances to minimise overlooking and overshadowing. Pedestrian and cycle linkages between new and existing have also been taken into account in the layout.</p> <p>Because the location of the development it is noted that a high quality design will be required. To this end, the illustrative masterplan keeps proposed housing to the lower parts of the site and has dwellings fronting an area of public open space of the higher parts of the site which present an interesting face to those using the public open space.</p> <p>There would be more opportunity to discuss the layout of housing and design issues, if the site is allocated for development, by means of further pre-application discussions and community engagement.</p>				
Attached files (Please see Objective)	4768358				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To expand on any of the detailed matters covered in the in this form and the Supporting Statement should any issues arise.				

Comment ID:	1832	Consultee Neil Cowley Castlewood Properties Ventures Ltd Person ID: 1130978	Agent Mr David Wetherill Senior Planner Turley Person ID: 1130975	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.2				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>On behalf of our client, Castlewood Properties Ventures Ltd., we write to provide representations to the pre-submission draft Wiltshire Housing Site Allocations Plan consultation.</p> <p>This response has been prepared with regard to our client's land interests at land off the A363 at White Horse Business Park. Our client's site is located outside of, but adjoining, the existing settlement boundaries of Trowbridge and North Bradley.</p> <p>Trowbridge is a Principal Settlement, situated within the Trowbridge Community Area and located in the North and West Wiltshire Housing Market Area (HMA).</p> <p>The scope of these representations is focused on the proposed strategy for the North and West Wiltshire HMA, the Trowbridge Community Area and Trowbridge specifically. Accordingly, any comments or observations made are done so without prejudice to any future representations.</p> <p>The Intention of the DPD and Spatial Strategy</p> <p>The spatial strategy within the DPD is, in summary, to allocate enough housing sites to fulfil the 'residual' housing requirement set by the 2015 Wiltshire Core Strategy in each Community Network Area. For the North and West HMA, further housing allocations are identified in the draft Plan at Trowbridge and Warminster (including land off the A363 at White Horse Business Park) identified in the Core Strategy Settlement Hierarchy as 'Principal Settlements' and 'Market Towns' respectively.</p> <p>The second bullet of paragraph 1.1 of the draft Plan states that the purpose of the plan is to:</p> <p>"Allocate new sites or housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the plan period to 2026."</p> <p>Paragraph 1.4 then goes on to reference the Wiltshire Core Strategy's intention to:</p> <p>"...ensure a sufficient choice and supply of suitable sites through the plan period in accordance with national policy..."</p> <p>Paragraph 2.3 then acknowledges the National Planning Policy imperative that:</p> <p>"...the Plan must involve a degree of flexibility and pragmatism to ensure a steady overall supply of enough land for housing development".</p> <p>Five Year Supply and Housing Provision</p> <p>We do not consider that Wiltshire Council can currently demonstrate a five year housing land supply, despite the Council's claimed supply in the North and West HMA of 6.62 years (Topic Paper 3). We note the conclusions of Inspectors at recent appeals in the HMA namely at Forest Farm, Chippenham (ref: 3150514) and the Grange, Hilperton (ref: 3167012) which also conclude that there is currently a five year supply in the North and West HMA. Despite this, the position in the North and West HMA is quite clearly marginal, with the Inspector for example in the Hilperton appeal decision stating that there was a surplus of just 59 dwellings.</p> <p>For the North and West Wiltshire HMA, currently a 5% buffer is applied to the housing land supply to ensure choice and competition in the market for land. Notwithstanding this, there is a strong case that a 20% buffer is also applicable for the North and West HMA given the delivery record set out below (See attached Appendix 1) demonstrating persistent under delivery in 8 of the previous 11 monitoring years (since the beginning of the plan period) and 8 of the past 9 years.</p>			

Based on the findings of the Hilperton Appeal Decision, Wiltshire Council would be unable to demonstrate a five year supply in the North and West HMA with the application of a 20% buffer, and given the above delivery record, the situation can therefore be fairly described as precarious. It is also acknowledged at paragraph 2.14 of the DPD itself that:

“Fluctuation can occur in the delivery of housing but a central objective of the Plan, ensuring surety of supply, is to sustain a ‘five year housing land supply’ over the remainder of the plan period for each of these HMAs.”

Furthermore, the current approach of the DPD wrongly assumes 100% delivery of existing commitments to deliver the ‘residual’ housing requirement, without taking into account any lapse of those planning permissions, and not ensuring a suitable buffer of sites above that residual requirement.

Given the above, and in accordance with the NPPF, we consider the capacity of proposed allocations should be increased. These should contribute to over and above the ‘residual’ housing requirement in the North and West HMA to provide a realistic prospect of achieving the planning supply. This approach will ensure that the plans objective to sustain a five year supply of land across the plan period is met.

Crucially, there would be no planning harm from this approach, as the housing requirement in Wiltshire is a minimum, not a maximum, and cannot therefore be considered a cap to sustainable development.

Site Assessment

The proposed allocation of land off the A363 at White Horse Business Park (at policy H2.2) is supported in principle. The redevelopment of this site for housing would result in a logical extension to the settlement and would not result in any detrimental impacts. Policy H2.2 states the following objectives for the development of the site:

An objective of detailed design and layout will be to retain visual separation of the Town’s urban area from North Bradley village. To achieve this, development proposals would need to be focussed within the north-east of the site, screened with new planting and provide improvements to walking and cycling routes through to the town.

Development of the site would need to retain the distinctive pattern of mature and semi-mature hedgerows and trees and thereby provide a layout that respects the setting of North Bradley village as an important element of detailed design.

Existing hedgerows and trees also provide habitat for protected and non-protected species. These natural features therefore provide wildlife corridors that link habitat features within the local area; in particular, ‘dark corridors’ for foraging bats.

The site is in an area likely to be used by Bechstein’s bats associated with the Bath and Bradford on Avon Bats SAC. Sensitive habitat features on / adjacent to the site include: woodland belts associated with the White Horse Business Park; a network of mature hedgerows/hedgerow trees; and the grounds of Willow Grove. These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux), continuous corridors of native landscaping.

Proposals would need to provide for a high quality, sustainable development that enhances a key gateway approach to the town, whilst protecting the integrity of North Bradley as a village.

In order to facilitate development, appropriate contributions would be likely to be sought to help fund additional local school capacity. Funding contributions may also be sought where needed to increase capacity at local GP surgeries and dentistry at the town.

We consider that the requirement that development proposals need to be focussed within the north-east of the site to be unduly restrictive.

It is noted that the justification for this is to primarily retain visual separation of the Town’s urban area from North Bradley village. It is noted that the Council wish to maintain “visual” rather than “actual” separation, which is the correct approach in terms of maintaining the separate identity of settlements.

We consider that “visual separation” can be maintained with a much more extensive development of the proposed allocation. The key settlement gap between Trowbridge and North Bradley is provided along the road “Woodmarsh”, which forms the gateway into the town. In contrast the gap between North Bradley and the White Horse Business Park to the north east is not as significant, in terms of protecting the integrity of the two settlements. The requirements of the proposed allocation place undue significance on this gap. Our development strategy is to provide a landscape / open space buffer adjacent to A363 / Woodmarsh roundabout, in the north-western corner of the proposed allocation. This will ensure that the key settlement gap between Trowbridge and North Bradley is maintained, and the setting of North Bradley village is appropriately preserved.

It is noted that the site was submitted showing a capacity of 366 dwellings (Site ref 298), and this was revised down to 150 dwelling following the assessment process, which required “mitigation measures to address environmental effects, including effects on heritage assets could be achieved” (Pre-Submission Draft Wiltshire Housing Site Allocations Plan Trowbridge Community Area Topic Paper June 2017).

It is noted that Listed Buildings are located within the southern section of the site, and that these would require appropriate buffers. However the northern section of the site is less constrained and should be developed to the full extent of the red line boundary, excluding the landscape / open space buffer as mentioned above.

Fig 1: Listed Buildings located in southern section of proposed allocation (Source: magic.gov.uk) (See attached Appendix 2)

As a Principal Settlement, Trowbridge is anticipated to be a primary focus for development. Moreover, the role of the town as a significant employment and strategic service centre will be expected to be strengthened over the Plan period up to 2026 and beyond. It should be noted that the growth of Trowbridge is constrained in other directions. In particular, with Green Belt and Flood Zone designations to the north and west of Trowbridge.

Therefore the site should be allocated for a much higher number of dwellings given the sustainable location and relative lack of constraints. The development would not be viewed as a protrusion into the countryside and neither would such an expansion be perceived as diminishing the visual gap between Trowbridge and North Bradley, subject to the open space strategy as outlined above. The development strategy would help to protect the integrity of North Bradley as a village.

The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the allocation, whilst simultaneously providing much greater potential to achieve a sensitively configured design. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space.

Fig 2: Trowbridge planning constraints (Pre-Submission Draft Wiltshire Housing Site Allocations Plan Trowbridge Community Area Topic Paper June 2017, Appendix C) (See attached Appendix 3)

Summary and Proposed Amendments to the DPD

As outlined within the scope of this representation, it is considered that the proposed allocation of additional residential at land off the A363 at White Horse Business Park is consistent with the Core Strategy spatial strategy, and serves to reinforce the ‘Principal Settlement’ status Trowbridge has within the settlement hierarchy. To this extent, the strategy for the North and West Wiltshire HMA and the Trowbridge Community Area is considered logical. Similarly, the principle of developing land off the A363 at White Horse Business Park site represents a sound and reasonable approach. This is in view of its location and its relatively unconstrained nature, when compared to potential alternative sites at the settlement.

However, the preparation of this DPD gives the Council an opportunity to proactively plan for future requirements, and potentially safeguard against under-delivery in to the future, should the need for additional housing provision be required (i.e. beyond the minimum required by the current Core Strategy). There is therefore an opportunity to counter the prospect of future shortfalls in delivery (which will ultimately need to be addressed), by planning to deliver over and above the Core Strategy minimum requirement.

Taking this into account, and for the reasons explained, it is considered that the site should be allocated for a much higher number of dwellings given the sustainable location and relative lack of constraints. In particular, the northern section of the site should be developed more extensively given the absence of Listed Buildings in this part of the site. A landscape / open space buffer should be proposed adjacent to the A363 / Woodmarsh roundabout. This will ensure that the key settlement gap between Trowbridge and North Bradley is maintained, and the setting of North Bradley village is appropriately preserved.

Accordingly, we consider the following points and amendments should be considered in the preparation of the draft Site Allocations DPD:

The spatial strategy for the draft Plan should be re-considered to positively plan for the allocation of further sites and increase the size of proposed allocations, particularly where this does not result in substantively different levels of harm and where this facilitates additional benefits; The northern section of the site is less constrained and should be developed to the full extent of the red line boundary, excluding a landscape / open space buffer to be proposed adjacent to the A363 / Woodmarsh roundabout in order to safeguard the visual gap. The wording of proposed allocation H2.2 should be amended to delete the following sentence “development proposals would need to be focussed within the north-east of the site”, as this is unduly restrictive. The setting of North Bradley village can be appropriately preserved with our proposed development strategy.

The settlement boundary should be amended to reflect the revisions to the boundary of the proposed allocation.

	<p>We trust that these comments are helpful, and we look forward to participating in the next stages of the Plan. In regard to the next stages of the Plan, we request to be notified of the following: The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination; and That the Inspector's Report (including any recommendations) into the examination of the Wiltshire Housing Site Allocations Plan has been published. If you would like to discuss our comments or require any further clarification, please do not hesitate to contact us.</p>
Attached files (Please see Objective)	4721092 / 4721094 / 4721101
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1833	Consultee Mrs M L Surry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105334		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. For the last 5 years I have suffered from severe depression and anxiety, and have been under the care of the mental health care team for the majority of this time. I find extremely difficult to go far from my home, and the above mentioned land has been an essential part of me being able to access recreation close to home, when family or neighbours have been able to accompany me on walks. It is well documented that fresh air and exercise is of benefit to everybody's mental health, whether or not they are suffering from a related illness. The removal of this area will have a detrimental effect on my mental health, as I will be unable to access similar recreational spaces which are further away.</p> <p>The age demographic of residents in the nearby bungalows, is at the upper end of age scale. Again, it is vital for these people, some who have limited mobility, to be able to access a recreational area which is close to their homes. They have been able to do so for many years, and it would be criminal to remove this facility in order to build housing, when there are many brownfield sites available in Trowbridge, which would not involve the loss of recreational space.</p> <p>The field system is a recognisable part of our heritage and dates back hundreds of years in its current form. The land has been used by many generations for its current use of farming and recreational space and is a valuable and valued asset to the local community.</p> <p>The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. There is no need to forever lose this valuable space.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1834	Consultee Mrs M L Surry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105334		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	it would be criminal to remove this facility in order to build housing, when there are many brownfield sites available in Trowbridge, which would not involve the loss of recreational space. Housing on this site would not only contradict government policy of building on brownfield sites in preference to Greenfield, but would cause massive problems in its creation and existence for current residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1835	Consultee Mrs M L Surry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105334		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Given that much of the building would take place in an area of notified flooding and standing surface water, the existing residents would have their property seriously threatened by an increased risk of flooding.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1836	Consultee Mrs M L Surry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1105334		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site is also on the “fly-past” route taken by the protected bats which nest at the Tythe Barn in Bradford on Avon, and the actual effect of this being destroyed to build housing cannot be categorically known.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1837	Consultee Mr Graham Bye	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1130991		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I consider this proposal to be wrong on a number of counts: Danger of having extra vehicles pulling onto the B3098 We are a village community and don't have the infrastructure for any new development This would be totally out of character with the village. We are a village not a town. Why do you want to ruin a village with this unwanted development, nobody wants it.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I would like to have my say				

Comment ID:	1838	Consultee Steven Barkwill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130993	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Proposed erection of houses adjacent to Boundry Walk and postcode BA140JS</p> <p>I write in connection with the above planning application. My Wife and I have examined the plans and know the site well. We wish to object strongly to the development of these houses in this location.</p> <p>We live in Westmead Crescent, which is directly opposite the proposed planning site and know how much these fields are valued by locals for recreational purposes including, hiking, dog walking, jogging, kite/gliders flying, picnics - to name a few. Building on this site would greatly restrict the access to greenfield sites by the hundreds of people living in Silver Street Lane and surrounding areas.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1839	Consultee Steven Barkwill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130993		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We also believe that these fields form part of a wildlife corridor from the Westbury area to Southwick Country Park (and beyond). We have personally sighted many different types of wildlife in these fields, including bats and deer which we have seen crossing Frome Road at night from the fields in question into Southwick Country Park.</p> <p>Southwick Country Park itself is currently home to woodpeckers, slow worms, buzzards, water voles, tadpoles, rabbits and many more types of wildlife. These animals need green spaces and corridors to enable migration, colonisation and interbreeding of plants and animals.</p> <p>The loss of these valuable greenfield sites and corridors leads to a break down in ecological processes such as species migration, dispersal, recycling of nutrients, pollination of plants and other natural functions required for ecosystem health. The likely result is severe biodiversity decline and local extinction of sensitive species.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1840	Consultee Steven Barkwill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130993		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	We also believe that building on these fields, along with the other proposed planning sites in and around Southwick, will put even more strain on local schools, services and amenities.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1841	Consultee Steven Barkwill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130993	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is also the issue of encroaching into the small green space that currently separates Southwick and North Bradley as villages. We urge you to reconsider building on this site and will continue to oppose the plans until a decision has been made.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1842	Consultee Wendy Lindley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131000	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I object to the proposed 740 homes on Netherhampton Road, Harnham and 100 new homes on Rowbarrow, Harnham on the following grounds :- TRANSPORT - There is already heavy traffic and rush-hour congestion along Netherhampton Road, Harnham Gyratory, Newbridge Road, Coombe Road and Downton Road caused by local and through traffic. Recent road works highlighted this with grid-lock throughout Salisbury. There is limited public transport to service the areas and Salisbury Park and Ride is ineffective. Please can you note and represent my objection.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1843	Consultee Wendy Lindley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131000	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object to the proposed 740 homes on Netherhampton Road, Harnham and 100 new homes on Rowbarrow, Harnham on the following grounds :-</p> <p>EMPLOYMENT – If these proposed new houses are built where will the new residents work? Many businesses have left Salisbury and few new ones arrive. The city is becoming a dormitory town.</p> <p>Please can you note and represent my objection.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1844	Consultee Wendy Lindley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131000	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I object to the proposed 740 homes on Netherhampton Road, Harnham and 100 new homes on Rowbarrow, Harnham on the following grounds :- SHOPS - Salisbury "town" is in decline. The old bus station and disused offices are being resurrected as homes for the elderly. CRIME - We have no Police Station, limited CCTV and minimal policing mainly by PCSO's, Custody Officers and Private Security Officers. HEALTH - Our hospital was unable to cope over the last mild winter. Currently under pressure and installing Portakabins to help cope with 4,000+ military personnel and their dependents now arriving in Tidworth the addition of a potential 3,000 new residents in Harnham will see the situation deteriorate. Doctors surgeries in Salisbury are merging amidst a shortage of GP's. Please can you note and represent my objection.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1845	Consultee Mr Anthony Flanagan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131014	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	While I appreciate that more housing may be needed in Salisbury I think that 640 new dwellings on the outside of the town is excessive – this will create much more traffic down the Netherhampton Road, which is already too busy. These new houses will likely be bought by young families who need to get to work. Surely you need to be encouraging people to live in the town where they don't need to add more to the traffic throughout. Please consider reducing the size of this development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I'm happy to be consulted on this matter, I enjoy living in Salisbury and don't want it to be ruined.				

Comment ID:	1846	Consultee Mr Anthony Flanagan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131014		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Where do you expect all these people to be employed? The council has already agreed to redundant office space in town being converted into retirement homes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I'm happy to be consulted on this matter, I enjoy living in Salisbury and don't want it to be ruined.				

Comment ID:	1847	Consultee Mr David Palmer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126111		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan fails to sufficiently address employment, traffic, educational and health needs and other amenities. It is not sustainable development. See above				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1848	Consultee Mr David Palmer	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126111	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not consistent with National Policy. It incorrectly identifies all sites within Settlement Boundaries as windfalls. It fails to take into account and give realistic and proper weight to windfall completions. The National Policy requires planning policies and decisions to encourage the effective use of land by re-using land. It is simply not good enough to hide behind the obvious conclusion that, for developers, the development of brownfield and infill sites is unattractive . Allocating greenfield sites is clearly the easy option as far as the Council is concerned.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1849	Consultee Mr David Palmer	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126111	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Three sites have been included which are contrary to the Council's Core Strategy. The Core Strategy policy states the need to protect open countryside between the Trowbridge and the neighbouring villages. It recognised that the villages each have a separate and distinct identity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1850	Consultee Mr David Palmer	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126111	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are sufficient sites (identified by Trowbridge Town Council and others) to meet the Council's requirements without permitting development of what is left of the open land between Hilperton and Trowbridge. Open countryside should be maintained to protect its character without reducing it - and in some places to just one insignificant small field/open space.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1851	Consultee Mr David Palmer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126111		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Hilperton Gap is the only remaining green lung on that side of Trowbridge, its diagonally opposite equivalent being the Southwick Country Park. The Gap is criss-crossed by numerous footpaths and a bridleway well used by local residents for decades. It should be allocated for use similar to that of the Country Park.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1852	Consultee Mr David Palmer	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126111	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan fails to give proper weight to brownfield sites of which there are many in Trowbridge town centre and which are capable of providing a large proportion of the supply needed, the Bowyers site being the most obvious. Trowbridge town centre is part derelict and in dire need of regeneration.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1853	Consultee Mr David Palmer	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126111	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is wrong to allocate new greenfield sites when the Ashton Park site has not been built out for whatever reasons.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1854	Consultee Mr Francis Chalk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126184		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. These fields have been used by many generations for farming and as a recreational space; they are a valuable and valued asset to the local community. I regularly walk my dog on these fields; indeed the proximity of these fields to where my family and I live was one of the reasons we chose to buy our house on Balmoral Road. I am not alone in using these fields for dog walking; there are scores of people who do likewise, many of them elderly. Walking on these fields, with or without dogs, is good exercise & is a very sociable experience for all concerned. To lose this valuable recreation space will have a real impact on the wellbeing of many people. We've already lost a large portion of the countryside with the installation of the solar panels near Axe & Cleaver Lane, so the area to walk in will be very small if houses are built on these fields and on the proposed development site in Southwick.</p> <p>Do these proposed houses come with any guarantee or firm plan for infrastructure such as schools? I have seen no proposals for this. It's no good building houses if there isn't the infrastructure to support them.</p> <p>I urge you not to include site 3565 in the Trowbridge Site Allocation Plan. If you do we will lose a much loved part of the countryside that is used on a daily basis by a great number of people. It will have a really detrimental effect on our day to day lives and will make our neighbourhood a diminished place.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1855	Consultee Mr Francis Chalk	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126184	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. Housing on this site would not only contradict government policy of building on brownfield sites in preference to Greenfield, but would cause massive problems in its creation and existence for current residents.</p> <p>Why aren't the existing brownfield sites being used to build houses, such as the old West Wiltshire DC site on Bradley Road or the old Bowyers site? Plus I understand that developers hold granted planning permission for 5,096 dwellings in Trowbridge but aren't building on those sites. Is this because they prefer to have their buildings on attractive green field sites so that they will attract more money? It shouldn't be up to the developers to dictate where they will build; Wiltshire Council should instruct them where to build.</p> <p>I have been informed that expansion into the countryside is against the Wiltshire Strategic Plan. If this is the case, how can this proposed development be justified? It also seems that Trowbridge has to take a disproportionate number of houses for the Wiltshire housing allocation when compared to other towns in the county. How can this be justified? Furthermore I understand that the leader of the council Jane Scott has publicly spoken against developer lead house building. Well isn't this a perfect example of that?</p> <p>I have been informed that there is no active support for this site from the local Council, the Environment Agency, Natural England, Historic England or the County Planning Archaeologist despite such active support being voiced for other sites within the Proposal. In fact in a response from Natural England the case officer said :</p> <p>"I have briefly looked at the conclusions/recommendations in the Trowbridge Community Area Topic Paper and have noted that Site 3565 (Land east of the A361 at Southwick Court), is considered to be a less sustainable options for development, and that five moderate adverse effects have been identified in relation to this site."</p> <p>I urge you not to include site 3565 in the Trowbridge Site Allocation Plan. If you do we will lose a much loved part of the countryside that is used on a daily basis by a great number of people. It will have a really detrimental effect on our day to day lives and will make our neighbourhood a diminished place.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1856	Consultee Mr Francis Chalk	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126184	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. Given that much of the building would take place in an area of notified flooding and standing surface water, the existing residents would have their property seriously threatened by an increased risk of flooding. I have seen the extensive flooding on these fields on a number of occasions since we moved here in 2007; much of the area of these fields is not suitable to build houses on because of this.</p> <p>I urge you not to include site 3565 in the Trowbridge Site Allocation Plan. If you do we will lose a much loved part of the countryside that is used on a daily basis by a great number of people. It will have a really detrimental effect on our day to day lives and will make our neighbourhood a diminished place.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1857	Consultee Mr Francis Chalk	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126184	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. I am also concerned about access to this site as I feel it is quite likely this will be via Balmoral Road. This will greatly increase the traffic flow on what is currently a very quiet road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1858	Consultee Mr Francis Chalk	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126184	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. There will also be the issue of having to remove a number of mature trees and hedgerow, whether the access is via Balmoral Road or any of the possible alternatives.</p> <p>I urge you not to include site 3565 in the Trowbridge Site Allocation Plan. If you do we will lose a much loved part of the countryside that is used on a daily basis by a great number of people. It will have a really detrimental effect on our day to day lives and will make our neighbourhood a diminished place.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1859	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Trowbridge Community Area housing allocations	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Hilperton Parish Council is of the opinion that the Wiltshire Council (WC) Draft Wiltshire Housing Site Allocations Plan is unsound for the following reasons:- Your method of calculating housing requirements for Housing Market Areas (HMA) is improperly based and contains errors. It seems that WC is using this exercise to improperly avoid due democratic process, and to engineer objectives beyond those required of a housing site allocations plan. An example is the allocation of land for a further 800 homes to Trowbridge (in addition to the 4,790 completed and committed and a further 1,000 'delayed') despite these being in excess of HMA housing needs. This seems to be in pursuit of an ambition, unrelated to housing requirements, to create an ever larger 'Greater Trowbridge' urban settlement.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1860	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Trowbridge Community Area housing allocations	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>You have failed to encourage effective use of brownfield sites in accordance with NPPF Core Principle 8. NPPF Core Principle 8 requires planning authorities to “Encourage effective use of land by reusing Brownfield land.” and in Topic Paper 3 you state “during the Wiltshire Core Strategy period (2006-2015) delivery of brownfield sites have contributed 29% of all housing completions”. You go on to correctly note the much greater emphasis on brownfield in national policy, particularly in the Housing and Planning Act 2016 and the Housing White Paper of February 2017.</p> <p>However, beyond these token acknowledgements, your plan fails to consider any measures to encourage effective use of brownfield, especially in the principal settlement of Trowbridge which has acres of derelict former industrial land.</p> <p>Key documents fail to address brownfield properly or at all. For example, Topic Paper 4 states that “There are significant brownfield opportunities that are a priority for redevelopment, although this source of housing land is ultimately a modest proportion of overall supply”. You willingly fail to understand that, while this might be true of Wiltshire as a whole, it is far from true for the specific urban context of Trowbridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1861	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?											
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?		No									
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared											
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Community Area housing allocations		Justified	Effective										
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		You have failed to include specifically identified sites, which as such are not defined by the NPPF as 'windfall' and are located within the Trowbridge Settlement Boundary. Namely:- <table style="width: 100%; border: none;"> <tr> <td style="padding-left: 20px;">The former West Wilshire District Council Offices, Bradley Road</td> <td style="text-align: right;">70 dwellings</td> </tr> <tr> <td style="padding-left: 20px;">East Wing/Trowbridge Hospital/Margaret Stancomb School</td> <td style="text-align: right;">300 dwellings</td> </tr> <tr> <td style="padding-left: 20px;">The 'Bowyers' site adjacent to Trowbridge railway</td> <td style="text-align: right;">250 dwellings</td> </tr> <tr> <td style="padding-left: 20px;">Ashton Street Centre</td> <td style="text-align: right;">70 dwellings</td> </tr> <tr> <td style="padding-left: 20px;">Conversion of 'The Pavillions', White Horse Business</td> <td style="text-align: right;">130 dwellings</td> </tr> </table>				The former West Wilshire District Council Offices, Bradley Road	70 dwellings	East Wing/Trowbridge Hospital/Margaret Stancomb School	300 dwellings	The 'Bowyers' site adjacent to Trowbridge railway	250 dwellings	Ashton Street Centre	70 dwellings	Conversion of 'The Pavillions', White Horse Business	130 dwellings
The former West Wilshire District Council Offices, Bradley Road	70 dwellings														
East Wing/Trowbridge Hospital/Margaret Stancomb School	300 dwellings														
The 'Bowyers' site adjacent to Trowbridge railway	250 dwellings														
Ashton Street Centre	70 dwellings														
Conversion of 'The Pavillions', White Horse Business	130 dwellings														
Attached files (Please see Objective)															
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?															

Comment ID:	1862	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Trowbridge Community Area housing allocations	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	You have failed to allocate site 256 south of Green Lane for 167 new dwellings. This site is a logical extension of Trowbridge town which lies between the proposed Trowbridge settlement boundary and Green Lane Wood which acts as an appropriate natural barrier to the urban spread. Further mitigation measures to reduce recreational and other impacts on Bechstein and other bat species in line with existing development permissions and allocations can be satisfactorily achieved.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1863	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>You have failed to allocate site 292 north of Green Lane for 170 new dwellings. This site is a logical extension of Trowbridge town which lies between the proposed Trowbridge settlement boundary and Green Lane Wood which acts as an appropriate natural barrier to the urban spread. Further mitigation measures to reduce recreational and other impacts on Bechstein and other bat species in line with existing development permissions and allocations can be satisfactorily achieved.</p> <p>You have failed to allocate site 292 north of Green Lane for 170 new dwellings. This site is a logical extension of Trowbridge town which lies between the proposed Trowbridge settlement boundary and Green Lane Wood which acts as an appropriate natural barrier to the urban spread. Further mitigation measures to reduce recreational and other impacts on Bechstein and other bat species in line with existing development permissions and allocations can be satisfactorily achieved.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1864	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Community Area housing allocations		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		You have failed to allocate site 3247 Biss Farm for 210 new dwellings. This site isa logical extension of Trowbridge town which lies between the proposed Trowbridge settlement boundary and the Ashton Park allocation. Part of the Ashton Park development, closest to White Horse Business Park, could be reallocated for employment uses to compensate for the loss of this area as an employment allocation. This would also have the benefit of not reducing the build rate at Ashton Park within the plan period.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1865	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Trowbridge Community Area housing allocations	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>You have ignored Planning Examination findings the basis for which have not changed. Over ten years ago the Planning Inspector determined, in relation to the Hilperton Gap, in his West Wiltshire District Plan First Alteration Inspector's Report:-</p> <p>"2.2.47. This area so contained comprises a series of small fields, separated by hedges, and crossed by a number of public and other footpaths. From my visits to this locality I consider that at present this area appears as a reasonably homogenous tract of open land, although there are subtle differences in landscape character within it. It is partly in agricultural use and partly consists of unused grassland, but there are views of Hilperton and the edge of Trowbridge from within and across it. I consider that the properties in Wyke Road, Victoria Road and Albert Road form an obvious definition to the eastern edge of Trowbridge hereabouts...</p> <p>2.2.48. I appreciate that the proposed Hilperton Relief Road is intended to cross this land [the Gap] broadly from north-west to south-east. Although the precise alignment of the road is not formally before me, a draft scheme has been drawn up and was presented to the inquiry. From this and my own observations, I cannot imagine that substantial earthworks would be needed to accommodate the road, wherever its precise route lay, so that its impact in the landscape might not be great. In these circumstances I do not believe that it would, if built here, appear as a more convincing boundary to the town than the existing development...</p> <p>2.2.49. An alternative boundary to the town policy limit further to the east would enable development to take place on the land so enclosed. This would extend Trowbridge into open land having a reasonably pleasant appearance and would in my opinion harm the semi-rural character and appearance of the area as open fields were replaced by built development of one form or another. It would also erode the gap between Trowbridge and Hilperton..."</p> <p>These comments relate specifically to sites 263 and 297.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1866	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge Community Area housing allocations			Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>You have made unrealistic and unsubstantiated assumptions on building density.</p> <p>You have proposed sites 263 and 297 for housing stating that these would provide 205 dwellings after numerous mitigation measures. These sites have a combined area of approx. 20.5 ha and thus provide a net housing density of only 10 dwellings per hectare.</p> <p>This is only about one third of typical modern development density and indicates a highly wasteful use of precious green field space.</p> <p>HGT Developments llp has applied to develop houses on the northern part of site 263, an area of about 8.5ha partially in a flood zone. After over 18 months of negotiation with WC they are now asking for approval for 170 dwellings. This is a density of 20 dwellings per hectare which would provide, were it to be approved, 80% of the dwellings expected of site 263 on 40% (and the most difficult part) of the site.</p> <p>WC owns site 297 and has claimed (in Wiltshire SHLAA Appendix 3 for Trowbridge community area) that it alone could accommodate 74 dwellings.</p> <p>Your calculations are clearly unsound. Either only about one third of these sites is needed to provide the 205 dwellings you claim is required, or you have deliberately underestimated the number that will be built in an obvious attempt to assuage fierce local opposition to development in the Gap</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1867	Consultee Mrs. Marylyn Timms Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Hilperton Parish Council Person ID: 547867		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Trowbridge Community Area housing allocations	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	You have failed to reallocate housing figures within the North and West HMA from Trowbridge to other community areas. Other towns have demonstrated an ability to deliver higher than planned completions up to 2017 and can offer sustainable development sites in the plan period but you have failed to consider them.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1868	Consultee Lyn Little	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131070	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am expressing concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocation Plan.</p> <p>Together with the 10 dwellings already being built on this site, this represents a near 20% increase in dwellings in the village of Crudwell (currently some 260 dwellings).</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so. However, the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell.</p> <p>A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p> <p>Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So, this aspect of the Plan is not consistent with the Strategy.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met</p> <p>Crudwell is not anti-development; it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan.</p> <p>Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.</p> <p>Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	1869	Consultee Lyn Little	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131070	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am expressing concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocation Plan.</p> <p>Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.</p> <p>Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1870	Consultee Lyn Little	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131070	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am expressing concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocation Plan.</p> <p>Crudwell Primary School is already greatly over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields. The school's ability to expand is not guaranteed</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.</p> <p>Crudwell in not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1871	Consultee Lyn Little	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131070	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am expressing concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocation Plan.</p> <p>There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.</p> <p>Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1872	Consultee Jules Blanch	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131127	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I was born and raised in the village of Crudwell and have chosen to bring up my own children in this community. Both of my daughters attend the village school which is incredible because of its size and ability to nurture the children on an individual basis. There is such a strong sense of community within the village school whereby all the parents and children know each other and therefore look out for each other. As a parent there is a sense of real safety and capacity for the children to be able to enjoy a rural upbringing. This is mostly because of the scale of the community and the school which it serves.</p> <p>I have serious concerns about the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell following the recent approval of 10 new houses. This represents nearly a 20% increase in the population of our village which is completely unsustainable and will have a huge impact on the roads, infrastructure and safety.</p> <p>The government has set out some clear guidelines to local authorities to allow a predetermined number of new dwellings within each Authority area. I believe however that the scale of this permitted development should reflect the size of the community into which it is being proposed. I do not believe that the proposed scale of this development reflect the size of Crudwell and as a result threatens the character of this closely knit community.</p> <p>Clearly a project of this size can have a hugely lucrative outcome for both the landowner and developer and both parties should be given the opportunity to express their moral conscience in terms of what the community will benefit from a development of this project. This could take the form of improvements to the local school, church restoration, flood risk prevention works, drainage improvements, road safety, etc, etc. Planning gains of this kind should be negotiated, agreed and formally tied up in advance of any planning permission being granted.</p> <p>It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1873	Consultee Bovis Homes Person ID: 899628	Agent Mr Des Dunlop Managing Director D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: 'Vision Statement part 1', 'Vision Statement part 2', 'Salisbury - Bovis - Wiltshire Housing Site Allocations Plan - Policy H3.1'</p> <p>Land at Netherhampton Road, Salisbury – Policy H3.1</p> <p>At the outset Bovis Homes support the Council's decision to allocate additional land for housing due to the remaining residual requirement which is not identified within the Core Strategy. However, part of the need to identify additional land in and around Salisbury/Wilton is due to the potential delay in the delivery of a number of strategic sites in South Wiltshire. Bovis Homes is not surprised at the potential non delivery of a number of strategic sites and has previously made representations to the Wiltshire Core Strategy to that effect.</p> <p>Whilst Bovis Homes support the Council's decision to identify land under their control at Netherhampton Road, Salisbury (Potential Site Options 1028) for a mixed use development comprising housing, employment, community and social facilities they are disappointed that not all of the available land is identified for residential development. They consider that there is no justified reason why the additional land should not be allocated, particularly as considerable discussions have taken place with the Council to demonstrate the availability, suitability and deliverability of the site. A Vision Document was produced and sent to the Council to demonstrate that Bovis Homes have instructed a team of consultants to deal with the various issues relating to the deliverability of the site. That document demonstrated that there were no issues which represented a constraint to the development of the site in a timely manner. An update Vision Document is attached which reaffirms the site's deliverability. It is considered that the site is ideally placed to meet part of the additional housing requirement.</p> <p>The site was previously identified by the South Wiltshire Core Strategy as a draft strategic site, which signals the acceptance of the Planning Authority to release it for development i.e. 400 dwellings and 10 hectares of employment land. It was only deleted as an allocation because of a reduction in the overall housing provision for South Wiltshire not because of any site specific concerns, and essentially retains a 'reserve' allocation. Clearly additional land for housing is now required and the entire site is ideally placed to assist in meeting that need because: - (see Vision Statement).</p> <p>In view of the above, the allocation of the land is welcomed and we can confirm that it is available and deliverable within the Plan period. Indeed Bovis would be looking to submit an application as soon as possible.</p> <p>With specific regard to the proposed policy we would comment as follows: -</p> <ul style="list-style-type: none"> i. Approximately 640 dwellings ii. The Vision Statement demonstrates that the site is capable of accommodating up to 640 dwellings. iii. Land for employment (B1, B2 & B8 uses of the Use Classes Order) iv. The Vision Statement and illustrative masterplan have identified an area for employment uses and support is given to the flexibility between the use classes afforded by the proposed wording. However, concern is expressed at the lack of a firm evidence base regarding the quantum of employment land. Objections are therefore lodged to this aspect of the policy. 			

	<p>v. At least 1.8ha for a two form entry primary school along with playing pitches. There are no objections in principle to the development meeting its need for primary education. However, the requirement for a 1.8ha two form entry primary school is beyond that which is justified for the proposed development. Accordingly Bovis object to this requirement.</p> <p>vi. A local centre</p> <p>vii. The submitted Vision Statement shows provision of a local centre within the overall development proposals.</p> <p>viii. A country park of at least 10ha in size with associated parking and facilities. The identified Vision Statement shows provision of at least 10ha of public open space but Bovis would question whether the term 'country park' is appropriate rather it should be renamed as 'public open space'.</p> <p>Recommendations</p> <p>In view of the above, Bovis recommend that: -</p> <p>i. All of the land within their control be identified within the proposed allocation.</p> <p>ii. Object to the proposed provision of a 1.8ha site for a two form primary school which is beyond that required for the proposed development.</p> <p>iii. Object to the level of employment land given the lack of a robust evidence base.</p> <p>iv. Object to the lack of guidance regarding the approval by the Council of any masterplan for the site. The masterplan should be approved as part of any planning application.</p> <p>v. Object to the requirement for a healthcare contribution when there is no evidence base to justify that requirement.</p> <p>vi. Object to the viability assessment with regards the site.</p> <p>vii. Object to the terminology 'country park' and consider it more appropriate to refer to it as 'public open space'.</p> <p>As above.</p>
<p>Attached files (Please see Objective)</p>	<p>4723300 / 4723303 / 4723302</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The issues raised need to be the subject of discussion and debate.</p>

Comment ID:	1874	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site comprises intensively farmed arable land that is in one ownership. The farmland is 'in hand' and not subject to any agricultural tenancies. It is therefore available for development now and is achievable with a realistic prospect for delivery, as the land is in the control of an experienced developer i.e. Bovis Homes.				
Attached files (Please see Objective)	4723303 / 4723302				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	1875	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site is located to the west of the Harnham Business Park which is located within the settlement limits. The existing employment area will form a buffer between the proposed development and existing residential areas to the east. Existing residents will not therefore be directly affected by the proposed development (i.e. by issues of overlooking etc). Although development of the site would not immediately adjoin an existing area of residential development, its location adjacent to an existing employment area, public sports pitches, golf course and racecourse all help to ensure it can be integrated into the community, in a highly sustainable location.				
Attached files (Please see Objective)	4723303 / 4723302				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	1876	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SEE ATTACHED REPORT: Vision Statement pt 1, Vision Statement pt2</p> <p>The site can be satisfactorily accessed through the introduction of a junction to the requisite standards along the A3094 Netherhampton Road. Bovis's retained highway consultants have confirmed that such an approach is acceptable.</p> <p>The site is located by road some 4.8km from the City Centre and Railway Station. However, a more direct route is available via the Tow Path, which is a distance of 2.8km from the City Centre. Accordingly the walking and cycling distance is approximately half the road distance, this should encourage walking and cycling to the City Centre where there is a range of services, community facilities, employment opportunities and public transport.</p> <p>The site is located within 5km (acceptable cycling distance) of a strategic employment site e.g. Southampton Road.</p> <p>Furthermore the site is also within easy walking and cycling distance of a number of other local employment areas at: -</p> <ul style="list-style-type: none"> o Harnham Trading Estate and Harnham Business Park o Ashfield Road Trading Estate o The Malverns, Cherry Orchard Lane o Kingsway Industrial Estate Wilton o Barnack Industrial Estate o Milford Trading Estate, Blakey Road off Tollgate Road <p>The site is therefore in an excellent location to access local employment opportunities by foot or cycle, thereby reducing reliance on the private car.</p> <p>Transport Network Improvements necessary to accommodate the scale of development envisaged.</p> <p>The necessary transport network improvements will be undertaken as part of the proposed development provided they are proportionate to the impact from the proposed development.</p>			
Attached files (Please see Objective)		4723303 / 4723302			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The issues raised need to be the subject of discussion and debate.			

Comment ID:	1877	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SEE ATTACHED REPORT: Vision Statement pt 1, Vision Statement pt2 The site is not within any valued landscape as defined within the NPPF (paragraph 119). The landscape has capacity to assimilate development whilst retaining views of Salisbury Cathedral etc. The Landscape & Visual Impact Assessment has been undertaken and confirms the site's capacity to absorb the quantum of development proposed. The draft policy goes on to state that development will be subject to the following requirements: - • Strategic landscaping and open space provision. All built development to be located below the 75m corridor and a Country Park located on the east and south of the site. The Vision Statement shows that the development will be provided with strategic landscaping and open space. In addition built development will be restricted to below the 75m corridor. Furthermore, as stated above a Country Park is also included as part of the proposals.			
Attached files (Please see Objective)		4723303 / 4723302			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The issues raised need to be the subject of discussion and debate.			

Comment ID:	1878	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED REPORT: Vision Statement pt 1, Vision Statement pt2 The site is not the subject of any ecological designation or designated sites of importance for biodiversity (e.g. SPA, SSSI). The eastern boundary of the site is located 250m to the west of a SSSI. The SSSI is a geological site adjacent to existing residential development to the north. In order to provide a buffer between the SSSI and any new development (in addition to that already provided by the chalk pit) an area of open space could be incorporated along the eastern boundary of the site adjacent to the chalk pit. The site is in arable use. It has been substantially managed and regularly ploughed. Hedgerows are sparse and there are virtually no trees (apart from isolated trees close to the Netherhampton Road) on the site. There is therefore little opportunity for protected species to establish themselves on the site. The proposals would provide an opportunity to provide biodiversity enhancement measures, including the introduction of a wider variety of habitats than currently present across the agricultural land. Measures to safeguard the interest of Hornhill Hill Chalk Pit SSS2 and Harnham Slope Country Wildlife Site. The proposed development is capable of safeguarding the Harnhill Hill Chalk Pit SSS1 and the Harnham Slope Country Wildlife Site.				
Attached files (Please see Objective)	4723303 / 4723302				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	1879	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED REPORT: Vision Statement pt 1, Vision Statement pt2 The entirety of the site is located within Flood Zone 1 and there are no flooding issues. Surface water would be capable of being discharged to the ground via infiltration techniques. The nearby Petersfield Sewage Treatment Works has satisfactory hydraulic capacity to accommodate predicted foul water drainage from the proposed development. Surface water management that achieves equivalent or less than current greenfield rates of run off. The surface water management program will be designed to be equivalent to or less than greenfield run off rates.				
Attached files (Please see Objective)	4723303 / 4723302				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	1880	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED REPORT: Vision Statement pt 1, Vision Statement pt2 There are no statutorily designated heritage assets within the site or in proximity of the site.				
Attached files (Please see Objective)	4723303 / 4723302				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	1881	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT: Vision Statement pt 1, Vision Statement pt2</p> <p>Development of the site could provide a range of community benefits for existing and future residents in Harnham, namely: -</p> <ul style="list-style-type: none"> o Provision of new area of public open space, enhancing existing provision; o Improvement to public transport serving the area; o Increased employment opportunities within walking and cycling distance; and o Provision of a range of local convenience services and facilities within any proposed local centre. <p>Development will take place in accordance with a masterplan for the site approved by the Council.</p> <p>Bovis will prepare a masterplan for the site. However, it is unclear from this criterion how it will be approved by the Council. Further information is required on how this process will operate.</p> <p>Other policies within the Site Allocations DPD indicate that the masterplan should be approved as part of the application process and Bovis consider that this should equally apply to their masterplan.</p> <p>Finally, we note the viability assessment undertaken by BNP Paribas. This assessment has been undertaken without any consultation or input from Bovis Homes. Accordingly at this stage Bovis would object to the viability assessment.</p> <p>Finally, we note the viability assessment undertaken by BNP Paribas. This assessment has been undertaken without any consultation or input from Bovis Homes. Accordingly at this stage Bovis would object to the viability assessment.</p>				
Attached files (Please see Objective)	4723303 / 4723302				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	1882	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road Salisbury		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SEE ATTACHED REPORT: Vision Statement pt 1, Vision Statement pt2 At least 1.8ha for a two form entry primary school along with playing pitches. There are no objections in principle to the development meeting its need for primary education. However, the requirement for a 1.8ha two form entry primary school is beyond that which is justified for the proposed development. Accordingly Bovis object to this requirement. Provision of sufficient school and healthcare capacity to meet the need created by the development. Reference has already been made to the proposed education provision. Bovis believe that the provision of a 1.8ha two form entry primary school as not proportionate to the need created by the proposed development. With regards healthcare provision once again there is no objection in principle to the provision of healthcare provision however at present there is no evidence available in terms of the need for additional healthcare facilities etc. Bovis believe that additional evidence is required.			
Attached files (Please see Objective)		4723303 / 4723302			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The issues raised need to be the subject of discussion and debate.			

Comment ID:	1883	Consultee Mrs Amanda Cleverly Person ID: 1131172	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Please find attached my representation form in response to the above consultation for land east of Farrells Field, Yatton Keynell. The details in this letter should be considered as part of my representation.</p> <p>In response to question 6 on the form, I set out my reasons for the plan being unsound as follows:</p> <p>1. There is No evidence of housing need for Yatton Keynell</p> <p>The site is outside the framework of settlements boundary and is open country-side. It provides an attractive green buffer zone separating Yatton Keynell from the adjacent but separate small communities at Cold Harbour and Tiddlywink to the south-east.</p> <p>The proposal for 30 houses on land east of Farrells Field has been put forward at County level in order to meet the County's strategic housing requirements for the Chippenham remainder area. The site allocation for 30 houses in Yatton Keynell is not based on any evidence that there is a specific local housing need in Yatton Keynell. Appendix E of the Chippenham Community Area topic paper, confirms that no local housing needs survey was undertaken as part of the draft Plan. The proposed dwellings should be justified with evidence that there is a specific local need and the plan should confirm how that need will be met.</p> <p>In light of the above the plan is unsound, it not justified and is not consistent with national policy set out in paragraph 158 of the NPPF which states:</p> <p>'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'.</p> <p>2. There is an Absence of a Neighbourhood Plan</p> <p>Of the five large villages within the Chippenham Community Area, Yatton Keynell is the only village without a Neighbourhood Plan. It is acknowledged that delivery of housing supply through a community led Neighbourhood Plan offers a positive and proactive approach to delivering housing need rather than a site selection process which is only put forward by landowners.</p> <p>The local Ward Councillor (Cllr Scott) called for a Neighbourhood Plan to be made at a Parish Council meeting back in November 2014 (copy of minutes attached and minutes quoted below). This was suggested in response to specific concerns that were raised by the community in relation to the proposal for development of land adjacent to Farrells Field. The Parish Council have not addressed this request.</p> <p>Notes from the minutes to November 2014 (extract)</p> <p>'Cllr. Scott advised that Yatton Keynell should look into setting up a neighbourhood plan, which allows people in the village more of a say as to what they want in terms of any developments that may be proposed'. (extract)</p> <p>'The proposed land is just outside the village boundary for Yatton Keynell, and unless the village see it a necessity the council favours objecting to the development'. (extract)</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states:</p>				

'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be engaged in a proactive way, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made. There have been applications for development by local residents in Yatton Keynell (as infill) including a recent one in Tiddlywink which would work towards addressing the local community need.

The site selection process is unsound

Para 5.13 of the Chippenham Community Area Remainder Topic Paper – June 2017 states that the village of Sutton Benger which has an identified a housing need, was discounted as a village which could accommodate additional housing growth. The Plan states that the village primary school cannot accommodate growth and therefore the village cannot accommodate more housing. The exclusion of the village from the housing allocation plan seems unjustified as the plan should consider all housing types not just those for families. Just because the school is full that doesn't exclude new housing being delivered for elderly, and people without children (flats starter homes). If some additional housing was accepted in Sutton Benger it might reduce the overall need for housing which has been identified in the other larger villages where there is considered no housing need.

The village of Yatton Keynell which has no evidence of identified housing need (this is minuted in Parish Council Meeting minutes November 2014, attached), and no Neighbourhood plan has been identified for having a significant proportion of the 138 dwellings needed to meet the Chippenham Area Strategic housing target.

The housing sites selection process is contrary to Para 159 of the NPPF. It states:

'Local planning authorities should have a clear understanding of housing needs in their area. They should:

prepare a strategic Housing Market Assessment to assess their full housing needs andThe Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which

addresses the need for all types of housing, including affordable housing and the needs of different groups in the community such as but not limited to families with children, older people people with disabilities, service families and people wishing to build their own homes...';

Another factor which was not considered as part of the site selection was the landscape constraints in place for the village Yatton Keynell. A significant amount of Yatton Keynell settlement and adjoining land is washed over by AONB rendering a large area of land that is not available for development. This fact should have been identified as a constraint in the overall site selection process and taken into account when considering the amount of new development proposed in the village.

4. There are Infrastructure issues

Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area.

These issues are identified in the site allocation supporting text, and the need for a capacity appraisal and further assessment is required.

Infrastructure needs should be identified and established prior to the allocation of the site..

5. 30 dwelling will have a significant impact on the character of the area

Para 5.31 identifies land East of Farrells Field, Yatton Keynell for the development of approximately 30 dwellings which currently resides outside of the boundary.

The Council claim that 'it is in a location that has the capacity to accommodate change from an environmental, heritage and landscape perspective, and could assimilate into the existing built form, whilst positively conserving and enhancing the village-edge setting'. However, a large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area.

6. Lack of community engagement and poor consultation

The draft plan process is lengthy, complicated and difficult for us as the public to work with. Even the forms are hard to find, understand and they are hidden from view. It certainly does not encourage engagement or 'plain English understanding'.

The planning process which has taken place and resulted in the Farrells Field site being put forward for housing, has not been meaningful, as it has not provided opportunity for the local community to comment on or consider alternative sites. The Parish Council have not engaged in the plan process or adequately represented the views of the local people in response to the proposal being put forward. (as noted in point 2.)

	<p>I consider the proposed allocation for such a large site which will have such a significant impact on the community in yatton Keynell should be the subject of a more meaningful consultation process by means of a Neighbourhood Plan.</p> <p>It is my understanding (from P61 of the Chippenham Community Area Remainder Topic Paper) that of the five large villages identified as part of the Chippenham remaining area, none of the Parish Council's responded to the Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement. It states in para 2.23:</p> <p>'Town and parish councils are the most local tier of democratic representation and, as such, they provide a key link with local communities. They are a specific consultation body under the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires that Wiltshire Council has to consult with specific consultation bodies which they consider may have an interest in the subject. Wiltshire Council is committed to continuing to consult with the local councils'.</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states:</p> <p>'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>7. The proposed site is out of the village boundary</p> <p>Land east of Farrells Field is currently outside of the village boundary. Granting permission for housing allocation means an extension to the village perimeter in turn linking up the separate communities that surround it (Tiddlywink and Cold Harbour</p> <p>Withdraw land at east of Farrells Field and allow a neighbourhood plan to be prepared giving residents opportunity to explore other site options in a proactive way. In line with NPPF para 155.</p>
<p>Attached files (Please see Objective)</p>	<p>4723530</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>I'm prepared to discuss/ enter a dialogue if necessary, to discuss the points I have raised about the 'unsound' nature of the Wiltshire Housing Site Allocations Plan.</p>

Comment ID:	1884	Consultee Mr Andrew Poole	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447415	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.16			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Draft Housing Allocation Plan for Netherhampton and Harnham.</p> <p>I attended two local meetings reference the above as I have a vested interest in property at Harnham and the road system. The Netherhampton meeting was well attended and the Harnham meeting in St Georges Hall had at least 250 attendees with some standing in the kitchen, even the windows were opened and people were leaning in to hear what was being said. There was a strength of feeling against the proposal.</p> <p>The proposal appears to be contrary to housing strategy policy, is it a brownfield site? A previous proposal mentioned 1200 houses, this would swamp the tiny village of Netherhampton which has already agreed to 30 houses. Does not appear to be in keeping with para 4.16 of the draft allocation plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1885	Consultee Mr Andrew Poole	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447415		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Harnham sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is insufficient transport infrastructure. A previous study in 2012 revealed that Harnham, the village adjacent to the proposal, suffers from traffic density. The Harnham gyratory system, Park Wall traffic lights were found to be operating close to and exceeding capacity. We are now five years on with much increased traffic mainly due to recent new builds.</p> <p>There is no Wiltshire plan for additional road systems to relieve traffic which has grown considerably and in fact the A36 Wilton roundabout must also be above capacity hence the frequent traffic queues.</p> <p>Harnham itself is blighted by continuous traffic queues even after commuter times bringing frustration and pollution to residents. It needs to be noted that apart from Bishops Wordsworth all the secondary schools are north of the City of Salisbury and the existing road system would suffer with much increased traffic.</p> <p>It would be much better to place new housing on the north side of Devizes road where some construction is already under way on the south side at Fugglestone.</p> <p>The village of Alderbury on the A36 had a similar traffic problem some forty years ago and the parish council agreed with Highways and the Council that if a bypass was provided further housing in the village would be acceptable. This was the way the problem was solved. At present there does not appear to be an identified route around Salisbury for additional road systems and any possible or likely routes, instead of being preserved, are being allowed to be built out. Is this the way to run a Country?. Salisbury is a hub of many roads, A360, A354, A345 A30, A338 and the trunk road the A36. Much of this traffic does not want to stop in Salisbury and has to use the woefully inadequate inner ring road which in itself creates a swathe of pollution on either side of the road. I think the time now is to step back and rethink the transport strategy before embarking on new housing projects. The Wiltshire Core Strategy insists that housing estate road will be built before house construction commences, surely this rule must be extended to large developments providing main road infrastructure.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1886	Consultee Mr Andrew Poole	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447415	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It needs to be noted that apart from Bishops Wordsworth all the secondary schools are north of the City of Salisbury and the existing road system would suffer with much increased traffic. It would be much better to place new housing on the north side of Devizes road where some construction is already under way on the south side at Fugglestone.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1887	Consultee Mr Andrew Poole	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447415	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There were issues of flooding mentioned and sewage disposal, I think one would agree that an estate of this nature on low lying land would vastly increase the run-off of water onto surrounding land rendering the land unusable for agriculture.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1888	Consultee Mr Andrew Poole	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447415	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Harnham itself is blighted by continuous traffic queues even after commuter times bringing frustration and pollution to residents. Salisbury is a hub of many roads, A360, A354, A345 A30, A338 and the trunk road the A36. Much of this traffic does not want to stop in Salisbury and has to use the woefully inadequate inner ring road which in itself creates a swathe of pollution on either side of the road. I think the time now is to step back and rethink the transport strategy before embarking on new housing projects. The Wiltshire Core Strategy insists that housing estate road will be built before house construction commences, surely this rule must be extended to large developments providing main road infrastructure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1889	Consultee Jarrett	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127005		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		SITE NOS. : H3.1 & H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The watermeadows between the hilltops & river are subject to flooding, which has increased in recent years to the point that standing water has been on the land for many weeks thus protecting the housing downstream nearby. Any reduction in the size of the watermeadows between Harnham Netherhampton, Quidhampton & Lower Bemerton will reduce the available space for wildlife to such an extent that the populations there are will not be able to maintain themselves & mix because of lack of useable 'corridors'.</p> <p>This land is a greenfield site & must NOT be built upon, EVER.</p> <p>This looks to me as if the council are rubbing their hands with glee at the idea of all the council tax they'll be able to milk people for.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	This is OUR countryside, if we aren't visible we can too easily be ignored.				

Comment ID:	1890	Consultee Jarrett	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127005		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		SITE NOS. : H3.1 & H3.3		Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>Currently the roads from Netherhamton corner to Harnham roundabouts do NOT cope with the traffic. If there is even the huge problem of a lorry having to turn around & hold up traffic for only a few minutes the build up becomes extreme drivers try to turn around etc etc. making accidents more like to happen.</p> <p>This land is a greenfield site & must NOT be built upon, EVER.</p> <p>This looks to me as if the council are rubbing their hands with glee at the idea of all the council tax they'll be able to milk people for.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	This is OUR countryside, if we aren't visible we can too easily be ignored.				

Comment ID:	1891	Consultee Mr Stephen Monk	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131188	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to voice my opinion which is strongly against further disproportionate developments around Salisbury. I find it incredible that further development is being considered on such an inappropriate scale around Salisbury, namely the proposed 840 homes in Harnham and Ntherampton.</p> <p>The traffic situation in Salisbury has been unable to cope with the demands placed on it for many years, as anyone who attempts to enter or leave the city will testify. This must be having a significant negative economic effect on businesses which rely on goods or materials being transported in or out of our city a timely manner. It must also act to cast a negative impression for employers considering siting themselves in our city.</p> <p>A second major employer and provider of revenue, tourism, must also be being damaged by the ill considered development of inappropriate housing estates around Salisbury. I have been fortunate to have worked and traveled in many areas of the world and seen many great cities. I am well aware that development is necessary but it saddens me that our city is being strangled by poorly scaled "blocks" of development that is turning the approaches to our unique city into a series of unappealing suburbs. Tourists come here to see a unique medieval city, not a series of housing estates surrounding a dying city center.</p> <p>I would ask those proposing the development to consider the legacy that such an additional development would be for our city, I would ask them to enter our city by any main roads and look at what is around them with the eyes of a tourist that has spent hard earned money to visit a city famous throughout the world for the beauty of its medieval streets, cathedral and surrounding countryside. I would ask them to look hard and think about how their development will affect the future of our city.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1892	Consultee Kent's Oak Ltd Kents Oak Ltd	Agent Mrs Caroline Jezeph Planning Consultant	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131190	Bryan Jezeph Consultancy Person ID: 1131187	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		6.8			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1 This representation addresses a site within the village of Middle Winterslow. The representation is concerned with the alignment of the proposed modification of the Settlement Boundary (as detailed on the Plan accompanying this representation).</p> <p>1.2 The representation endorses the review of the boundary and notes the methodology which was employed as set out in Topic Paper 1 Settlement Boundary Review Methodology June 2107.</p> <p>1.3 This representation supports the realignment of the boundary in the vicinity of Witt Road but objects to the exclusion of an adjoining parcel of land. The realignment is not sufficiently extensive and thereby excludes land which should be considered as part of the Gunville area of the settlement of West Winterslow. The omission of the additional land renders the Plan not justified in this particular regard.</p> <p>2.0 Site Description</p> <p>2.1 The site lies within Middle Winterslow on the south side of the settlement. Witt Road runs southeastwards from the junction of The Common and Gunville Road. It is a lane of approximately 600m. The land is also a cul de sac terminating in two tracks serving more isolated dwellings. Much of the road is a shared surface road although there are some lengths of footpath approximately half way along.</p> <p>2.2 The road is characterised by continuous residential development along the northeastern side of the road. On the southwestern side of the road the frontage development is more sporadic. There is an enclave of a development of 6 dwellings (two terraces of three properties) at Bentley Way. Further along the road lie the properties Applewood Cottage, Dale Cottage, Fernlea, Suncot and Juniper. All except Juniper are sited right of the edge of the carriage way resulting in a strong and very evident building line.</p> <p>2.3 The properties have been developed over many years and show much diversity in age, size, style and appearance. The plot sizes also vary considerably with some properties and their curtilages running parallel to the road. The building line varies along the road with the older properties built close to the road.</p> <p>2.4 It is noted that the entire northeastern frontage of Witt Road was included in the settlement boundary of the previous Local Plan. This explains why there are recent infill plots along the road frontage.</p> <p>2.5 The site, the subject of this representation, is sited at the very northern end of the road on the southwestern side of the road. The site adjoins 1 Witt Road and is partly developed currently accommodating some worksheds. The property No 1 Witt Road has recently been sold and extended. The curtilage of the existing worksheds extends south eastwards to an existing barn which fronts Witt Road.</p> <p>2.6 On the northeast corner of Witt Road at its junction with Gunville Road stands the small Church of St John the Baptist. Just to the south and close to the dwelling No 1 Witt Road there is the Church Hall. Southwards lies the residential development fronting Witt Road.</p> <p>3.0 The Settlement Boundary Review Methodology</p> <p>3.1 In examining the Wiltshire Core Strategy the appointed Planning Inspector concluded that the settlement boundaries defined in the former District Local Plans were out of date. He advised that they should be reviewed without delay in order to ensure that they represent the most up-to-date position in policy terms. The Council therefore committed to reviewing the settlement boundaries through the preparation of the Housing Site Allocations Plan.</p>				

3.2 The review of the boundaries has been undertaken in accordance with the provisions of the Settlement Boundary Review Methodology. This document sets out the procedures by which the Council has come to devise a methodology which provides a consistent approach to defining settlement boundaries throughout the County. This methodology has sought to meld together the various approaches from the former Local Plans which previously covered the districts of Wiltshire. The Methodology has also had to regard to the approaches of neighbouring Local Planning authorities which have carried out similar reassessment of their settlement boundaries. During the preparation of the methodology appropriate formal and informal consultations were held with relevant stakeholders.

3.3 It is noted that the Council is seeking not to include land which relates to the countryside but that it does include land that it 'physically related to the settlement'. It is considered that the interpretation of this latter phrase should not be too restrictive.

4.0 The Case for a Further Amendment in the Proposed Boundary

4.1 The Salisbury District Local Plan 2011 defined the 'Housing Policy Boundary' which was the term used for what is now the 'Settlement Boundary'. That boundary was tightly drawn around existing buildings in the village and it included the property No 1 Witt Road but none of the adjacent land.

4.2 The boundary also enclosed the existing frontage development on both sides of Witt Road and in some cases to some depth behind the frontage. It is noted that the proposed revised boundary maintains the previous alignment and adds one full curtilage at the far end of Witt Road.

4.2 In respect of No 1 Witt Road the proposed boundary now includes the workshops and some of the adjacent land and this is supported.

4.3 However this representation seeks the inclusion of a modest area of additional land. This proposed inclusion relates well to the existing settlement. The proposed increase in area of the Settlement Boundary in the vicinity of No 1 Witt Road is 0.226ha. There is an area of a further 0.132ha which adjoins the proposed boundary on the road frontage which should also be included within the revised boundary.

4.4 This land in question is a smaller area than that already proposed and its inclusion would round off the settlement boundary in this corner of Winterslow. The site relates very well to the settlement of Winterslow in that it is close to the centre of the settlement. It is noted that the site is just less than 100m from bus stops on Gunville Road. The bus services serving Gunville Winterslow are services 87 and 88. Service 87 runs between Andover and Salisbury and Service 88 runs between Winterslow and Andover. There is also a bus service which runs on school days only.

4.5 The site slopes gently downhill away from Witt Road. To the southwest there is a large agricultural building. This forms part of the surrounding farmland and would be excluded from the proposed amended boundary.

4.6 It is considered that this extended site would make an effective but modest contribution to the settlement if frontage development was facilitated. The application of the Settlement Review Policy should not be too restrictively imposed such that it misses the opportunity to make an efficient and effective use of land.

5.0 Conclusion

5.1 The revision of the Settlement Boundary in Winterslow is welcomed and supported in respect of the proposed change made thus far. However, the opportunity to include small areas of additional land which are close to the village centre and in a sustainable location should not be overlooked. In this context this representation makes the case that the additional part of this frontage which amounts to 0.132ha should be included within the revised Settlement Boundary as shown on the Representation.

5.2 This representation seeks the inclusion of the land shown hatched red on the accompanying plan within the Settlement Boundary. It is a sustainable site which relates closely to the existing built up area of Winterslow.

Attached files (Please see Objective)

4723683

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1893	Consultee Mrs Lindsey Wood Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		West Knoyle Parish Council Person ID: 392667		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I can confirm that the above consultation document was considered at a recent meeting by West Knoyle Parish Council. The Parish Council has asked me to point out that due to the settlement strategy set out in Core Policy 1 and the fact that the village has no Housing Settlement Boundary as it is regarded as non-sustainable, the village is at risk of becoming a dormitory village full of elderly people with no younger people around to look out for them. Rural businesses in the area struggle to find employees and local amenities are suffering due to lack of younger attendees/volunteers. Whilst members accept the fact that it would be wholly inappropriate to encourage any large-scale development within the village, the current limitations would appear to prohibit any form of development for local workers and younger families other than via an Exception Policy. The Parish Council would like to see some relaxation in the policies in order to allow some minor low-key development for local employees and young people.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1894	Consultee Mr Roger Williams Person ID: 1127014	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>B2 The Southwick Court site 3565 proposal should not go ahead because it is a direct result of the County Council's failure to manage the performance of the building of the correct amount of houses at the development at West Ashton, a situation which they should make an imperative to rectify with those developers and achieve full target on time building rates in accordance with the original plan for West Ashton. It was confirmed at the recent Wiltshire County Council Cabinet meeting (20th June 2017) in front of dozens of residents, parish and town councillors who attended, that proposals such as Southwick Court 3565, and many of the others planned for areas outside the settlement boundary of Trowbridge, are being considered as a direct result of the developers of houses at West Ashton reneging on their commitment to build the correct number of houses within agreed timescales. Indeed, some Councillors quoted figures of over 1000 shortfall for this project, which clearly creates an unfair and unsustainable situation in Trowbridge.</p> <p>It is apparent, therefore, that if the West Ashton site were on target the additional housing developments such as 3565 would not be required or countenanced, and we assert that the County Council needs to take responsibility of rectifying this situation as an imperative, by pressing the West Ashton developer into improving its performance in order to negate the need for the developments we are objecting to.</p> <p>We believe that the failure of the County Council in managing the performance of, and relationship with, this developer shows how the Council is being inadequate in its management of developers and may be failing in its duty of care. Developers, despite the weak assurances by the Cabinet members that this is not the case, may even be manipulating the Council's strategy and approach, evidenced by the provision of planning permission to several sites in Wiltshire that have not yet been developed – some stated by Cabinet as having over 10 years delay. Furthermore, we assert it is WCC's duty of care to taxpayers that they immediately identify what actions can be taken (including legal actions) to achieve the correct level of building with the West Ashton developer, whilst simultaneously and urgently establishing a way forward with other developers with delayed developments to speed up the potential building of these property developments as part of the Trowbridge allocation.</p> <p>In summary, we propose that</p> <ul style="list-style-type: none"> There is a fairer allocation of development sites, relieving Trowbridge of some 400 of the proposed dwellings allocation That you bring into the calculation the 820 additional dwellings proposed by TCC That the West Ashton developer and other latent developments are placed under increased pressure by the County Council as an imperative to speed up the building and to maintain original commitments That 3565 Southwick Court is removed from the plan. 			
Attached files (Please see Objective)				
If your representation is seeking a change, do you consider it necessary to				

participate at the oral part of the examination?	
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Comment ID:	1895	Consultee Mr Roger Williams Person ID: 1127014	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>B3 The proposed development at Southwick Court 3565 unnecessarily prioritises building on a much-loved Green Field site (which are currently without planning permission), instead of prioritising Brown Field and other sites with existing planning permission yet to be completed. It was clearly stated in the Cabinet meeting on 20th June 2017 that there was a move to ignore sites in the Town with existing planning permission because the Council “could not control” when building on those sites might happen. The excuse given by the member for planning was it was about ensuring the right %’s of different types of land development as per regulations laid down by the Government, but it was not established as fact that these %’s had been applied, nor supported by evidence that Brown Field sites had to be actively ignored in preference to Green Field sites (which would not be logical given the large areas of Brown Field requiring regeneration in the centre of the town). Our understanding is that current Government communications do not require that Green Field sites should be prioritised over Brown Field sites and we propose the Council revisits the allocation and building plan accordingly.</p> <p>Our perception is that, against the wishes of the thousands of people in Trowbridge who value Green Field sites such as Southwick Court 3565, the County Council appears to be unnecessarily receptive to speculative developer pressure to develop those Green Field sites first rather than concentrating their efforts on redeveloping Brown Field sites in the Town (which are in desperate need of regeneration) and other sites in the town with existing planning permission.</p> <p>It is, we believe, fair to say that Trowbridge town centre area is not yet at an acceptable standard for any town, let alone a County Town and harbours many areas requiring urgent regeneration which have been derelict for many years. Where regeneration has been achieved, reasonable results have been evidenced such as with the Sainsbury’s site and the remaining old brewery sites adjacent and with Peter Black’s. These redevelopments have brought employment and housing in harmony, importantly in the middle of the town where it is needed most, not on the outskirts. This policy should be congratulated and prioritised for the remaining areas as it provides a recipe for success that out of town developments will never deliver.</p> <p>The Town Centre Brown Field sites provide excellent areas for starter homes and social housing as it has easy walking links to doctors, schools and shops for low income families who may not be able to afford cars or additional transport costs of living on the edge of the town. Conversely, in our view, any developer proposal for potential purchase and development of local farmland that does not have planning permission for residential development should be dismissed, especially where that land is outside of an external settlement boundary area and where the County, Town and local Parish councils have specifically stated they did not wish to change or develop, such as the Southwick area of which 3565 Southwick Court is part of.</p> <p>It was stated at the Cabinet meeting that this also reflects the policies of County Council, Town Council and Parish Councils but it appears that it is being ignored by the County Council’s own planners. We would like to know why and ask that the correct policy is adhered to.</p> <p>Such areas as 3565 Southwick Court being developed bring no social benefit to the town, and simply increase car traffic to the town centre, the routes to which are already congested and polluted by noise and vehicle emissions.</p>			

	<p>We move that the “responsible people” running the County Council who maintain that they are trying to represent the wishes of the voters of their County, should not countenance speculative “get rich quick” developer pressures at the behest of the local residents. Instead, we believe the CC should support the inclusion of specifically identified sites into the allocation for Trowbridge, all of which are located within the Trowbridge Settlement Boundary as follows:</p> <p>Former District Council Offices, Bradley Road (70) East Wing/Trowbridge Hospital/Margaret Stancomb School (300) Bowyers (250) Ashton Street Centre (70) The Pavillions, White Horse Business Park (130)</p> <p>These amounts add up to an additional 820 additional dwellings, which would negate the need for the development of Southwick Court 3565 and other green field sites, removing the need for local villages to become engulfed into the Trowbridge suburban sprawl. The loss of village separation areas / buffer zones through development is also a strategy that seems to be against policy, but is simply being ignored.</p> <p>In particular, the Bowyers site should be elevated to a primary category development site for the town of Trowbridge. To borrow a phrase from the heir to the throne “It is like a carbuncle on the face of a much loved aunt”. It has been an ever worsening sight in the heart of the town for over 10 years and sets a very poor impression especially when visitors arrive by train from the more salubrious areas of Bath and Bradford Upon Avon. Yet it has the potential to bring significant economic and social benefits directly to the centre of the town and the high street where shops and businesses are crying out for customers.</p> <p>Additionally, as raised by me at the Cabinet meeting, the current development plan was produced by WCC in 2015 at a time when Bowyers was being considered for an alternative commercial development, which is no longer the case. Therefore, the Council should be sensible enough to recognise this difference and the site should now be included in the housing development plans for the town as the number 1 priority, and the other planned allocations for Trowbridge amended down in number accordingly. This is also supported by the Trowbridge Town Council’s amended proposals (see Appendix 1)</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1896	Consultee Mr Roger Williams Person ID: 1127014	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>B4 In relation to house building development proposals, the Council is being “developer led” and not taking proper control of planning and new proposal developments, or cognisance of its own planning policy.</p> <p>The Council’s leader assured residents at the Cabinet meeting on 20th June 2017 that they were following their own planning policy and were supportive and would listen to the evidence against the 3565 proposal and other schemes and assured residents and councillors alike that they were not “developer led”. This was repeated by the member for planning.</p> <p>However, as per our point B2 (above) the evidence suggests otherwise, as was obvious to all who attended the meeting. The inadequate answers by cabinet members, demonstrated that the strategy is driven by the developers because the Council “could not control them” (for example in relation to the case of the West Ashton building programme delays). It was further admitted “There is no point in asking developers for extra money under section 108 as they will just walk away”(see webcam footage on WCC website).</p> <p>Unfortunately, this admission shows the weakness of the strategy and approach taken by Council in relation to developers and should be the subject of an urgent enquiry to ensure tax payers are getting value for money from developers in terms of Wiltshire’s housing development.</p> <p>It was also stated that consideration of the 3565 and other Green Field proposals are as a direct result of the West Ashton developer not building the correct number of houses, nor being fast enough to complete the planned building programme on time, putting the pressure on the Council to find alternatives to keep up with the Government’s requirements.</p> <p>It is, therefore, a reasonable assumption that the County Council’s planning representatives may have been unduly influenced by the recent approaches of speculative developers, who propose that Council choose to prioritise their (the developers’) Green Field sites over others. Failure to effectively manage suppliers (as in the West Ashton situation) would not be tolerated at a high level in a private organisation so why should they be tolerated in a responsible County Council organisation? All this presumably adds costs and is wasting tax-payers money at a time when money is short for front line services and Council Tax is being increased.</p> <p>Additionally, several town councillors articulated how the agreed planning policies of the County Council and Trowbridge Town Council were not being followed, in particular in relation to prioritising Brown Field site development before Green Field development outside settlement boundaries. We are not experts in the policies but seek assurance that the points raised by the councillors are not being ignored and remedial action is being taken to change the approach of Council’s planning department where they are at fault.</p> <p>Several examples were provided about how decisions taken by, and the opinions of, the local Parish Councils and Trowbridge Town Council had been completely ignored in these proposals. Again this is a worrying trend, suggesting Council is acting arbitrarily and not listening to the valuable feedback from grass roots.</p> <p>That the County Council Planning Strategy is in direct conflict with the wishes of Trowbridge Council and the local Parish Councils, as was evident at the Cabinet meeting, suggests to me as a member of the public that the planning activity at the Council may not be performing to the standards to be reasonably expected. Clearly steps must be taken to ensure that there is a more effective and timely management of developers and the processes used to provide the best results for local council tax payers.</p>			

	For example, it was stated at the same meeting that the 2500 page Planning Document about Housing Development doesn't even mention Bowyers. This points to possible negligence, or at least ineptitude, on the part of the County Council and / or their advisors – a point we hope that the Planning Inspectorate will take cognisance of when the time comes.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1897	Consultee Mr Roger Williams Person ID: 1127014	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>B5 Initial consultation on the boundary changes was inadequate – does this breach planning law or regulations and does it indicate inadequate process by the County Council?</p> <p>Having lived in Trowbridge for 14 years, I was shocked to only find out about settlement boundary change proposals within a few yards of my house 1 day before the Cabinet meeting in June, despite the assertions by the County Council representatives that a “full and substantive consultation” had been carried out over a long period of time.</p> <p>Whilst I understand that ignorance is not a defence in law, we consider ourselves well read and active in and amongst local community life. For us and many of the other members of the public who attended the Cabinet meeting it seems, learning about this at a point that was quite late in the consultation process did not provide a reasonable amount of time for a response before the vote by the Cabinet to pass their resolution to progress to the formal development proposal consultation. Indeed we only attended the Cabinet meeting because of a worried neighbour that knocked on our door that day before.</p> <p>At the Cabinet meeting (see the webcam evidence) I gave an example of a road safety project I am involved in in Bath as a School Governor about the way a zebra crossing proposal (a minor development in comparison to this one) was the subject of letters to affected households in the area that might be affected. This was for a minor project.</p> <p>Despite the proposal to turn our road, which is quiet cul-de-sac for 44 years with only 22 houses in it, into a major thoroughfare with up to 720 cars daily using it, there was no written advice issued to our address. This is not evidence of a Council that cares about its residents. Consequently we were totally unaware of the consultations and propose that the Council urgently reviews its methodology of promotion of consultation matters.</p> <p>It was admitted at the Cabinet meeting by the Council that there had been “difficulties” in advertising the consultation and it had even been needed to hold the consultation again because so few people attended the first time. Why was there not wider coverage with advertisements in the press, on local radio, leaflets / letters through the doors of affected properties, etc.?</p> <p>This failure to advertise effectively and engage with the local residents leads us to believe that the Council may have failed in its duty to consult fully with local residents about a significant settlement boundary changes in our area and developments affecting our properties, roads, health, safety, stress and mental wellbeing, as well as our local way of life.</p> <p>Therefore, we propose that additional consultation time is provided for residents and simpler, less complicated documentation is provided at the next stage of consultation when amendments to the proposed plans are considered – both well before the County Council votes on such amendments.</p> <p>We also call for detailed responses to the individual consultation responses that the County Council receives and full publication of these responses, available online and in print at County Hall and other communication points such as libraries and Town Halls with timely and widely publicity.</p>			

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	1898	Consultee Mr Roger Williams Person ID: 1127014	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>B6 Increased traffic on local roads near Southwick Court site 3565</p> <p>Traffic ingress and egress into any new development at Southwick Court 3565 will create a significant rise in traffic on local roads, which are already heavily used, as well as increasing pollution on these busy roads.</p> <p>The evidence shows that a development of 180 houses at Southwick Court alone, reflecting current car ownership in this area, would bring at least a quarter of a million additional extra car journeys on already cramped and crowded roads (estimate at average of 720 trips a day = 263,000 per year).</p> <p>Any access via Silver Street Lane to site 3565 via the cul-de-sacs leading off Silver Street Lane would create traffic congestion on minor roads that are already under pressure at peak times, e.g. College Road and Willow Grove (the link between Silver Street Lane and College Road), the exits from Silver Street Lane onto Frome Road and onto Bradley Road, congestion at school times by the entrance to Hazel Grove and Clarendon, etc.</p> <p>Silver Street Lane is already subject to considerable concern about speeding, being used as a rat run in the peak and a race track in the evening. Extra traffic will simply increase the risk, endangering pedestrians and local resident car users alike.</p> <p>In rush hours there is significant queuing on the sections of Bradley Road between the Spitfire Retail Park and the Town Centre. This traffic predominately comes from the direction of Silver Street Lane, North Bradley village, Westbury, White Horse Business Park and West Wilts Trading Estate in the morning into the town.</p> <p>In the evening peak and at weekends there are delays in both directions. Additional traffic feed from Silver Street Lane (which would become an even worse rat run than now) would be untenable. The same applies in the opposite direction out of Silver Street Lane onto Frome Road.</p> <p>Traffic has already increased significantly at weekends due to the success of the Spitfire Retail Park and the one way system requiring all cars to turn left and go through to the roundabout to return down Bradley Road towards Silver Street Lane.</p> <p>Throughout the day and particularly in the evening Silver Street Lane's narrow, dipping and twisting road becomes a race track with cars far exceeding the 30 mph speed limit which makes the risk of additional traffic from the proposed development a serious road safety concern.</p> <p>Silver Street Lane is also a key access point to Hazel Grove where the local primary school is situated. Children and parents would be at increased risk from additional traffic on this road near to the Hazel Grove entrance and the footpath leading into Silver Street Lane from the rear of the school. Parking at school hours is already an issue on Silver Street Lane following parking bans in Hazel Grove.</p> <p>One of the most alarming elements of the proposal is the idea to access any new development at Southwick Court via either (or both) Balmoral and Sandringham Roads, although we are only hearing this as a rumour because the Council's representatives at the Public Consultation refused to provide any information on road access to site 3565 Southwick Court.</p> <p>The turning into Sandringham Road is a sharp turn on an incline with limited vision from the direction of Frome Road because of a significant dip in the road.</p>			

	<p>Sandringham Road then narrows within a few yards of the junction and drivers are presented with a blind bend which is already dangerous. It is manageable with the current limited car flows from the 22 houses in Sandringham Road and the dozen or so which access Windsor Drive via Sandringham Road, but would not be suitable for additional traffic due to the restricted line of sight and the reduced width. Children on bikes also often use the bottom of the road as a play area.</p> <p>Egress from the junction of Sandringham Road onto Silver Street Lane is also not suitable for increased traffic due to the limited sight lines, traffic volume and speed along Silver Street Lane, plus the incline at the point of exit.</p> <p>Sandringham Road and Balmoral Road have been established as cul de sacs for over 40 years – please refer to the notes about these roads and settlement boundaries in Section A of this document which should be read in conjunction with Section B.</p> <p>Given the comments by the member for planning about not getting investment for additional infrastructure from developers, does that mean that the tax-payer would be burdened with additional costs of road access to the development and required changes to access into Frome Road and other necessary road changes? These and other questions about road access arrangements have not been answered as part of the consultation and we request urgent answers so we can comment.</p> <p>Indeed we are under the impression that the Council is somehow hiding this information, as it was not available at the public consultation, but other residents have told us that it exists. We would be glad to receive the information if it is available.</p> <p>If, as is suggested by the Council representatives, there are no designs to be considered for the road access into site 3565, how are we supposed to have a chance to provide comments in a full and open way? For the reasons already stated we request this information to be made available and additional time provided so that we can comment on it. Please also explain about the proposed exclusion from the settlement of the tarmac roadway area outside the last 5 houses at the end of Sandringham Road.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1899	Consultee Mr Roger Williams Person ID: 1127014	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As stated in Section A, Sandringham Road, has a history of special requirements in relation to water drainage, with specially designed deep level drainage to cope with the ingress of storm water and sewerage at this point of the estate.</p> <p>There is a winterbourne stream / culvert at the end of the road in the ditch that is the current boundary between the fields of Southwick Court and Sandringham Road. From the Environment Agency map (see Appendix 3) it can clearly be seen as a natural extension of the Lambrook Stream and we believe this should not be compromised or re-routed as it forms part of the natural flood protection for Sandringham Road.</p> <p>Several properties at the lower level of Sandringham Road have been flooded in the past, following rainwater pressure from storm surges. The last time this happened was in 2013 and we attach pictures to show the problem in our garden (see Appendix 2). In addition to the excess rainwater, we suffered an ingress of raw sewage from flooded sewers which was distributed across our property and neighbouring properties, requiring a major clean up by Wessex Water, which took many weeks and at significant cost.</p> <p>It is for this reason we are extremely concerned that WCC has refused us access to the information provided to them by the water authority in respect to the flood plain / drainage / water / sewerage for the potential development at Southwick Court site 3565. We repeat our request under the terms of Freedom of Information for us to be provided with the information and reports from Wessex Water and other agencies involved in advising the County Council and developers about this potential development. Please forward the information we have requested and provide more time for proper and specific consultation on these matters.</p>				
Attached files (Please see Objective)	4712569				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1900	Consultee Mr Roger Williams	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1127014		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Primary and Secondary School places, Doctor and Dental services and Police and Fire services are all currently inadequate in Trowbridge for the population.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1901	Consultee Mr Roger Williams	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1127014		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Walking distance to the only school we believe has places (Walwayne Court Primary School) from site 3565 is too distant for young children and so will lead to increased school run traffic (proposals seem to suggest it is in walking distance)			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1902	Consultee Mr Roger Williams	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1127014		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The proposed boundary changes will destroy the limited Green Field areas within walking distance of the southern part of the town, reducing the wellbeing of the population and increasing the need for use of cars to reach other recreational areas			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1903	Consultee Mr Roger Williams	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1127014		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Atkins report on Site 3565 proposals and other Green Field sites proposed, appears to refer to recreation in the woods located beyond Yarnbrook which are around 3 miles away requiring use of a car - ironic when the nearest green recreation for current residents in Sandringham and Balmoral Roads is only a few meters away in easy walking distance on the very fields that are proposed for development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1904	Consultee Lindsey Wood Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Mere Parish Council Person ID: 477226		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.68			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I can confirm that Mere Town Council has considered the above document and Proposals for the Revised Settlement Boundary of Mere. Mere Town Council is broadly supportive of the Settlement Boundary Review – Pre-submission which is broadly in line with the suggestions that the Town Council made back in September 2014. Members would like to make one or two amendments though: M8: Southbrook – garden at Orchard House Although members felt that it was consistent to have this garden within the Housing Settlement Boundary, they also felt it was inappropriate for the area to be within the Housing Settlement Boundary as it contains the site of Southbrook pond which is an important drainage/water holding pond for the Southbrook area in wet weather times. The Town Council would therefore like this garden area to be excluded from the Housing Settlement Boundary.				
Attached files (Please see Objective)	4723697				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1905	Consultee Lindsey Wood Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Mere Parish Council Person ID: 477226		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.68			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I can confirm that Mere Town Council has considered the above document and Proposals for the Revised Settlement Boundary of Mere. Mere Town Council is broadly supportive of the Settlement Boundary Review – Pre-submission which is broadly in line with the suggestions that the Town Council made back in September 2014. Members would like to make one or two amendments though: M10: Southbrook Road (east) In order to be consistent, there are three extended gardens on the eastern side of Southbrook Road which should be included within the Housing Settlement boundary				
Attached files (Please see Objective)	4723697				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1906	Consultee Lindsey Wood Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Mere Parish Council Person ID: 477226		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.68			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I can confirm that Mere Town Council has considered the above document and Proposals for the Revised Settlement Boundary of Mere. Mere Town Council is broadly supportive of the Settlement Boundary Review – Pre-submission which is broadly in line with the suggestions that the Town Council made back in September 2014. Members would like to make one or two amendments though: L10: Southbrook Road (west) In order to be consistent, there are extended gardens on the western side of Southbrook Road which should be included within the Housing Settlement boundary			
Attached files (Please see Objective)		4723697			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1907	Consultee Lindsey Wood Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Mere Parish Council Person ID: 477226		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Mere Community Area Topic Paper			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Para 2.4 (4th paragraph) all developments within the community area will need to conserve the designated landscape of the Cranborne Chase & West Wiltshire Downs AONB and its setting, and where possible enhance its locally distinctive characteristics. The whole parish of Mere is not within the Cranborne Chase and West Wiltshire Downs AONB (and neither is Zeals) and Mere Town Council feels that this paragraph has the potential to add unnecessary constraints and limitations to any potential development that may be required for Mere. However, we do appreciate that any development in Mere may affect the immediate setting of the AONB and would suggest that this paragraph could be re-worded: All developments within the Cranborne Chase & West Wiltshire Downs AONB will need to conserve the designated landscape of the Cranborne Chase & West Wiltshire Downs AONB and developments from parishes in the community area which are outside the Cranborne Chase and West Wiltshire Downs AONB will need to conserve its immediate setting, and where possible enhance its locally distinctive characteristics.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1908	Consultee Lindsey Wood Town Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Mere Parish Council Person ID: 477226		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Mere Community Area Topic Paper				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Para 2.9 Although it was probably unknown at the time that this discussion paper went to print, the Town Council has now agreed to embark upon a Neighbourhood Plan – the area of which will be based on the parish boundary.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1909	Consultee Mr George Bunting Chairman Hilperton Gap Action Group Person ID: 895670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>These representations are from the Hilperton Gap Action Group, a grassroots organisation representing the views of a large segment of the community in Hilperton village and eastern Trowbridge. Our particular interest is in SHLAA sites 263 and 297 (in the Hilperton Gap west of Elizabeth Way) but many of our objections that the Draft WHSAP is unsound apply more widely.</p> <p><i>[see map in attached full report]</i></p> <p>These comments are in addition to those we put forward at the informal consultation stage which we consider you have disregarded.</p> <p>We say that the Draft Wiltshire Housing Site Allocations Plan ('your Plan') is unsound for the following reasons;</p> <ol style="list-style-type: none"> 1. Your Plan is not justified because your method of calculating housing requirements for HMAs overestimates the requirements for new sites and contains errors. 2. Your method of disaggregating housing needs within HMAs is outdated and is not positively prepared. 3. Your treatment of 'windfall' completions is not justified and unrepresentative of reality on the ground. 4. You have failed to encourage use of brownfield sites, inconsistent with national policy. 5. You have made unrealistic assumptions, which are not effective, on developer contributions for necessary supporting infrastructure. 6. You have included a SHLAA site with unregistered land which is not effective. 7. You have not justified why completion of a long planned urban extension to Trowbridge has now been delayed beyond ten years. 8. Conflicts between your Plan and Wiltshire Core Strategy settlement policy and recently confirmed settlement boundaries are not justified. 9. You have ignored Planning Examination findings such that it is not positively prepared. 10. You have made unrealistic assumptions on building density which are not positively prepared. 11. You have not justified the allocation of site 297 for housing because you have failed to declare in your plan that you have a vested interest in allocating agricultural land that you own for development. <p>We have expanded on these objections in more detail below.</p> <ol style="list-style-type: none"> 1. Your Plan is not justified because your method of calculating housing requirements for HMAs overestimates the requirements for new sites and contains errors. <p>We refer to the WHSAP Pre-submission draft plan:</p>			

[see table in attached full report]

- Cell E3 contains an error and should read 895 (910 plan allocation less 15 already in commitments). Cells F3 and G3 therefore contain incorrect totals
- The total (col. G) Wiltshire surplus against requirement is 4,629 homes (inc. the 100 you have omitted at cell E3) or 11.3% of the requirement over the plan period. This translates into five year land supply estimates in excess of the requirements of national planning policy in N&W Wilts HMA in every year of the plan.

[see table in attached full report]

We say that it is clear that WC is using this exercise to engineer objectives beyond those required of a housing site allocations plan and in pursuit of an ambition, unrelated to local housing requirements, to create a large urban settlement.

In a June 2017 Planning Appeal the Planning Inspector found in any case that the 'Liverpool Methodology' whereby a housing shortfall in one year should be made up over the remainder of the plan period, is appropriate to apply in Wiltshire. This further supports our representation that housing sites have been over allocated.

An example is the allocation of land for a further 800 homes to Trowbridge (in addition to the 4,790 completed and committed and a further 1,000 'delayed') in spite of these being in excess of HMA housing needs. This would increase the size of Trowbridge by over a quarter in just 15 years from 2011 - 2026.

[see table in attached full report]

Plus a further 1,000 ('delayed' at Ashton Park) presumably within a further five years providing a further 6%. So in 20 years Trowbridge would expand by one third.

We say that this rate and scale of expansion is unwarranted, not properly thought through and therefore unsound.

Changes to the Plan that we propose:

- a) Correct the error in cell E3 of Table 4.7 WHSAP and associated calculations elsewhere in the Plan.
- b) Adjust plan allocations 2017-2016 in the N&W Wilts HMA to reflect more accurately the actual need for sites to provide a five year supply plus a buffer by removing SHLAA sites 263, 297 and other sites not required in the current plan period that would create unsustainable demand on infrastructure and services.

2. Your Plan is not positively prepared because your method of disaggregating housing needs within HMAs is outdated and dysfunctional

DCLG Planning Guidance says:

"Needs should be assessed in relation to the relevant functional area, ie housing market area, functional economic area in relation to economic uses, or area of trade draw in relation to main town centre uses."

However, you have disaggregated HMA housing needs firstly into 19 Community Areas (conceptual entities invented in 1998 and largely based on ancient settlement patterns). These CAs are then further split into towns and their rural hinterlands, a total of 37 parcels each averaging 6 miles square.

- **We say** that these sub-Community Areas are far too small and are an unsound basis to define where homes are needed. Even since 1998, working, shopping and recreational patterns have changed substantially and long gone are the days when most people looked to their immediate local town for these needs, let alone to a rural village hinterland. The single most important remaining determinants of where people would like to live are where they work and how they travel to it. The Travel To Work Area is the most robust and widely acknowledged descriptor of this pattern. This defines an area where 75% of people work and live in the same area. We show below the Trowbridge & Warminster TTWA superimposed on the HMAs and your Community Areas. We say that this clearly demonstrates that you should calculate housing need for larger units of geography than you have chosen.
- **We say** that micro-disaggregating housing needs assessment as you have done produces perverse and unsound results. For example
 - Trowbridge CA remainder is projected to provide 113 homes more than is needed in the plan period.
 - But Trowbridge (town) is deemed to be under supplied and you have allocated sites for 800 homes in the adjacent Trowbridge CA remainder.
 - Thus Trowbridge CA remainder is providing $800+113=913$ homes.
 - But your unsound and perverse analysis concludes that only 800 will be contributed against the requirement for Trowbridge.

[see map in attached full report]

Changes to the Plan that we propose:

- a) Disaggregate housing needs assessments in the Plan down to HMAs only. The market, controlled by the planning process, will ensure the most efficient distribution of housing to meet demand at the micro level.

3. Your Plan is not justified because your treatment of ‘windfall’ completions is inadequate and unrepresentative of reality on the ground

You have included an allowance for windfall sites based on the NPPF definition of “Sites which have not been specifically identified as available in the Local Plan process”. You have anticipated that 3,633 homes will be delivered in Wiltshire in this way during the plan period compared with 2,331 (inc. 100 missing in error) from WHSAP site allocations, i.e. in your 4,500 pages of formal stage WHSAP planning documents you identify where fewer than 40% of the required homes will be sited. Just one page of analysis purports to explain how over 60% of Wiltshire’s new homes will be provided.

- **We say** that that this cursory analysis of windfall is deficient and unsound, both relatively to the site allocations analysis and in absolute terms.

We object that your methodology:

- a) relies on ‘standard delivery rates’ derived from experience in 2001-2008, i.e. you are projecting delivery to 2026 from data that will be up to 25 years old!,
- b) uses a single set of delivery rate assumptions for the whole of Wiltshire and does not represent inevitable variation that will exist at least down to HMA level.

We say that your methodology for calculating windfall is based on obsolete assumptions, is too generalised and is therefore unsound.

Changes to the Plan that we propose:

a) Provide an analysis of windfall potential at a comparable level of rigour to your analysis of SHLAA sites.

7. Your Plan is not justified because you have failed to explain why completion of a long planned urban extension to Trowbridge has now been delayed beyond ten years

Housing has been proposed at Ashton Park for nearly twenty years and WC and its predecessor council have been planning large scale housing provision at Ashton Park for over ten years. This scheme has been worked up in great detail (and thousands of hours of officer time) as a strategic urban extension to Trowbridge, i.e. not just to provide housing but also addressing the associated needs for employment, roads and transport, education, healthcare and the environment in a holistic way.

The community has been involved in numerous consultations over the years about this, culminating in the adopted local plan which stated (Core Policy 59), "At Trowbridge, approximately 5,860 dwellings will be delivered and will involve an area for strategic growth to the south east of the town (Ashton Park), which extends towards the A350 to the south and the railway line to the west."

This strategic urban extension (with all its associated infrastructure) is thus the largest and most significant development project in Trowbridge for many years and we would expect to see (among your 4,500 pages of WHSAP reports) a detailed plan for how this housing provision will be delivered and an exposition of the impact it will have on the town. However, you make only superficial references to the scheme in discussion of other SHLAA sites. You have merely added an assumed number of dwellings at Ashton Park into your calculations as if this strategic scheme were no different from an aggregation of smaller dispersed sites.

We say that your plan is unsound because you have not properly taken account of the strategic nature of the Ashton Park Urban Extension and its associated infrastructure upon which much development elsewhere in the town will rely.

In a single paragraph you write off 1,000 dwellings which until as recently as December 2016 were planned for Ashton Park before 2026, as now undeliverable in the plan period.

"One main reason for a shortfall in land supply is the complexity and consequent delay developing Ashton Park, a south eastern extension to the town. 1,600 dwellings will be built on this site in the plan period and a further 1,000 post 2026; rather than first envisaged that the whole of the allocation would have been completed in the plan period. This can be seen to account for 1,000 of the 1,220 dwelling shortfall."

Based on this one paragraph you propose entirely to reshape Trowbridge to the NE and SW by major building on other greenfield land.

- You fail to provide any details of why this delay is expected.
- You fail to explain why you think that 1,000 homes will not be delivered and we suspect that this round number has been plucked out of the air.
- You fail to explain why 'complexities' at Ashton Park green fields (where a huge amount of strategic planning problem-solving effort has been applied) apparently can be brushed aside in respect of green field to the NE and SW of the town.
- You fail to explain why you have not progressed planning application 15/04736/OUT in over two years since it was submitted.

You have hinted that some of the delay is due to new evidence concerning bats. The Planning Inspector (June 2017) found this not to be the case and said;

	<p>“the presence of bats, including the potential effects upon the SAC and the Bechstein bats maternity roosts were all considered by the Core Strategy inspector. I therefore do not consider that the Council’s trajectory needs to be amended in this regard.”</p> <p>It is clear that the presumed delay in delivery is because the major developer (Persimmon), having not long ago completed their adjacent major Castlemead development, do not see sufficient further demand forthcoming to take Ashton Park homes to market at a faster rate. This is indicated by correspondence from the developer seen by the Planning Inspector.</p> <p>We say that it is perverse and unsound to allocate new greenfield land around Trowbridge for housing for the reason that a principal developer chooses not to build houses on land already allocated because he does not believe he can sell them.</p> <p>You claim that “the plan allocations provide choice and flexibility as well as add to supply”. However this is a hollow claim:</p> <ul style="list-style-type: none"> • You cannot demonstrate that Ashton Park and SHLAA sites 263 and 297 would be built within the plan period by competing developers offering a choice of homes. • There are more similarities between the sites than differences. All are on urban peripheries, all proposed for medium to low density housing, all are distant from facilities and all have similar road links. <p>We say that the addition of a greenfield housing site allocation in the Hilperton Gap cannot be shown to expand choice in any significant way.</p> <p>We say that your plan is unsound because you entirely fail to explain why 1,000 houses cannot be delivered at Ashton Park but can be delivered at Elizabeth Way and Southwick.</p> <p>Changes to the Plan that we propose:</p> <p>a) Add an additional section to your Plan explaining in detail why Ashton Park Urban Extension cannot now be fully delivered in the Plan period and why none of these constraints applies to the other greenfield sites you have proposed for housing around Trowbridge.</p>
<p>Attached files (Please see Objective)</p>	<p>4723700</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>We wish to be available to the Inspector to expand and explain, with further detailed evidence and as he/she may require, the issues that we have raised and the changes to the Plan that we argue for.</p>

Comment ID:	1910	Consultee Mr George Bunting Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Hilperton Gap Action Group Person ID: 895670		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>4. Your Plan is not consistent with national policy because you have failed to encourage use of brownfield sites</p> <p>a) NPPF Core Principle 8 requires planning authorities to “Encourage effective use of land by reusing Brownfield land.” and in Topic Paper 3 you state that “during the Wiltshire Core Strategy period (2006-2015) delivery of brownfield sites have contributed 29% of all housing completions”. You go on to note the much greater emphasis on brownfield in national policy, particularly in the Housing and Planning Act 2016 and the Housing White Paper of February 2017.</p> <p>However, beyond these token acknowledgements, your plan entirely fails to consider any measures to encourage effective use of brownfield, especially in the principal settlement of Trowbridge which is blighted by acres of derelict former industrial land. We object that key documents fail to address brownfield properly or at all:</p> <ul style="list-style-type: none"> • WHSAP Sustainability Appraisal (SA) (296 pages) makes only a one sentence reference to remediation of brownfield in town centres. • The 217 page WHSAP Sustainability Appraisal Report Annex 1 A9 Trowbridge Principal Settlement makes no reference whatsoever to reusing brownfield in the town. • Nor does the TEP Landscape Assessment Part 2. • In the 112 page Community Area Topic Paper – Trowbridge even the word ‘brownfield’ does not appear once! • Topic Paper 4 - Developing Plan Proposals claims that “There are significant brownfield opportunities that are a priority for redevelopment, although this source of housing land is ultimately a modest proportion of overall supply”, failing to understand that while this may be true of the county as a whole it is far from true for the specific urban context of Trowbridge. <p>We say that you have comprehensively failed to fulfil the requirements of NPPF Core Principle 8 to encourage effective use of land by reusing brownfield land and as such your plan is unsound.</p> <p>b) By 31 December 2017, i.e. in parallel with the approval of the WHSAP, you are obliged to produce a register of brownfield sites, some of which can automatically gain permission in principle to develop. However there is no evidence that you are co-ordinating these two closely interdependent pieces of work.</p> <p>We say that your plan is unsound because it fails to take specific account of the upcoming publication of the register of brownfield sites.</p>			

	<p>c) You say that as a general county-wide method you have assumed brownfield sites to be a component of windfall which is only calculated for whole HMAs. However, brownfield sites are obviously much more concentrated in urban areas and Trowbridge (as a former manufacturing centre now de-industrialised) has a disproportionately high quantity of urban brownfield, in particular the town centre Bowyers site and surrounding parcels (capacity up to 200 homes)</p> <p>Further, your windfall calculations include a factor for non-delivery. However, the rate of delivery will be higher for brownfield where there will be in many cases approval in principal to develop.</p> <p>d) The Wiltshire Core Strategy says (bullet point 2) in respect of Trowbridge that, “Town centre growth should be a priority”</p> <p>but you take no specific account of the significant Bowyers brownfield site, which is able to deliver substantial short-term residential development.</p> <p>We say that your treatment of brownfield as a component of windfall, your inappropriate delivery factoring and disregard for urban concentrations is unsound.</p> <p>changes to the Plan that we propose:</p> <p>a) Prepare a new paper, co-ordinated with work you are required to carry out to prepare the Brownfield Land Register, properly to analyse and account for the contribution brownfield can make to the provision of housing sites, especially in de-industrialised urban areas.</p> <p>In the light of assessed brownfield availability, recalculate (across all your Plan documents) the need for new green field space, particularly around Trowbridge urban area.</p>
Attached files (Please see Objective)	4723700
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We wish to be available to the Inspector to expand and explain, with further detailed evidence and as he/she may require, the issues that we have raised and the changes to the Plan that we argue for.

Comment ID:	1911	Consultee Mr George Bunting Chairman Hilperton Gap Action Group Person ID: 895670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5 . Your Plan is not effective because you have made unrealistic assumptions on developer contributions for necessary supporting infrastructure and have failed to show how and when this will be provided</p> <p>You make several references in your plan to the necessity of providing roads, transport, primary and secondary schools, healthcare and business and retail space. This derives from Core Policy 29 of the adopted local plan;</p> <p>“Greenfield housing sites in addition to the strategic sites will only be permitted once improved secondary school provision has been delivered as a result of the Ashton Park urban extension”</p> <p>The census data indicates that the expansion of Trowbridge by the one third indicated by your plan + 5yrs (see Representation 1 above) would be likely to mean:</p> <ul style="list-style-type: none"> • over 13,000 additional people (@ 2.3 people per dwelling) requiring infrastructure and services. • 9,500 additional adults requiring employment. Your analysis implies throughout that homes create jobs. This is evidently fallacious, the reverse being more generally true. • 2,500 additional children (3-17) requiring education. This could require 4 new primary schools (of 275 children) and more than one new secondary school (of 800 children). • 7,500 additional vehicles using Trowbridge roads. Your own analysis shows that some of these are reaching peak capacity at certain junctions. <p>[see map in attached full report]</p> <p>We say that the large increase in dwellings you propose for Trowbridge is unsustainable in the absence of sufficient new jobs, schools and transport links which you have failed to demonstrate will be available or even make reference to in your 4,500 pages (1.3km) of Plan documents.</p> <p>The Wiltshire Infrastructure Delivery Plan 2011 – 2026 (December 2016) lists unfunded infrastructure requirements in Trowbridge, which you say will rely on developer contributions, totalling £65m including £36m on new schools on the south and east sides of the town. The amount of these contributions will be determined by the Community Infrastructure Levy as set out in your charging document. Although CIL would be higher per m2 for the Elizabeth Way and Southwick sites than for Ashton Park, the total CIL realisable for the 800 additional homes (of average new build size of 76 m2) you propose for Trowbridge would be around £3.3m.</p>			

	<p>We say that your plan is unsound because you have stated that new infrastructure is essential to support new homes but failed to demonstrate that it is achievable to provide it.</p> <p>You are proposing that SHLAA sites 263 and 297 (Elizabeth Way, Trowbridge) should be allocated for housing. You acknowledge that “pressure on existing local schools has reached a critical level” and, “In line with the vision for the town and Core Policy 29, additional housing development at the town would need to appropriately contribute towards resolving education capacity deficiencies, particularly at primary level. This could potentially be achieved through development providing an appropriate contribution towards improving local education capacity.”</p> <p>We say that your plan is unsound because the need (as recognised in the Core Strategy) is for new secondary provision to the south and east of Trowbridge, but your proposals for SHLAA sites 263 and 297 identify only primary provision.</p> <p>Changes to the Plan that we propose:</p> <ul style="list-style-type: none"> a) Prepare a new paper to explain in detail the infrastructure that will be required to support the large urban expansion of Trowbridge, when it will be needed and how it will be paid for. b) Adjust the rest of your analysis throughout the Plan to take account of this. c) If you cannot demonstrate that infrastructure will be delivered, adjust your allocation of housing sites to reduce the concentration of these at Trowbridge, in particular removing sites 263 and 297.
Attached files (Please see Objective)	4723700
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We wish to be available to the Inspector to expand and explain, with further detailed evidence and as he/she may require, the issues that we have raised and the changes to the Plan that we argue for.

Comment ID:	1912	Consultee Mr George Bunting Chairman Hilperton Gap Action Group Person ID: 895670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
		Person ID: 895670	Do you consider the draft WHSAP is sound? No	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5 . Your Plan is not effective because you have made unrealistic assumptions on developer contributions for necessary supporting infrastructure and have failed to show how and when this will be provided</p> <p>You make several references in your plan to the necessity of providing roads, transport, primary and secondary schools, healthcare and business and retail space. This derives from Core Policy 29 of the adopted local plan;</p> <p>“Greenfield housing sites in addition to the strategic sites will only be permitted once improved secondary school provision has been delivered as a result of the Ashton Park urban extension”</p> <p>The census data indicates that the expansion of Trowbridge by the one third indicated by your plan + 5yrs (see Representation 1 above) would be likely to mean:</p> <ul style="list-style-type: none"> • over 13,000 additional people (@ 2.3 people per dwelling) requiring infrastructure and services. • 9,500 additional adults requiring employment. Your analysis implies throughout that homes create jobs. This is evidently fallacious, the reverse being more generally true. • 2,500 additional children (3-17) requiring education. This could require 4 new primary schools (of 275 children) and more than one new secondary school (of 800 children). • 7,500 additional vehicles using Trowbridge roads. Your own analysis shows that some of these are reaching peak capacity at certain junctions. <p>[see map in attached full report]</p> <p>We say that the large increase in dwellings you propose for Trowbridge is unsustainable in the absence of sufficient new jobs, schools and transport links which you have failed to demonstrate will be available or even make reference to in your 4,500 pages (1.3km) of Plan documents.</p> <p>The Wiltshire Infrastructure Delivery Plan 2011 – 2026 (December 2016) lists unfunded infrastructure requirements in Trowbridge, which you say will rely on developer contributions, totalling £65m including £36m on new schools on the south and east sides of the town. The amount of these contributions will be determined by the Community Infrastructure Levy as set out in your charging document. Although CIL would be higher per m2 for the Elizabeth Way and Southwick sites than for Ashton Park, the total CIL realisable for the 800 additional homes (of average new build size of 76 m2) you propose for Trowbridge would be around £3.3m.</p>			

	<p>We say that your plan is unsound because you have stated that new infrastructure is essential to support new homes but failed to demonstrate that it is achievable to provide it.</p> <p>You are proposing that SHLAA sites 263 and 297 (Elizabeth Way, Trowbridge) should be allocated for housing. You acknowledge that “pressure on existing local schools has reached a critical level” and, “In line with the vision for the town and Core Policy 29, additional housing development at the town would need to appropriately contribute towards resolving education capacity deficiencies, particularly at primary level. This could potentially be achieved through development providing an appropriate contribution towards improving local education capacity.”</p> <p>We say that your plan is unsound because the need (as recognised in the Core Strategy) is for new secondary provision to the south and east of Trowbridge, but your proposals for SHLAA sites 263 and 297 identify only primary provision.</p> <p>Changes to the Plan that we propose:</p> <ul style="list-style-type: none"> a) Prepare a new paper to explain in detail the infrastructure that will be required to support the large urban expansion of Trowbridge, when it will be needed and how it will be paid for. b) Adjust the rest of your analysis throughout the Plan to take account of this. c) If you cannot demonstrate that infrastructure will be delivered, adjust your allocation of housing sites to reduce the concentration of these at Trowbridge, in particular removing sites 263 and 297.
Attached files (Please see Objective)	4723700
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We wish to be available to the Inspector to expand and explain, with further detailed evidence and as he/she may require, the issues that we have raised and the changes to the Plan that we argue for.

Comment ID:	1913	Consultee Mr George Bunting Chairman Hilperton Gap Action Group Person ID: 895670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
		Person ID: 895670	Do you consider the draft WHSAP is sound? No	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.3 Elizabeth Way		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	6. Your Plan is not effective because you have included a SHLAA site with unregistered land You say in your site deliverability report that “where the land was not registered or where the land title was pending were recorded as having an unknown availability and therefore were removed from further consideration” However, SHLAA site 263 (Land west of Elizabeth Way, Trowbridge) includes unregistered land, indicated on the Land Registry cadastral map by the absence of an Inspire –ID reference number and the absence of a registered title at HM Land Registry. <i>[see map in attached full report]</i> We say that you should remove SHLAA site 263 from the Wiltshire Housing Site Allocations Plan because a substantial portion of this site (south of Middle Lane) is not registered at HM Land Registry. This site should not have been considered at all because you were told by the developer offering it that it is in “Multiple or <u>unknown</u> ownership”. Changes to the Plan that we propose: a) Remove SHLAA site 263 from allocation for housing.			
	11. Your plan is not justified because you have failed to declare in your plan that you have a vested interest in allocating agricultural land that you own for development SHLAA site 297 (approx. 2.4 ha) is owned by WC and has been enjoyed for community use for many decades. You fail to mention anywhere in the Draft WHSAP that you own this land and stand to gain about £2.5m from a change of use from agriculture to housing. In fact, since the first SHLAA call for sites in 2012 (when you offered the site anonymously) we are not aware that you have ever declared this conflict of interest. We say that you must publicly declare this vested interest, justify why you may potentially dispose of this community land to a private sector developer and enable proper accountability for its future use. At least until this is properly completed we say that you should withdraw SHLAA site 297 from your plan.			

	Changes to the Plan that we propose: a) Add a statement to your Plan declaring that your interest in SHLAA site 297, the amount of money you stand to gain from development and the process you intend to follow to gain community approval for disposing of it.
Attached files (Please see Objective)	4723700
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We wish to be available to the Inspector to expand and explain, with further detailed evidence and as he/she may require, the issues that we have raised and the changes to the Plan that we argue for.

Comment ID:	1914	Consultee Mr George Bunting Chairman Hilperton Gap Action Group Person ID: 895670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.3 Elizabeth Way			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>8. Your Plan is not justified because it conflicts with Wiltshire Core Strategy settlement policy and recently confirmed settlement boundaries</p> <p>You have confirmed settlement boundaries – and then ignored them. The Wiltshire Core Strategy – the adopted local plan – determines that,</p> <p>(para 4.13) “The settlement boundaries of the Principal Settlements, Market Towns, Local Service Centres and Large Villages, as defined by former District Local Plans, will be carried into this strategy and retained. These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the council’s Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were established.”</p> <p>(para 4.15) “At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within settlement boundaries.”</p> <p>Settlement boundaries were fixed in 2016 after a two year process of review culminating in formal approval by Wiltshire Council. The Council was offered an option to move land west of Elizabeth Way from Hilperton village into Trowbridge town (Scheme 25), see below.</p> <p><i>[see map in attached full report]</i></p> <p>This proposal was specifically rejected by Wiltshire Council and the land west of Elizabeth Way, it was explicitly decided, will remain in Hilperton.</p> <p>You have confirmed this decision in Wiltshire Housing Site Allocations Plan.</p> <p>In August 2017 a planning appeal in respect of another site near Hilperton Large Village was dismissed because:</p> <p>“21. I therefore conclude on this issue [the suitability of location for dwellings] that the proposal would not accord with policies CP1 and CP2 in terms of its location outside of the defined limits of development.”</p> <p>(The other reasons for dismissal were that para.47 of the NPPF did not apply and the development would cause unacceptable harm to the character of the area).</p>			

We say that your plan is unsound because you (a) have restated that Trowbridge town will not incorporate part of Hilperton, (b) have made it a point of planning principle that development in Large Villages will focus on small sites, and yet (c) have proposed sites 263 & 297 (totalling 20.5ha) which would involve development on greenfield outside the Trowbridge principal settlement and within the boundaries of Hilperton Large Village.

Changes to the Plan that we propose:

- a) Remove SHLAA sites 263 and 297 from allocation for housing.

9. Your plan is not positively prepared because you have ignored Planning Examination findings the basis for which have not changed

Over ten years ago the Planning Inspector determined;

“2.2.48 I appreciate that the proposed Hilperton Relief Road is intended to cross this land [the Gap] broadly from north-west to south-east. Although the precise alignment of the road is not formally before me, a draft scheme has been drawn up and was presented to the inquiry. From this and my own observations, I cannot imagine that substantial earthworks would be needed to accommodate the road, wherever its precise route lay, so that its impact in the landscape might not be great. In these circumstances I do not believe that it would, if built here, appear as a more convincing boundary to the town than the existing development.

2.2.49 An alternative boundary to the town policy limit further to the east would enable development to take place on the land so enclosed. This would extend Trowbridge into open land having a reasonably pleasant appearance and would in my opinion harm the semi-rural character and appearance of the area as open fields were replaced by built development of one form or another. It would also erode the gap between Trowbridge and Hilperton.”

(The settlement boundary has been re- confirmed by WC in 2017)

In 2009 when the West Wiltshire District Plan was still adopted policy (R5), the Council sought (PIC129) “to bring forward a new recreational allocation nearer and more accessible to the people of Trowbridge ... There are opportunities to make better use of urban fringe locations to increase access to the countryside [and] maximise access to the countryside for active and passive recreation.”

[see map in attached full report]

The Planning Inspector required you to publish an explanation of how and why this policy has not been carried forward in the Core Strategy. You have failed to do this.

We say that your current plans should take account of the findings of Planning Examinations where the basis of these findings has not changed.

Changes to the Plan that we propose:

- a) Add a section to your Plan to meet the requirements of the Planning Inspector.

Attached files (Please see Objective)

4723700

If your representation is seeking a change, do you

We wish to be available to the Inspector to expand and explain, with further detailed evidence and as he/she may require, the issues that we have raised and the changes to the Plan that we argue for.

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	1915	Consultee Mr George Bunting Chairman Hilperton Gap Action Group Person ID: 895670	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
		Person ID: 895670	Do you consider the draft WHSAP is sound? No	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>10. Your Plan is not positively prepared because you have made unrealistic and unsubstantiated assumptions on building density.</p> <p>You have proposed SHLAA sites 263 and 297 for housing and stated that these would provide sites for 255 dwellings, reduced to 205 after 'mitigation'. These sites have a combined area of approx. 20.5 ha which would provide a net housing density of 10 per hectare.</p> <ul style="list-style-type: none"> This is only about one third of typical modern developments and indicates a highly wasteful use of precious green field space. A speculative developer (HGT Developments Lp) has already applied to develop houses on the northern part of SHLAA site 263, an area of about 8.5ha partially in a flood zone. After 18 months of negotiation with you he is asking for approval for 170 dwellings, i.e. a density of 20 dwellings/ha which would provide, were it to be approved, 80% of the dwellings expected of SHLAA 263 on 40% (and most difficult part) of the site. You yourself offered SHLAA site 297, which you own, claiming that it alone could accommodate 74 dwellings.²⁴ <p>We say that your calculations are clearly unsound. Either only about one third of these SHLAA sites is needed to provide the 205 dwellings you say is required or you have deliberately underestimated the number that will be built in an attempt to assuage fierce local opposition to development in the Gap.</p> <p>Changes to the Plan that we propose:</p> <p>a) Add detailed calculations to your Plan of how you have arrived at a capacity of 205 dwellings on SHLAA sites totalling 20.5ha.</p>			
Attached files (Please see Objective)	4723700			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We wish to be available to the Inspector to expand and explain, with further detailed evidence and as he/she may require, the issues that we have raised and the changes to the Plan that we argue for.			

Comment ID:	1916	Consultee Ms B Hickman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 447918	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Land on the south side of Harnham Rd			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing as a private resident, in respect of the above planning application. I have seen reports and comments on this proposal in The Salisbury Journal.</p> <p>There is land on the south side of Harnham Rd which links with Netherhampton Road which could be developed for people in need of housing including social housing. I would support this, provided there is adequate green space and footpaths. There are genuine concerns re infrastructure but, in my opinion we need to put the needs of those without adequate access to housing before concerns re traffic etc expressed by those who are already sitting comfortably in their own homes. There is a need for better public transport (buses and cycle lanes) locally and this would need to be integrated into any new housing development. We have a ring road of a kind but no ring road bus service which could link Harnham with Netherhampton with Wilton etc. But there are other possibilities including a local congestion charge within the ring road to reduce the number of local journeys made into the city.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1917	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Here are my concerns regarding the proposals to develop housing in Trowbridge. I live in the area of Church Lane and Southwick Court and am concerned about the plans to develop sites 1021, 3260 and 3565.</p> <p>The proposed housing allocation for 6,000 new homes identified for Trowbridge is too high compared with the allocation for other locations in Wiltshire towns and villages. Trowbridge should not carry the development burden for Wiltshire. Ashton Park already has 2,000 houses built with 2,600 further to be built by 2026. A two year delay caused by a debate over bats in the woods means the extra housing will not be built by the deadline. The new site proposals, identified in the consultation documents are to meet this shortfall.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1918	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>However these new sites are not large enough to require the developers to provide infrastructure such as schools and healthcare. This infrastructure need will not be met unless the West Ashton site is fully developed. This site already has a new road and would meet these requirements. Smaller sites on green fields must not be used as a replacement.</p> <p>Clearly increase in people occupying the proposed 6,000 new homes around Trowbridge will have an impact of medical services in the town. The 4 GP surgeries are already close to capacity and there are sometimes difficulties in getting appointments. The hospital does not provide 24 hour emergency care which means going to Bath Royal United if emergency treatment is needed. It is well known locally that a man who had been stabbed died outside the hospital as it was closed to emergency treatment earlier this year. Currently there is no information regarding the role of Trowbridge Primary Care Centre, opening when the hospital closes.</p> <p>Trowbridge Fire Station is only manned during the day with only 2 fire engines.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1919	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>However these new sites are not large enough to require the developers to provide infrastructure such as schools and healthcare. This infrastructure need will not be met unless the West Ashton site is fully developed. This site already has a new road and would meet these requirements. Smaller sites on green fields must not be used as a replacement.</p> <p>Clearly increase in people occupying the proposed 6,000 new homes around Trowbridge will have an impact of medical services in the town. The 4 GP surgeries are already close to capacity and there are sometimes difficulties in getting appointments. The hospital does not provide 24 hour emergency care which means going to Bath Royal United if emergency treatment is needed. It is well known locally that a man who had been stabbed died outside the hospital as it was closed to emergency treatment earlier this year. Currently there is no information regarding the role of Trowbridge Primary Care Centre, opening when the hospital closes.</p> <p>Trowbridge Fire Station is only manned during the day with only 2 fire engines.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1920	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>However these new sites are not large enough to require the developers to provide infrastructure such as schools and healthcare. This infrastructure need will not be met unless the West Ashton site is fully developed. This site already has a new road and would meet these requirements. Smaller sites on green fields must not be used as a replacement.</p> <p>Clearly increase in people occupying the proposed 6,000 new homes around Trowbridge will have an impact of medical services in the town. The 4 GP surgeries are already close to capacity and there are sometimes difficulties in getting appointments. The hospital does not provide 24 hour emergency care which means going to Bath Royal United if emergency treatment is needed. It is well known locally that a man who had been stabbed died outside the hospital as it was closed to emergency treatment earlier this year. Currently there is no information regarding the role of Trowbridge Primary Care Centre, opening when the hospital closes.</p> <p>Trowbridge Fire Station is only manned during the day with only 2 fire engines.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1921	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed allocation for the land at Southwick [3260 and 3565] and by the Country Park [1021] will have a negative impact on the existing town and countryside and ruin the character of the area with loss of green fields and lead to the urbanisation of the area between Southwick and Trowbridge.</p> <p>The proposals at 3565, 3620 and 1021 will mean a loss of this countryside, a buffer between the village of Southwick and Trowbridge adding to the urbanisation encroaching on Southwick from Trowbridge.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1922	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Existing empty buildings and sites in the town where planning permission has lapsed should be upgraded and developed rather than use open this countryside. The Trowbridge Area Core Strategy makes no mention of the much needed development of the near empty town centre. The council has discounted a number of previously developed brownfield sites on the basis that they are within the existing settlement boundary. Potential housing sites including Bowyers, the old library and former site of West Wiltshire offices on Bradley Road have not been included in the Core Strategy. If these sites had been included, the proposed development of open countryside sites would not be needed. The question is: why are these sites not being developed before open countryside is touched? It would seem that Greenfield sites are preferred over the many brownfield sites in the town. This is not sustainable development but “developer friendly sites”. It appears that Wiltshire Councillors, none of whom live in Trowbridge, have not taken into consideration the value to the people of Trowbridge of open countryside on the outskirts of the town.				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1923	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed allocations at 1021, 3565 and 3620 are close to the frequently flooded Lambrok Stream. [These photographs were taken in March 2014 from adjacent to 3620]. [see photographs in attached full report]</p> <p>Local residents and visitors to the Country Park will know that the area is waterlogged during winter months with some paths and bridges inaccessible for weeks. Given the progress of global warming and climate change, there will be an increasing risks of flooding during the summer as well as winter. There have been a number of recent warnings from the Environment Agency to residents adjacent to the Lambrok Stream regarding the risk of flooding after heavy rain. Hard surfaces in any new development mean the loss of ground to absorb water and a swifter run off into the stream. Any detritus in the run off would mean a risk of blocking the stream flow causing further flooding. This will be a risk to both new and existing housing. [see photographs in attached full report]</p> <p>There used to be a brickfield on site 3260 and the land continues to hold clay which results in poor drainage and frequent flooding after heavy rain. A condition of any developments close to the Lambrok Stream must be that the developer compensates future flood victims in these areas. [The left photo taken in 2016 from the Frome Road showing flooding to the Old Brickfields and right, in the Country Park]. [see photographs in attached full report]</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1924	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed allocations at 1021, 3565 and 3620 are close to the frequently flooded Lambrok Stream. [These photographs were taken in March 2014 from adjacent to 3620]. [see photographs in attached full report]</p> <p>Local residents and visitors to the Country Park will know that the area is waterlogged during winter months with some paths and bridges inaccessible for weeks. Given the progress of global warming and climate change, there will be an increasing risks of flooding during the summer as well as winter. There have been a number of recent warnings from the Environment Agency to residents adjacent to the Lambrok Stream regarding the risk of flooding after heavy rain. Hard surfaces in any new development mean the loss of ground to absorb water and a swifter run off into the stream. Any detritus in the run off would mean a risk of blocking the stream flow causing further flooding. This will be a risk to both new and existing housing. [see photographs in attached full report]</p> <p>There used to be a brickfield on site 3260 and the land continues to hold clay which results in poor drainage and frequent flooding after heavy rain. A condition of any developments close to the Lambrok Stream must be that the developer compensates future flood victims in these areas. [The left photo taken in 2016 from the Frome Road showing flooding to the Old Brickfields and right, in the Country Park]. [see photographs in attached full report]</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1925	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed allocations at 1021, 3565 and 3620 are close to the frequently flooded Lambrok Stream. [These photographs were taken in March 2014 from adjacent to 3620]. [see photographs in attached full report]</p> <p>Local residents and visitors to the Country Park will know that the area is waterlogged during winter months with some paths and bridges inaccessible for weeks. Given the progress of global warming and climate change, there will be an increasing risks of flooding during the summer as well as winter. There have been a number of recent warnings from the Environment Agency to residents adjacent to the Lambrok Stream regarding the risk of flooding after heavy rain. Hard surfaces in any new development mean the loss of ground to absorb water and a swifter run off into the stream. Any detritus in the run off would mean a risk of blocking the stream flow causing further flooding. This will be a risk to both new and existing housing. [see photographs in attached full report]</p> <p>There used to be a brickfield on site 3260 and the land continues to hold clay which results in poor drainage and frequent flooding after heavy rain. A condition of any developments close to the Lambrok Stream must be that the developer compensates future flood victims in these areas. [The left photo taken in 2016 from the Frome Road showing flooding to the Old Brickfields and right, in the Country Park]. [see photographs in attached full report]</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1926	Consultee Mrs Sally Walker Person ID: 1106467	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Trowbridge already has traffic congestion problems. Public transport and safe cycling is already minimal. Increased traffic will conflict with the areas low carbon energy proposals. The proposal to build 200 houses on sites 3565, 3620 and 1021, given that most houses have more than one vehicle, will mean further traffic particularly at peak times on the already congested A361 Frome Road. At peak times the traffic is already slowed by the volume going to the college at the traffic lights; and then to the school and town centre. The traffic sensing equipment in place over the summer will give an unrealistic measure of movement given the reduction during schools' and others holiday period. Further access points from the Frome Road to these proposed sites will only make matters worse, even with a change in the current speed restrictions. There is no evidence to justify the Council's view that sustainable development can be made on this side of the town given the current infrastructure or setting.</p> <p>Given there are proposals to also develop site 3565, there is a distinct possibility for a 'rat run' with vehicles from the south east of the town cutting through to and from Bradley Road, to avoid the queues at the traffic lights at College Road and Frome Road, in order to access Bath or other areas to the west of the town if these sites are joined by a through road.</p> <p>The increased traffic will impact on air quality in the area with increased carbon emissions, greenhouses gasses and noise pollution. The increased traffic will also impact on the village of Rode in Somerset on the A361, which narrows considerably through this part of the village, with housing close to the road.</p> <p>Southwick Country Park is well used by local people. The Park is also used for running and parking along the Frome Road when the car park is full often means traffic delays.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1927	Consultee Mrs Sally Walker Person ID: 1106467	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Trowbridge already has traffic congestion problems. Public transport and safe cycling is already minimal. Increased traffic will conflict with the areas low carbon energy proposals. The proposal to build 200 houses on sites 3565, 3620 and 1021, given that most houses have more than one vehicle, will mean further traffic particularly at peak times on the already congested A361 Frome Road. At peak times the traffic is already slowed by the volume going to the college at the traffic lights; and then to the school and town centre. The traffic sensing equipment in place over the summer will give an unrealistic measure of movement given the reduction during schools' and others holiday period. Further access points from the Frome Road to these proposed sites will only make matters worse, even with a change in the current speed restrictions. There is no evidence to justify the Council's view that sustainable development can be made on this side of the town given the current infrastructure or setting.</p> <p>Given there are proposals to also develop site 3565, there is a distinct possibility for a 'rat run' with vehicles from the south east of the town cutting through to and from Bradley Road, to avoid the queues at the traffic lights at College Road and Frome Road, in order to access Bath or other areas to the west of the town if these sites are joined by a through road.</p> <p>The increased traffic will impact on air quality in the area with increased carbon emissions, greenhouses gasses and noise pollution. The increased traffic will also impact on the village of Rode in Somerset on the A361, which narrows considerably through this part of the village, with housing close to the road.</p> <p>Southwick Country Park is well used by local people. The Park is also used for running and parking along the Frome Road when the car park is full often means traffic delays.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1928	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Trowbridge already has traffic congestion problems. Public transport and safe cycling is already minimal. Increased traffic will conflict with the areas low carbon energy proposals. The proposal to build 200 houses on sites 3565, 3620 and 1021, given that most houses have more than one vehicle, will mean further traffic particularly at peak times on the already congested A361 Frome Road. At peak times the traffic is already slowed by the volume going to the college at the traffic lights; and then to the school and town centre. The traffic sensing equipment in place over the summer will give an unrealistic measure of movement given the reduction during schools' and others holiday period. Further access points from the Frome Road to these proposed sites will only make matters worse, even with a change in the current speed restrictions. There is no evidence to justify the Council's view that sustainable development can be made on this side of the town given the current infrastructure or setting.</p> <p>Given there are proposals to also develop site 3565, there is a distinct possibility for a 'rat run' with vehicles from the south east of the town cutting through to and from Bradley Road, to avoid the queues at the traffic lights at College Road and Frome Road, in order to access Bath or other areas to the west of the town if these sites are joined by a through road.</p> <p>The increased traffic will impact on air quality in the area with increased carbon emissions, greenhouses gasses and noise pollution. The increased traffic will also impact on the village of Rode in Somerset on the A361, which narrows considerably through this part of the village, with housing close to the road.</p> <p>Southwick Country Park is well used by local people. The Park is also used for running and parking along the Frome Road when the car park is full often means traffic delays.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1929	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is no mention in the Core strategy of archaeological surveys of the site near to Southwick Court given it's age and important local historical significance. The sites 1021 and 3620 include at least 5 listed buildings as well as an archaeological site of an ancient water meadow. These will need to be protected as stated in the National Planning Framework and Core Strategy.				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1930	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is no mention in the Core strategy of archaeological surveys of the site near to Southwick Court given it's age and important local historical significance. The sites 1021 and 3620 include at least 5 listed buildings as well as an archaeological site of an ancient water meadow. These will need to be protected as stated in the National Planning Framework and Core Strategy.				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1931	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The sites 1021 and 3620 provide far reaching views over the local open countryside.				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1932	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The sites 1021 and 3620 provide far reaching views over the local open countryside.				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1933	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>They provide habitat for deer, rare bats, rabbits, voles and various different birds. This summer there is anecdotal evidence of bats sighted in the gardens adjacent to the site 3620 on numerous occasions. However it is not known whether these are Bechstein's bats identified in records of the area.</p> <p>[see photographs in attached full report]</p> <p>The hedges surrounding the fields [1021, 3260 and 3565] have been in the same alignment since at least 1890 [see OS map below]. These fields have been used for grazing for at least the last 30 years.</p> <p>[see map extract in attached full report]</p> <p>There are a number of mature trees along the Lambrok Stream running through and adjacent to sites 3260 and 3565. These trees provide roosting and food habitat for numerous birds and help to reduce ground water levels during heavy rain. When there was development of land adjacent to site 3565: Silver Meadows, the developers took out some of the mature trees along the stream. It is not known whether remaining trees are protected.</p> <p>In conclusion, any development on the sites 1021, 3260 and 3565 will mean an irreversible loss of open countryside; create more traffic nuisance, pollution and noise to the area and indeed the town centre. Trowbridge must not be burdened with the greater number of house building allocation for Wiltshire.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1934	Consultee Mrs Sally Walker	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1106467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>They provide habitat for deer, rare bats, rabbits, voles and various different birds. This summer there is anecdotal evidence of bats sighted in the gardens adjacent to the site 3620 on numerous occasions. However it is not known whether these are Bechstein's bats identified in records of the area.</p> <p>[see photographs in attached full report]</p> <p>The hedges surrounding the fields [1021, 3260 and 3565] have been in the same alignment since at least 1890 [see OS map below]. These fields have been used for grazing for at least the last 30 years.</p> <p>[see map extract in attached full report]</p> <p>There are a number of mature trees along the Lambrok Stream running through and adjacent to sites 3260 and 3565. These trees provide roosting and food habitat for numerous birds and help to reduce ground water levels during heavy rain. When there was development of land adjacent to site 3565: Silver Meadows, the developers took out some of the mature trees along the stream. It is not known whether remaining trees are protected.</p> <p>In conclusion, any development on the sites 1021, 3260 and 3565 will mean an irreversible loss of open countryside; create more traffic nuisance, pollution and noise to the area and indeed the town centre. Trowbridge must not be burdened with the greater number of house building allocation for Wiltshire.</p>				
Attached files (Please see Objective)	4723757				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1935	Consultee Mrs Charlotte Bullock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131233	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my concerns about the proposed allocation of an additional 40 houses to the village of Crudwell on the Ridgeway Farm site as detailed in the draft Wiltshire Site Allocations Plan.</p> <p>I have lived in Crudwell for five years and understand from locals that there have been a number of new build housing projects in recent years, as a means of sustaining the viability of the village. With this sympathetic approach, the addition of small numbers of houses every few years, the character of the village has not been spoilt and the Conservation area has not been threatened.</p> <p>In 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same:</p> <ul style="list-style-type: none"> • The scale of the development - it was much larger than previous developments in the village. • The proposed development is too large and outside of the designated red line settlement boundary for the village, as well as encroaching on viable farmland. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1936	Consultee Mrs Charlotte Bullock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131233	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same:</p> <ul style="list-style-type: none"> • the strain on the village drainage and sewage system which is already inadequate for the number of properties it attempts to support. • Increased flooding risk to Tetbury Lane and the village as a whole. In the time we have lived in the village we have witnessed Tetbury Lane flooding on several occasions during periods of heavy rainfall. Water actually “fountains up” out of drains as they fail to cope with the volume of water. Walking our children along the lane to school we have been drenched by passing traffic as vehicles drive inconsiderately fast through puddles and surface road water. Any new development will add both to the surface water on areas of tarmac as well as the inadequate sewerage system which fails to cope in periods of heavy rain. <p>Crudwell still has severe flooding problems which have not yet been completely addressed, it remains a major concern to people who live in properties around the Swillbrook which runs through the centre of the village. Many have experienced significant damage to their homes in recent years both through surface water and raw sewerage and I believe surface water from the proposed site would only make this situation worse. Many homes - including in The Butts cul de sac where I live, already need non-return valves to stay safe from sewerage flooding until the excess over capacity subsides.</p> <p>It is vital that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind – please re-consider Crudwell.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1937	Consultee Mrs Charlotte Bullock	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131233		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same:</p> <ul style="list-style-type: none"> Increased traffic in Tetbury Lane and the busy A429 causing further risk to pedestrians, bike and horse riders and vehicles. This lane is narrow and has stretches with no pavement, making walking to and from the facilities at the village hall to the rest of the village/school etc difficult and dangerous. <p>As there is no immediate strategic need for any housing allocations at Crudwell, I would like to see the Neighbourhood Plan group given the opportunity to consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward. Where are the residents of these 50 (10 + 40) houses going to work? Being in a village with poor public transport links, they will all have at least one car.</p> <p>It is vital that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind – please re-consider Crudwell.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1938	Consultee Mrs Charlotte Bullock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131233	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same:</p> <ul style="list-style-type: none"> The village school is full to capacity and would not be able to take additional pupils without significant investment in buildings and staff, never mind potentially worsening the parking issues at school pick up and drop off. <p>I am not against the present development of 10 houses on the footprint of the old farm yard as it is certainly better than what was there before (the landowner having chosen to leave the buildings fall into disrepair and deteriorate), it made good use of an existing "brownfield" site and is of a scale consistent with other recent developments in the village. However against this backdrop, I am shocked to see the draft allocation of an additional 40 houses on this site which was previously deemed unsuitable.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1939	Consultee Mrs Charlotte Bullock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131233	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my concerns about the proposed allocation of an additional 40 houses to the village of Crudwell on the Ridgeway Farm site as detailed in the draft Wiltshire Site Allocations Plan.</p> <p>I have lived in Crudwell for five years and understand from locals that there have been a number of new build housing projects in recent years, as a means of sustaining the viability of the village. With this sympathetic approach, the addition of small numbers of houses every few years, the character of the village has not been spoilt and the Conservation area has not been threatened.</p> <p>I am not against the present development of 10 houses on the footprint of the old farm yard as it is certainly better than what was there before (the landowner having chosen to leave the buildings fall into disrepair and deteriorate), it made good use of an existing "brown field" site and is of a scale consistent with other recent developments in the village. However against this backdrop, I am shocked to see the draft allocation of an additional 40 houses on this site which was previously deemed unsuitable.</p> <p>I also do not think that the allocation is justified when you look at your own guidance or notes within the Site allocations Plan. This states that housing sites will only be allocated where there is a strategic priority to do so. From the data available, the Site Allocation Plan currently results in an oversupply of some 4,300 dwellings to 2026 when you take into account past completions with deliverable commitments and windfall sites; even excluding windfall sites, the oversupply is still 2,200 across the housing market area. More specifically, the Site Allocations Plan results in an oversupply of some 100 homes in the Malmesbury Community Area; Wiltshire Council also has a history of oversupply of dwellings - in eight of the last ten years, more homes have been built than planned and over that period the oversupply has been over 140% of target.</p> <p>On that basis there is no strategic need or justification to allocate new homes in Crudwell and the Draft Site Allocations Plan should not do so. I am also concerned that the site size / boundary of the Ridgeway Farm Development encompasses an area far greater than is required - even for 40 homes - so I question why that is the case and would like it reviewed.</p> <p>As there is no immediate strategic need for any housing allocations at Crudwell, I would like to see the Neighbourhood Plan group given the opportunity to consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward. Where are the residents of these 50 (10 + 40) houses going to work? Being in a village with poor public transport links, they will all have at least one car.</p> <p>Policy 1 of the Wiltshire Core Strategy notes that the "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", given that we have circa 250 homes in Crudwell, I do not see how an additional 40 homes on top of the 10 already being built - a staggering 20% increase overall - even falls within Wiltshire Councils own Core strategy.</p>				

	<p>This site allocation if allowed to stand would, in my opinion, completely change the character of the village and undo many years sensible and sensitive development supported by the Parish Council and the planning teams at Wiltshire Council. I am not anti-development but I do favour sensible, incremental development.</p> <p>It is vital that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind – please re-consider Crudwell.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	1940	Consultee Mrs Lindsey Wood Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Kilmington Parish Council Person ID: 468232		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Kilmington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I can confirm that the above consultation document was considered at a recent meeting by Kilmington Parish Council. The Parish Council has asked me to point out that due to the settlement strategy set out in Core Policy 1 and the fact that the village has no Housing Settlement Boundary as it is regarded as non-sustainable, the village is at risk of becoming a dormitory village full of elderly people with no younger people around to look out for them. Kilmington has a village school that is in imminent danger of closing because there are very few young people left in the village. Rural businesses in the area struggle to find employees. Whilst members accept the fact that it would be wholly inappropriate to encourage any large-scale development within the village, the current limitations would appear to prohibit any form of development for local workers and younger families other than via an Exception Policy. The Parish Council would like to see some relaxation in the policies in order to allow some minor low-key development for local employees and young people.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1941	Consultee Peter Little Person ID: 1131243	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am expressing concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocation Plan.</p> <p>Together with the 10 dwellings already being built on this site, this represents a near 20% increase in dwellings in the village of Crudwell (currently some 260 dwellings).</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so. However, the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell.</p> <p>A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p> <p>Policy 1 of Wiltshire’s Core Strategy states that “Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities”, but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So, this aspect of the Plan is not consistent with the Strategy.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met</p> <p>Crudwell is not anti-development; it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan.</p> <p>Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell having taken full account of parishioners’ wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.</p> <p>Crudwell in not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	1942	Consultee Peter Little	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131243	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am expressing concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocation Plan.</p> <p>Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.</p> <p>Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1943	Consultee Peter Little	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131243		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am expressing concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocation Plan.</p> <p>Crudwell Primary School is already greatly over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields. The school's ability to expand is not guaranteed</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.</p> <p>Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1944	Consultee Peter Little	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131243	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am expressing concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocation Plan.</p> <p>There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.</p> <p>Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1945	Consultee Jacqueline Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131251		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a resident of Crudwell, I would like to register my concern about the proposal to build 40 new homes on the Ridgeway Farm site. The site has already received permission to build 10 homes which are currently under construction, however, if the proposal for a further 40 homes is passed then it represents an almost 20% increase to the existing housing stock in Crudwell and will severely impact the village ambience. I understand that the Draft Site Allocations Plan states that housing sites will only be allocated to villages where there is a strategic need to do so but as the Plan also forecasts an oversupply in the Malmesbury Community Area this surely means that Crudwell does not fulfil that criteria. I also understand that there is a similar level of oversupply forecast across the wider housing market area in North and West Wiltshire.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1946	Consultee Marcus Morrish	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130616		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Probably my greatest concern relates to the infrastructure. Salisbury is creaking at the seams, and has been for a long time, when it comes to the road network. Due to the geography of the area and the confluence of the 5 rivers, Salisbury is at the centre of a major intersection for the A338, A30 and A36, with undoubtedly the most dated road infrastructure in the county. The A3094 suffers from a bottleneck at both ends, the Wilton Wall traffic light junction and the Harnham gyratory, and struggles with existing traffic levels let alone the additional traffic associated with another 750 to 1300 dwellings! The infrastructure is not in place and there do not appear to be any plans of substance to provide it. I do not feel these two sites are supportable at the current time.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1947	Consultee Marcus Morrish	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1130616	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>As a long-time resident of the Harnham area of Salisbury, 25 years, I would like to provide you with feedback on the proposed Wiltshire Housing Site Allocation Plan, pertaining to this area of Salisbury, namely H3.1 & H3.3</p> <p>I am not in a position to comment on the technicalities of the Plan and whether they are legally compliant but would like to comment on practical considerations.</p> <p>The practical effect of backing these two site is to extend the boundary of Salisbury westwards. Although H3.1 and H3.3 are not within the boundary of Netherhampton Village, they fall under the scope of Netherhampton Parish Council and will bring closer the day when Netherhampton Village loses its identity and becomes just another area of Salisbury. The boundary of Salisbury needs to be carefully controlled so as to maintain the character of the City as it is at present.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1948	Consultee Jacqueline Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131251		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The village has begun the process of producing a Neighbourhood Plan, a part of which will be to undertake a survey to determine what needs exist for housing and how they should be met. Crudwell is not anti-development but clearly as a community we would like to be involved in determining what those needs are.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1949	Consultee Jacqueline Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131251		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I would also like to draw your attention to the fact that this additional development would place a strain on existing facilities and services, not to mention the safety implications of increased traffic on Tetbury Lane which is narrow with limited paving and is used by many villagers accessing the Village Hall and play facilities.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1950	Consultee Jacqueline Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131251	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I would also like to draw your attention to the fact that this additional development would place a strain on existing facilities and services, not to mention the safety implications of increased traffic on Tetbury Lane which is narrow with limited paving and is used by many villagers - including children - accessing the Village Hall and play facilities.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1951	Consultee Neil Cowley Castlewood Properties Ventures Ltd Person ID: 1130978	Agent Mr Christopher Roberts Planner Turley Person ID: 1131263	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H1.2				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>LAND AT UNDERHILL NURSERY, MARKET LAVINGTON</p> <p>On behalf of our client, Castlewood Property Ventures Ltd., we write to provide representations to the pre-submission draft Wiltshire Housing Site Allocations Plan consultation. The landowners for the site have also prepared a separate representation, which confirms their intention to work in partnership to deliver a holistic development, which allows for a number of different vehicular access options. This response has been prepared with regard to our client's land interests at Underhill Nursery, Market Lavington. Our client's site is located outside of, but adjoining, the existing settlement boundary of Market Lavington. This settlement is a Local Service Centre, situated within the Devizes Community Area and located in the East Wiltshire Housing Market Area (HMA). This representation sets out our concerns with the approach taken towards the allocation of housing sites and overarching strategy set out within the draft Wiltshire Housing Site Allocations DPD. The scope of these representations is however focused on the proposed strategy for the East Wiltshire HMA, the Devizes Community Area and Market Lavington specifically. Accordingly, any comments or observations made are done so without prejudice to any future representations.</p> <p>The Intention of the DPD and Spatial Strategy</p> <p>The spatial strategy within the DPD is, in summary, to allocate enough housing sites to fulfil the 'residual' housing requirement set by the 2015 Wiltshire Core Strategy in each Community Network Area. For the Eastern HMA, further housing allocations are identified in the draft Plan at Tidworth (where 270 dwellings are proposed at Empress Way, Ludgershall). A number of other allocations are proposed at Market Lavington; Southcliffe (15 units), East of Lavington School (15 units) and Underhill Nursery where a further 50 dwellings are proposed at Allocation Policy Ref. H1.2.</p> <p>The second bullet of paragraph 1.1 of the draft Plan states that its purpose is to;</p> <p>"Allocate new sites or housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the plan period to 2026."</p> <p>Paragraph 1.4 of the draft DPD then goes on to reference the Wiltshire Core Strategy's intention to;</p> <p>"...ensure a sufficient choice and supply of suitable sites through the plan period in accordance with national policy..."</p> <p>Paragraph 2.3 of the document then acknowledges the imperative of national planning policy, in stressing that;</p> <p>"...the Plan must involve a degree of flexibility and pragmatism to ensure a steady overall supply of enough land for housing development".</p> <p>It is considered that the broad purposes and intentions of the draft DPD (as described above) are reasonable and justified, in relation to the East Wiltshire HMA and the Devizes Community Area (although not in relation to other parts of Wiltshire). However, for the reasons we identify below, we do not believe that the Plan (as currently prepared) will realise its stated objectives. We therefore do not consider that the Plan will be effective.</p> <p>Five Year Supply and Housing Provision in the East Wiltshire HMA</p>				

It is considered that the Council is able to demonstrate a five year supply of land for housing in the Eastern HMA, applying a 5 percent buffer ('to ensure competition and choice') and using the Liverpool Method to determine the treatment of shortfall.

However, it is notable that annualised completions in this HMA typically fall below the annualised requirement, with a deficit having occurred during 6 of the previous 11 monitoring years (which comprises the Plan period to date) and 6 of the past 8 years (See attached Appendix 1). In view of this persistent record of under delivery, there is a growing case for the application of a 20 percent buffer. Likewise, the PPG is clear that the Sedgfield Method is the most appropriate method for addressing any undersupply.

Furthermore, the current approach of the DPD wrongly assumes 100 percent delivery of existing commitments to deliver the 'residual' housing requirement, without taking into account any lapse of those planning permissions, and not ensuring a suitable buffer of sites above that residual requirement.

Given the above, and in accordance with the NPPF, we consider that additional land should be identified, in order to provide over and above the 'residual' housing requirement in the East Wiltshire HMA. This is in order to provide a realistic prospect of achieving the requisite housing supply and ensure choice and competition in the market for land. This approach will ensure that the Plan's objective to sustain a five year supply of land across the plan period is met and corresponds to the NPPF's stated aim of significantly boosting the supply of housing.

Crucially, there would be no ensuing harm from this approach, as the housing requirement in Wiltshire is (explicitly) expressed as a minimum, not a maximum, and cannot therefore be considered a cap to sustainable development. We suggest that to plan positively to ensure future development needs are met, additional land should be allocated in the East Wiltshire HMA above the 'minimum' requirement set out by the Core Strategy.

This approach has been advocated by other Inspectors in the examination of Site Allocations (Part 2) Plans in other Local Planning Authorities. For example, this occurred recently in North Somerset following the Examination of that authority's Part 2 Local Plan. In this instance the Inspector considered that the Part 2 Local Plan should allocate sufficient land, in order to meet a housing requirement which was equivalent to a 20 percent buffer above the 'minimum' requirement set out by the North Somerset Core Strategy.

At a more localised level it is notable that the Core Strategy housing requirement as apportioned to the Devizes Community Area (at Core Strategy Core Policy 12) has yet to be fully delivered, nor are there existing commitments sufficient to deliver the requirement by 2026 (the end of the Core Strategy Plan period). Despite its status in the settlement hierarchy, relatively little development has occurred at Market Lavington. Furthermore, although a Neighbourhood Plan is currently under preparation, this is progressing slowly and has yet to reach the Regulation 16 stage. In this respect, it is quite correct and reasonable for the Council to prioritise the supply of housing land through the allocation of sites at this settlement via the Housing Site Allocations DPD. However, there is clear scope to allocate additional land (over and above that currently proposed for allocation) at Market Lavington, which could further increase the supply of housing without engendering significantly greater harm.

Sustainable Location

In view the above, there is a necessity to identify additional land, capable of accommodating a greater quantum of housing development. Such additional housing should be identified in broad accordance with the Spatial Strategy and Delivery Strategy described at Core Policies 1 and 2 of the adopted Core Strategy.

Market Lavington is a 'Local Service Centre' which is defined, in Core Strategy Core Policy 1 as;

"Local Service Centres are defined as smaller towns and larger villages which serve a surrounding rural hinterland and possess a level of facilities and services that, together with improved local employment, provide the best opportunities outside the Market Towns for greater self-containment.

Local Service Centres will provide for modest levels of development in order to safeguard their role and to deliver affordable housing."

The spatial strategy therefore anticipates that a reasonable quantum of development will be delivered at settlements affiliated with Local Service Centre status. This is in order that such settlements can maintain their place in the settlement hierarchy, as denoted by their relative size and sustainability, and their functional role within the wider area (i.e. in terms of services or employment provision).

It is notable then that there has been little housing growth in Market Lavington during the Core Strategy Plan period to date. This is despite Market Lavington being the highest tier settlement in the Devizes Community Area Remainder (i.e. excluding the town of Devizes). Related to this there is also an acknowledgement, at paragraph 5.22 of the Submission Site Allocations DPD document, which suggests that additional housing development is needed, at Market Lavington, in order to "support local facilities and contribute to improved self-containment".

Accordingly, we consider that the proposal to allocate land at Market Lavington for additional housing is sound in-principle and accords with the sustainability and delivery strategies described within the Core Strategy. However, in view of the record of under-delivery within the East Wiltshire HMA, there is a case for allocating additional land (at sustainable locations), with the intention of aiming to over-deliver against the minimum Core Strategy requirement. Such a strategy allows for a Plan-led approach, but provides greater flexibility to overcome probable lapses in planning permissions and/or the delayed delivery of certain sites. In turn, this will assist the Council in maintaining a favourable supply position, whilst also boosting the delivery of new housing in sustainable locations.

Site Assessment

The proposed allocation of land at Underhill Nurseries (at policy H1.2) is supported in principle. The redevelopment of this site for housing would result in a logical extension to the settlement and would not result in any detrimental landscape or heritage impacts. However, it is considered that the allocation is incomplete, as it does not include all of the land occupied by the extant nursery use, vis-à-vis all of the land promoted for development.

The Devizes Community Area Topic Area Paper (June 2017) gives consideration to the proposed development of Underhill Nurseries for residential use. Table G.7 evaluates site SHLAA Ref. 2055, whilst Table F.6 considers site SHLAA Ref. 530 (Fiddington Hill). The Council's assessment of these sites is logical, to the extent that the perceived harm arising from the development of these sites would be limited and outweighed by the benefits of providing market and affordable housing. Equally, it is logical that the two sites should be brought forward together in order to allow for a suitable access to be formed. In this respect, we add also that there are multiple options for forming a suitable vehicular access. These include providing an enhanced access off Fiddington Hill, with improvements being made to the junction with Fiddington Clay / Stirling Road. Equally viable is the option for form a new vehicular access off Stirling Road (to the north west), with this passing through the plot of an existing dwelling.

However, the evaluation of the SHLAA site ref. 2055 (at Table G.7) leads to the discounting of the north eastern / eastern extent of the land promoted, and accordingly part of the site is screened out at the Stage 4 assessment. This would appear to be because those parts of the site (which are excluded) do not appear to contain any significant built form). For clarity, we provide below extracts to illustrate the extent of sites 530 and 2055 (as promoted through the SHLAA) in Figure 1 (See attached Appendix 2), as compared with the proposed allocation (shown in Figure 2 (See attached Appendix 3)).

We consider that the reduction in the size of the allocation is unjustified. In this respect we note that the extension of the site to the north east (to the rear to dwellings fronting Sterling Road) would not result in substantively different landscape or visual impacts, when compared to the allocation of a reduced site as currently envisaged in the draft Site Allocations DPD. In this respect we would highlight that the entirety of the land promoted at sites ref. 2055 and 530, comprises an area of relatively flat land at the base of a series of hills which extend to the south east and north east.

It is also the case that the extension of the proposed allocation would result in a logical capping-off of the north eastern edge of market Lavington, by bringing the extent of new built form up to the spur of existing development which already projects along the northern boundary of bridleway / PROW (which is denoted by the green line in Figure 2). If this were to occur, views of future development on the site would be seen in the context of the existing built extent of the village. This is to say that the development would not be viewed as a protrusion into the countryside and neither would such an expansion be perceived as diminishing the visual gap between Market Lavington and Easterton to the east.

We note that all of the land promoted for development (i.e. SHLAA sites ref. 2055 and 530) is associated with the existing nursery. Once the nursery use ceases (in favour of the proposed residential use) the balance of the land will not transfer to a productive agricultural use, but will rather remain disused. To leave a significant portion of the site derelict does not provide for an efficient use of land. Likewise, in view of the site's location and the presence of defensible boundaries (and taking account of the degree to which potential alternative sites at Market Lavington are constrained), it is likely that the remainder of site will eventually come forward for development. There is then a case for allocating the balance of the land in order to facilitate a coherent development, rather than a series of sporadic schemes.

It is important to emphasise that even if the full extent of sites ref. 2055 and 530 were allocated in the Site Allocations DPD, this does not mean that the entirety of the enlarged allocation would be developed. Rather, should a larger site be allocated, it will be possible to achieve a comprehensive scheme layout which tapers off (and provides an open space buffer) towards the rural edge and which includes additional

landscaping and green infrastructure. The overall effect will be to proportionately increase the quantum of market and affordable dwellings, which can be achieved through the allocation, whilst simultaneously providing much greater potential to achieve a sensitively configured design.

Summary and Proposed Amendments to the DPD

As outlined within the scope of this representation, it is considered that the proposed allocation of additional residential land at Market Lavington is consistent with the Core Strategy spatial strategy, and serves to reinforce the 'Local Service Centre' status the village has within the settlement hierarchy. To this extent, the strategy for the East Wiltshire HMA and the Devizes Community Area is considered logical. Similarly, the principle of developing the Underhill Nursery site represents a sound and reasonable approach. This is in view of its location and its relatively unconstrained nature, when compared to potential alternative sites at the settlement.

However, the preparation of this DPD gives the Council an opportunity to proactively plan for future requirements, and potentially safeguard against under-delivery in to the future, should the need for additional housing provision be required (i.e. beyond the minimum required by the current Core Strategy). The East Wiltshire HMA currently has a more favourable housing land supply position when compared to the North and West HMA. However, it is clear from the analysis provided in this representation that completions routinely fall below the annualised requirement for this HMA. There is therefore an opportunity to counter the prospect of future shortfalls in delivery (which will ultimately need to be addressed), by planning to deliver over and above the Core Strategy minimum requirement.

Taking this into account, and for the reasons explained, it is considered that the balance of the land promoted at Underhill Nursery should be allocated to allow for a comprehensive scheme to come forward. The concern then is that the approach currently envisaged in the DPD (i.e. the partial allocation of sites ref. 2055 and 530) shall serve to promote piecemeal development, with part of the site potentially remaining disused and vacant once the existing nursery use is superseded.

If the balance of the land should come forward for residential use, this would not result in materially different landscape or visual impact effects, and no greater harm would arise from this than from the development of the smaller areas of land currently proposed for allocation. Indeed, the opportunity to achieve a comprehensive design will provide greater opportunities for more meaningful green infrastructure provision, landscaping and open space.

Accordingly, we consider the following points and amendments should be considered in the preparation of the draft Site Allocations DPD:

The spatial strategy for the draft Plan should be re-considered to positively plan for the allocation of further sites and increase the size of proposed allocations, particularly where this does not result in substantively different levels of harm and where this facilitates additional benefits;

The full extent of the land associated with Underhill Nursery should be allocated for development, with this meaning that the proposed allocation H1.2 should be amended such that the entirety of SHLAA ref. sites 2055 and 530 can be brought forward as a part of an expanded and more coherent scheme. This scheme would include extensive areas of open space being provided at the north eastern extent of the enlarged site.

The settlement boundary should be amended to reflect the revisions to the boundary of the proposed allocation.

We trust that these comments are helpful, and we look forward to participating in the next stages of the Plan. In regard to the next stages of the Plan, we request to be notified of the following:

The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination; and

That the Inspector's Report (including any recommendations) into the examination of the Wiltshire Housing Site Allocations Plan has been published.

If you would like to discuss our comments or require any further clarification, please do not hesitate to contact us.

Attached files (Please see Objective)

4724068 / 4724069 / 4724070

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Further to our representations, we would wish to put forward our comments verbally, for the benefit of the Inspector.

Comment ID:	1952	Consultee Jacqueline Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131251	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses have suffered with severe flooding over the past 15 years, additional housing in this location would place an additional increased burden on the existing waterways and drains.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1953	Consultee Jacqueline Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131251		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My understanding is that Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities" but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation, so this aspect of the Plan is not consistent with the Strategy. Based on the above points it is clear that there is no substantiated strategic need for further housing allocations in Crudwell but also that it is absolutely appropriate that the Crudwell Neighbourhood Planning should determine what housing is required taking into consideration parishioners wishes and having examined the environmental and infrastructure constraints and options.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1954	Consultee Philip N Malcolm	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131274		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Comments on WCC's Housing Site Allocation Plan</p> <p>I wish to make representations regarding the Council's Draft Housing Site Allocations Plan dated June 2017 currently out for consultation. I am a resident of Crudwell, Malmesbury, Wilts and my representations focus on the allocation of the site at Ridgeway Farm, Crudwell : SHLAA Site 3223 (or 3233) for a further 40 houses.</p> <p>My representations are as follows:</p> <p>The allocation of this site is not necessary to meet any strategic need for housing, which is already met or exceeded by delivered, committed or planned developments in the North & West Wiltshire Housing Market Area (HMA) and the Malmesbury Community Area (MCA) [In the HMA the minimum housing requirement over the period 2006-2026 is 24740, less Completions 12603 and Developable commitments 11566, leaving 571 to be allocated as a minimum. The draft Plan allocates sites totalling 1195 houses which, even without consideration of 'windfalls', is more than twice the minimum number needed. With windfalls, the excess is 2710.</p> <p>In the MCA as a whole, there is no remaining requirement, as completions and developable commitments together exceed the requirement.]</p> <p>In accordance with the stated Core Policy 1, the Plan explains that, in Large Villages such as Crudwell, development should be '....limited to that needed to help meet the housing needs of settlements and improve... (employment) opportunities, services and facilities.' Again, at Clause 3.7: 'Development at Large and Small Villages should accommodate local needs.' And at Clause 4.4: 'Some new development, to meet local needs, may be appropriate at some of the designated Large Villages...' However, the Plan does not explain the nature of these needs local to Crudwell and how development of this site at the scale envisaged would contribute to satisfying them.</p> <p>It is claimed that, according to the 'housing register', a further 26 households are seeking affordable housing in and around Crudwell, as are some 48 households "in the local area". However, no evidence is provided to support these claims. I note the statement that a 2015 Rural Housing Needs Survey only identified a need for 8 affordable/shared ownership properties in Crudwell. I am aware that existing development already under construction at the same site will provide 4 such properties.</p> <p>The allocation is disproportionately large with regard to the existing community; 40 further houses would represent about 10% of the current housing stock in Crudwell parish, and about 15% increase for the village itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1955	Consultee Philip N Malcolm	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131274		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site is outside both the existing settlement boundary and the revised boundary proposed in the Plan. Clause 2.8 of the Plan states that ‘..development outside the settlement boundary is, with limited exceptions, not acceptable.’</p> <p>Previous proposals for development on this site were scaled down after legitimate infrastructure and environmental concerns were raised, and have not been alleviated. It is not appropriate now to greatly expand the envisaged scale of development, so exacerbating those concerns. There may be other potential development sites which are better. The best way to identify what developments can and should be put forward is through the Crudwell Neighbourhood Plan which is being developed. The Site Allocations Plan acknowledges that as a priority planning controls should pass to local communities.</p> <p>In conclusion, I do not think that the allocation of this site is justified and I believe that it should be withdrawn from the Site Allocations Plan pending development of Crudwell’s own Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1956	Consultee Mr Patrick Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131280	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>'The report concludes that the only plot of land in the Westbury area suitable for development is a 1.3ha (12,500m2) field immediately north of the B3098 as you enter Bratton from the Westbury side (site 321)'. The ONLY plot of land in the Westbury area????? Has the County Council completely missed the land on all sides of the town of Westbury, which essentially has become one large housing estate. The town of Westbury requires much needed investment into its infrastructure to support the developments currently being proposed/constructed now. Would the County Council not be best served to concentrate its efforts into providing the town of Westbury with improved facilities to support its current expansion?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1957	Consultee Mr Patrick Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>"The site is in an accessible and sustainable location served by existing highways infrastructure". The B3098 is not suitable for the increased traffic flow that would be created by this development. This 'B' road is an undulating and winding single carriageway, which isn't in particularly good condition or suitable for much of the traffic that uses it at present. Consider the increase of a potential 80+ vehicles on an almost daily basis (not unreasonable to assume two per household) and the effects that this would have on the local Bratton environment (air pollution and noise pollution alone).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1958	Consultee Mr Patrick Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131280	Person ID:	Do you consider the draft WHSAP is sound?	
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Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>“The site is capable of providing a significant number of much needed affordable dwellings for the village”. Where is the evidence for the requirement for these homes to be built in Bratton? Where is the evidence for the requirement for ‘affordable dwellings’?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1959	Consultee Mr Patrick Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The existing shop and pub serves the village well, but the doctors' surgery is notoriously difficult for current Bratton residents to get an appointment at, as it currently serves a great deal of Westbury residents. Has the Council considered what effect an additional 40 homes, each with 3 or 4 occupants, would have on this service, which can't accommodate the current demand.</p> <p>The village school has class sizes bordering on the maximum allowable levels, which would only be exasperated by more dwellings, many of which would house young families with primary school aged children.</p> <p>Are these few, overstretched village services that much of an attraction, that Bratton is the only village in the area that is suitable for this development???</p> <p>"In addition, the scale of development proposed would not significantly add to pressures on local infrastructure (NOT TRUE), services and facilities. Therefore, the overall sustainability benefits of developing this site are considered to be good".</p> <p>Considered by whom? The creators of the fundamentally flawed 'Feasibility Study'? Not an altogether convincing argument for this unwanted, ill-advised, unnecessary, environmentally detrimental development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1960	Consultee Mr Mark Joyce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126059		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 75 under “Achieving sustainable development” “Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.” There can be no justification to divert or close the existing rights of way BRAT24 and BRAT25 from their current historical alignment simply to facilitate excessive density of housing. Ensure any adopted policy protects the alignment of these PROWs.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1961	Consultee Mr Mark Joyce	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126059	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The map shown (Ordnance Survey extract) misrepresents site 321. Public Right of Way BRAT25, along the eastern edge of 321, is missing. (BRAT24 is shown) Illustrate the proposal correctly by showing PROW BRAT25. Both BRAT24 and BRAT25 to be shown.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1962	Consultee Huw Jessop	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131292		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With regard to the consultation on the settlement boundary for Warminster – Bishopstrow side, I would like to see the boundary moved to the Salisbury side of Bishopstrow Farm in line with Watery Lane.</p> <p>The reasons for this request is that it would be a natural boundary on the edge of Warminster and would then allow for reasonable infill development within this boundary.</p> <p>The demand for housing in Warminster over the coming years will be high due to:</p> <ul style="list-style-type: none"> Troops returning from Germany Employees at the 2 Sisters Chicken Plant in Sutton Veny The development of the new Longleat Safari Park attraction Organic Population Growth People relocating from London and other major cities, finding Warminster commutable. <p>This would require further land for mixed development housing to be available, and I should like to be considered for this.</p> <p>I have 6 acres available that could provide a mixed development of 30 houses.</p> <p>Previously I have had discussions concerning a smaller development of 12 houses and have submitted outline details for consideration. However no formal application has been made, and there is no registration on the SHLAA.</p> <p>As permission for additional accommodation has been granted for the Bishopstrow House Hotel , and the proposed development at Home Farm is looking positive, any development on my fields would be a natural progression.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1963	Consultee Huw Jessop	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131292		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With regard to the consultation on the settlement boundary for Warminster – Bishopstrow side, I would like to see the boundary moved to the Salisbury side of Bishopstrow Farm in line with Watery Lane.</p> <p>The reasons for this request is that it would be a natural boundary on the edge of Warminster and would then allow for reasonable infill development within this boundary.</p> <p>The demand for housing in Warminster over the coming years will be high due to:</p> <ul style="list-style-type: none"> Troops returning from Germany Employees at the 2 Sisters Chicken Plant in Sutton Veny The development of the new Longleat Safari Park attraction Organic Population Growth People relocating from London and other major cities, finding Warminster commutable. <p>This would require further land for mixed development housing to be available, and I should like to be considered for this.</p> <p>I have 6 acres available that could provide a mixed development of 30 houses.</p> <p>Previously I have had discussions concerning a smaller development of 12 houses and have submitted outline details for consideration. However no formal application has been made, and there is no registration on the SHLAA.</p> <p>As permission for additional accommodation has been granted for the Bishopstrow House Hotel , and the proposed development at Home Farm is looking positive, any development on my fields would be a natural progression.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1964	Consultee Mrs C Churchill Dinton Parish Council	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 390575	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.83			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Thank you for the opportunity to comment on the draft Wiltshire Site Allocations Plan, Dinton Parish Council resolved to make the following response at a meeting held on 19thSeptember 2017. The new settlement boundary cuts several of the residential gardens in Snow Hill in half.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1965	Consultee Mr Roger Williams	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1127014	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Access to the woods identified is irrelevant and a misnomer as people we have canvassed clearly prefer to maintain their existing recreational areas and not have them built on. This negates any environmental benefits stated in the development assessment by Atkins.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1966	Consultee Mr Roger Williams Person ID: 1127014	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Comments on consultation, processes, planning and the overall County Council approach, plus future process.</p> <p>We believe consultation approach by the County Council has been inadequate given the huge amount of information to be digested and commented on, especially given the amount of speculative developer applications in our area, the destructive impact of building on the proposed site at 3565 Southwick Court.</p> <p>As far as we know, no-one in Sandringham Road was aware of the informal consultations on settlement changes in respect to Southwick Court 3565, nor about the proposed development, until a couple of days before the cabinet meeting in June – proof if any was needed that the consultation publicity and engagement during the previous year was totally inadequate.</p> <p>Similarly as a group or individuals we have not seen the written recommendations from the consultation on the settlement boundaries or on the planning policy core strategy. What were these and have the key points raised by the limited number of residents that was engaged with been included in the plans? Were local Councillor views included in the amendments following consultation? What further consultation will be had following residents feedback as part of this process.</p> <p>The presentation maps and material at the public consultation at County Hall were not available to take away giving no time to understand the proposal properly. Whilst there are documents online some cannot be downloaded as they are locked out or wrongly formatted (even from direct links from the Council's own website about the Site Development Proposals was inaccessible last night 19th September 2017).</p> <p>We have been denied information by Wiltshire County Council (in writing) that we had requested under freedom of information about the feedback from the water authority about the situation of building on the flood plains at the Southwick Court 3565 site and the effect on our road and properties from additional risk of flooding.</p> <p>Instead we were provided with a long report with dozens of pages prepared by Atkins that has some seemingly strange or uninformed assertions about the supposed local benefits of development proposals and, in our view it appears biased in support of the proposals for Green Field sites such as Southwick Court 3565. We would like to have the opportunity to present our response to this report and ask for more time for consultation to do this, or to be allowed to present this at a later stage in the process.</p> <p>We understand that the Planning Inspectorate / Government makes the final decision but that the County Council will have a full meeting to consider the proposals and amendments proposed by the local councils and residents during the consultation period. Please advise of how we will be informed of the outputs and views presented by residents from the consultation before this meeting is held. Also, please advise the date of this meeting so we can attend.</p> <p>We would urge all Councillors to take account of the local residents' concerns and vote against the current proposals and instead adopt the positive alternatives put forward by Trowbridge Council (see Appendix 1).</p> <p>Baroness Scott said that Wiltshire Council will "treat every application ... in a fair and equitable way". We thank the Council Leader's affirmation of this and hope that the local residents, and the Councillors that represent us, are not only listened to, but their comments are acted upon and</p>			

	<p>included in the amendments to the plans to ensure the appropriate, sustainable and relevant development of Trowbridge as a county town that we can all be proud of.</p> <p>We would ask if there are changes recommended from the current consultation that there be a further consultation period to review these. This was a promise made by the County Council at the Cabinet meeting in June and we trust you will deliver on this promise.</p> <p>Then once an inspector is appointed to review the evidence and information we would request that we are allowed to attend and make oral presentations as part of the deliberation process.</p> <p>At the cabinet meeting it was stated that a certain “Appendix G” of the plans said that the proposed developments were “desirable and sustainable”. In our view, to build on Southwick 3565 is certainly not desirable nor sustainable for the reasons we have stated in this document. It is also the view of the local residents, friends of Southwick Fields, local Parish and Trowbridge Town Councillors, and we hope we have demonstrated the plethora of reasons sufficiently to ensure removal of this proposal from the plans.</p> <p>Baroness Scott stated at the cabinet Meeting on 20th June that at the full council meeting the proposals “have to be agreed by all 98 councillors”. We have listened back to the recording of the Cabinet Meeting and there are some other words added after a slight pause. We believe therefore that this may be misleading and that a unanimous vote may not be required, but instead a majority vote only is required. We would like clarification of this statement.</p> <p>Baroness Scott asserted variously and encouragingly to all of us present {Look at the evidence – provide the evidence – we will listen and make amendments – it will be for the Full Council to agree those amendments before we then pass the matter to the Inspectorate}. We trust this promise will be upheld and that amendments that have merit will be accepted, even if this serves to prolong the process.</p> <p>Furthermore, Councillors and speakers stated at the Cabinet meeting that they believe that the WCC Planning Policy is in disarray – that the policy and processes are in a “desolate state”, that the Core plan is unsustainable and what we are seeing is developer led policy. Cllr. Sturgis and Baroness Scott both refuted this, so we now call on them and all County Councillors to demonstrate that this is not the case and that you will take the advice and representations from local residents and other councillors and include the proposed amendments by TTC and ourselves in the plans.</p> <p>We also support the points raised by local resident Graham Hill (Balmoral Road) who has carried out a significant amount of research about the land at Southwick Court 3565 and has provided evidence against this development.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	1967	Consultee Ms Vivien Birch Person ID: 1127022	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	NUMBERS OF DWELLINGS We (lay people not professionally qualified and employed to do so) are expected to accept a statement of housing needs, the evidence available only if you have the considerable time to research the many hundreds or thousands of pages on the subject. Wiltshire Council asserts that Trowbridge needs site allocations for 800 dwellings, despite also telling us that North and West Wiltshire Housing Market Area as a whole requires a minimum of 571 dwellings, considerably less over a wider area. There is no clear explanation why Trowbridge Community Area is being expected to take such a large allocation. Those better qualified than I have made detailed comments already, strongly suggesting how Wiltshire Council have not got this right. The numbers of dwellings proposed for green field sites are further inflated, by the rejection of sites in built up areas, so not taking into account the number of dwellings which should be placed there. This is unacceptable – I had understood that (nationally) development of brownfield sites was to be given preference, before expanding into green field areas. This is made even less acceptable, as most of the allocations are in four large developments, no doubt more convenient and lower cost for developers, but much more intrusive on adjoining properties and communities.				
Attached files (Please see Objective)	4712576				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1968	Consultee Ms Vivien Birch Person ID: 1127022	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SIZE AND LOCATION The Trowbridge Community Area Topic Paper reminded us that Core Policy 29 of the Wiltshire Core Strategy says: “ <i>It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities.</i> ” [my italics] Despite this, three areas (Plan References H2.1, H2.2 and H2.6) are being proposed in the two parishes I know best, for development which severely compromise (even ignore) this policy. Ideally none of the three sites should be developed; if we are forced to accept some development, with modification, particularly reduction in size, parts of H2.1 Elm Grove Farm and H2.6 Southwick Court might be developed reasonably, although not acceptable to nearby residents: H2.1 Elm Grove Farm should not be developed at the southwestern end of the area proposed, any building well clear of the A363 and Woodmarsh, to maintain visual separation between Trowbridge and North Bradley; H2.2 A363/White Horse Park should not be developed at all, in order to maintain the open area between Trowbridge and North Bradley. N.B. the organisation which assessed the possible sites for development was misinformed, describing this area as part of Trowbridge, while it is part of North Bradley parish. H2.6 Southwick Court should be considerably reduced in size, a narrower band adjoining Trowbridge to give the historic Southwick Court buildings a wider space and stopping considerably short of Axe & Cleaver Lane. The intrusiveness of the solar farm (supposed to have limited life) along Axe & Cleaver Lane came as a nasty surprise to many; permanent, taller, housing would be a visual intrusion over a wider area, in the open space between Southwick and North Bradley and Trowbridge.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1969	Consultee Ms Vivien Birch	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127022	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONTROL OF DEVELOPMENT</p> <p>It was suggested to me at the Trowbridge consultation event, that there would be better planning control over allocated development areas than outside them. This is incomprehensible to those of us not versed in such matters. We would expect that if an area is not allocated for development, it would not be considered for development unless all the allocated areas, especially brownfield sites, had been taken up.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1970	Consultee Ms Vivien Birch	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127022	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>CONSULTATION</p> <p>Although Trowbridge Community Area has the largest suggested number of allocated dwellings, only one exhibition, on a working day during the school holidays, was held in Trowbridge. I know I am not alone in considering this inadequate.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1971	Consultee Mr Dean Berry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1127957		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>2) Permanent severe impairment to rural landscape</p> <p>3) The area is part of/close to Special Landscape Area, Conservation Area and SSSI – the development will have a severe negative and permanent impact on these.</p> <p>Other sites more suitable, with greater need and much less adverse impact, can and should be found</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1972	Consultee Mr Dean Berry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1127957		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	5.18 H2.14 Court Orchard/ Cassways, Bratton	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	4) High density housing in not in-character with the existing village Other sites more suitable, with greater need and much less adverse impact, can and should be found				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1973	Consultee Mr Dean Berry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1127957		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		5) The Sustainability Assessment has concluded that the site scores negatively on 9 out of 12 criteria Other sites more suitable, with greater need and much less adverse impact, can and should be found			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1974	Consultee Mr Dean Berry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1127957		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		6) The plan is opposed by Bratton Parish Council, who actually know the village and the proposed site well. Their views should be heeded rather than over-ridden or ignored Other sites more suitable, with greater need and much less adverse impact, can and should be found			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1975	Consultee Mr Dean Berry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1127957		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.18 H2.14 Court Orchard/ Cassways, Bratton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		7) The proposals for mitigation of environmental damage are not compelling or convincing Other sites more suitable, with greater need and much less adverse impact, can and should be found			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1976	Consultee Andrew and Margaret Foster	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131326	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We wish to express concern at the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell, and would appreciate it if you would consider seriously the following key points.</p> <p>Together with the 10 dwellings already being built on this site, this represents a near 20% increase in dwellings in the village of Crudwell (currently some 260 dwellings). The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so. however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell. A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell. Policy 1 of Wiltshire’s Core Strategy states that “Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.” but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy. Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met. Crudwell is not anti-development; it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan. Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development. In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners’ wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell in not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1977	Consultee Andrew and Margaret Foster	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131326	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1978	Consultee Andrew and Margaret Foster	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131326	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell Primary School is already greatly over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields. The school's ability to expand is not guaranteed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1979	Consultee Andrew and Margaret Foster	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131326	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1980	Consultee Mr John Gauld	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126300		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2 .Unless the once proposed southern by pass is built before the development begins, existing traffic problems, particularly at the roundabout South of New Bridge Road, are certain to be exacerbated by the huge number of additional vehicles from the proposed development.</p> <p>1. Building of the southern bypass before any development takes place.</p> <p>2. A substantial reduction in the proposed number of dwellings in the Harnham/Netherhampton Road area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1981	Consultee Mr John Gauld	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126300		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>4. The proposed sites are close to an area subject to flooding and the addition of substantially more "hard surface" is likely to worsen matters. In various parts of the UK disregard of this risk by planning authorities has resulted in misery for those deposited on badly sited developments.</p> <ol style="list-style-type: none"> 1. Building of the southern bypass before any development takes place. 2. A substantial reduction in the proposed number of dwellings in the Harnham/Netherhampton Road area. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1982	Consultee Mr John Gauld	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126300		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5. The views of the Cathedral from the Netherhampton road will be destroyed by the development to the north of the road,</p> <ol style="list-style-type: none"> 1. Building of the southern bypass before any development takes place. 2. A substantial reduction in the proposed number of dwellings in the Harnham/Netherhampton Road area. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1983	Consultee Jo Cadzow Person ID: 1131344	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster site allocations and settlement boundary		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to:</p> <ul style="list-style-type: none"> • Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and • Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026. <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1984	Consultee Jo Cadzow	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131344		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster site allocations and settlement boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1985	Consultee Mr Michael Felce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131395		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Durrington		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>It is inappropriate for Wiltshire to 'join' Amesbury with Durrington and to refer to Durrington as a market town by 'joining' the two areas. Durrington regards itself as separate from Amesbury and has always done so.</p> <p>Durrington is 'full up' and the proposals are inappropriate for various reasons (which I give later).</p> <p>The proposed revised settlement boundary for Durrington given by Wiltshire (as I understand the position) is inconsistent with Wiltshire's proposals for extra housing. (No explanation is given).</p> <p>Durrington will soon only have one medical centre. Such extra houses will not bring another medical centre and so the medical service which exists will become more stretched.</p> <p>As regards paragraph 5.150 of the Wiltshire document, Durrington is already substantially self-sufficient and does not need such expansion to give self-sufficiency.</p> <p>Expansion under the Wiltshire proposals does not lead to 'the viability of existing services'. It is likely to detract from the efficiency of such existing services, which are already viable.</p> <p>The Wiltshire document at the end of paragraph 5.150 refers to 'creating demand for an improved local offer'. This appallingly bad English does not assist in an appraisal of the proposal. What does this mean? If this expression is intended to mean that the proposed development would bring new businesses to Durrington, then I think such a suggestion is misconceived. Apart from anything else, there is no room for new businesses and in any event, great care should be taken in introducing business use into settled residential areas. At present, Durrington has a good selection of businesses serving its community. Such services include a chemist and a veterinary surgery.</p> <p>I consider that the Wiltshire document lacks an understanding of Durrington and the Wiltshire proposals are inappropriate and/ or misconceived.</p> <p>I consider that the Wiltshire proposals for Durrington are lacking justification and effectiveness.</p> <p>Durrington includes Larkhill where the residential buildings for the Army are being built. Durrington and Larkhill has the prospect of significant change as a result.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I am prepared to confirm my views			

Comment ID:	1986	Consultee Mr Michael Felce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131395		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed Clover Lane site is awkward in shape and is not conducive to attractive development. (A substantial portion of the site is outside the proposed revised settlement boundary, as I understand it: I attach a copy)</p> <p>Such residential development on this proposal site is likely to be 'cramped' and will generate traffic problems as a result of its layout. There will be a lack of amenity and some of the proposed houses will have an extra lack of amenity being close to the main road.</p>				
Attached files (Please see Objective)	4724658				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am prepared to confirm my views				

Comment ID:	1987	Consultee Mr Michael Felce	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131395		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.6 Larkhill Road, Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Larkhill Road site would create an inappropriate precedent for further development south of this road. The site is outside the settlement boundary. The site will generate traffic congestion on the Larkhill road. The site is not appropriate for high density housing which would look out of place amongst the surrounding area of modest density development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am prepared to confirm my views				

Comment ID:	1988	Consultee Mr Steven Baldock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446468	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to voice my opposition to the potential development of 840 plus houses in Harnham, It is ridiculous to build a huge development in an area without the infrastructure to cope with the extra traffic it will bring. There are only two ways into Harnham, by the Downton roundabout and from the mile wall from Wilton. Already, some days the traffic builds up past the Saxon Road traffic lights making it hard to leave Saxon Road!! due to cars stopping in the yellow hatches. Unless a southern ring road is built this is a non-starter!!</p> <p>Can you imagine an extra 1,000 plus cars on the road? There is only one small shop which means all these extra cars will have to leave by the same two roads to go shopping or to work, this will be absolute chaos.</p> <p>This fanciful idea needs cancelling now before money is wasted by committees etc. pushing paper.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1989	Consultee Mr Steven Baldock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446468	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to voice my opposition to the potential development of 840 plus houses in Harnham, An extra 100 houses are being proposed on the water meadow area which is prone to flooding, absolute madness from people that obviously know nothing of the area.</p> <p>This fanciful idea needs cancelling now before money is wasted by committees etc. pushing paper.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1990	Consultee Mr David Ferris	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131397	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I 'STRONGLY' object to the Netherampton New Housing Proposal.</p> <p>I live in Montague Road with two young children (twins aged 13yrs old). They cross the already very busy Netherampton Road, every school day, under adult supervision due to the volume of traffic and speed of traffic entering into a 30 MPH zone, to get their school bus in Upper Street. My wife and I have complained to Trafalgar School about the issues we have with the current situation with speed and volume of traffic and the new housing proposal will obviously increase this already dangerous road.</p> <p>The new housing proposal will bring added danger to our already unsafe local road</p> <p>Where we live we already have a new housing estate (Wellworthy Estate) and there are no road safety facilities for the added volume of cars and people</p> <p>Has anyone from the council observed the dangers that most families children face when crossing the already unsafe road</p> <p>I would like my views taken into consideration for the safety of my children and other children in my community</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1991	Consultee WJ Ferris	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131399	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>I'm writing as a resident of Harnham objecting to the proposal of new homes on the Netherhampton Road. Firstly the road is already too busy and not suitable for all the extra traffic and noise. At times the main road in and out of Harnham is grid locked and with more houses comes more cars which in turn would be chaos. Secondly my children cross this road daily on the way to school they sometimes have to wait up to 10 minutes (due to it being busy) let alone cars speeding way faster than the 30 speed limit they are suppose to be doing</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1992	Consultee Mr and Mrs Anne and Colin Liebenrood	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131400	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We would like to put some questions and make comments on the proposal for over 800 homes around Harnham. Who is likely to live in these houses, especially the 740 proposed for Netherhampton Road (areas s1027 & s1028)? The largest employer locally, presumably, is Salisbury District Hospital, so many of these homes would need to be for rent or sale at a truly affordable price. Is this the case?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1993	Consultee Mr and Mrs Anne and Colin Liebenrood	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131400	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We would like to put some questions and make comments on the proposal for over 800 homes around Harnham. Not everyone who may live in the proposed developments will necessarily work locally, necessitating travel elsewhere. Public transport in this area is minimal at present and local roads already extremely busy, especially at peak times. Unless plans to improve the road network are made before these sites are allocated, this should not be agreed. Such improvement should include safe routes for cyclists and pedestrians to local facilities and employment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1994	Consultee Mr and Mrs Anne and Colin Liebenrood	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131400	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We would like to put some questions and make comments on the proposal for over 800 homes around Harnham. How much thought is being given to the provision of other services, such as schools, shops and medical services? Too many developments lack these essential services within walking distance, encouraging more travel by car, with the consequent problems of congestion and pollution. We mentioned the hospital earlier. The only housing site proposal in which we can see positive benefit is the one to the south of Woodbury Rise (area 3272). As this is close to the hospital – and provided the mix of housing is suitable for all income brackets - a case could be made for this. In our view, the rest of the proposal is questionable as to its extent and viability.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1995	Consultee Mr James Craddock	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1131404		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027; S1028		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		See attached Appendix 1 (notes from Netherhampton Parish Council meeting). See also response from Netherhampton Parish Council (Consultee ID 1122902). Salisbury requires a ring road to cope with existing confluence of traffic, not alone more.			
Attached files (Please see Objective)		4772820			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I would like to know, in person, why the proposals are being considered whilst none of the issues raised have been considered before potentially granting permission.			

Comment ID:	1996	Consultee Mr and Mrs Mark and Lin Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131414	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Reference Site 3565 I am writing with relation to the above planning application and the proposed application for house building. I want to object in the strongest possible terms at this proposal due to the following reasons:- There are already brown field sites which clearly need to be utilised before using our beautiful countryside. We need to preserve our countryside. The land on the edge of this development was not called Boundary Walk without reason.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1997	Consultee Mr and Mrs Mark and Lin Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131414	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Reference Site 3565 I am writing with relation to the above planning application and the proposed application for house building. I want to object in the strongest possible terms at this proposal due to the following reasons:- The allotted land has already been subjected to limited flooding and severe drainage problems in the past. We need to preserve our countryside. The land on the edge of this development was not called Boundary Walk without reason.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1998	Consultee Mr and Mrs Mark and Lin Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131414	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Reference Site 3565 I am writing with relation to the above planning application and the proposed application for house building. I want to object in the strongest possible terms at this proposal due to the following reasons:- Both Balmoral Road and Sandringham Road are totally unsuitable for through traffic. Silver Street Lane, from which both these roads lead, is already used as a "rat run" linking Bradley Road to Frame Road. We need to preserve our countryside. The land on the edge of this development was not called Boundary Walk without reason.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	1999	Consultee Mr and Mrs Mark and Lin Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131414	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Reference Site 3565 I am writing with relation to the above planning application and the proposed application for house building. I want to object in the strongest possible terms at this proposal due to the following reasons:- The ransom strip along the hedgerow is an ancient parish boundary which should not be removed. We need to preserve our countryside. The land on the edge of this development was not called Boundary Walk without reason.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2000	Consultee Mr and Mrs Mark and Lin Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131414	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Reference Site 3565 I am writing with relation to the above planning application and the proposed application for house building. I want to object in the strongest possible terms at this proposal due to the following reasons:- The over allocation to build houses in Trowbridge with our Fire & Ambulance Service already under pressure, as are our Doctor's surgeries. We need to preserve our countryside. The land on the edge of this development was not called Boundary Walk without reason.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2001	Consultee Mr Stuart Chappell Postgraduate	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131447		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.68			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Inclusion of curtilage of properties with large gardens relates more closely to the built environment is sound and consistent with National Planning Policy Framework. These properties adjoin others forming a continuous linear development of housing within Mere. Properties on either side of Shaftesbury Road are linked together within the built form. Properties with large gardens should not be allocated for planning permission of new dwellings. The National Planning Policy Framework 2012 paragraph 48 mentions a windfall allowance 'should not include residential gardens'.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2002	Consultee Mr Richard Platts	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126750		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Cassways, Bratton		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		<p>4. The proposed development will significantly increase the potential for flooding downhill from the site (Rosenheim Rise, Court Lane, Lower Westbury Road) There is no indication how surface water will be properly drained from the site. Similarly there is no indication of the way in which sewage will be safely and effectively drained.</p> <p>Plans of the proposed development to show surface water and sewage drainage detail</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2003	Consultee Mr Richard Platts	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126750		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/Cassways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		2. No evidence of a proper study of wildlife and flora affected A proper study of environmental impacts			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2004	Consultee Tim Bullock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131422	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>I wish to register my concerns about the proposed allocation of an additional 40 houses to the village of Crudwell on the Ridgeway Farm site as detailed in the draft Wiltshire Site Allocations Plan.</p> <p>I have lived in Crudwell for five years and I can see that have been a number of new build housing projects in recent years, as a means of sustaining the viability of the village. With this sympathetic approach, the addition of small numbers of houses every few years, the character of the village has not been spoilt and the Conservation area has not been threatened.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2005	Consultee Tim Bullock	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131422		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In 2014, I objected to the Ridgeway Farm planning application for 29 nine houses when it was submitted to (and rejected by) Wiltshire Council and to my mind, the principle objections remain the same: The scale of the development - it was much larger than previous developments in the village. The proposed development is too large and outside of the designated red line settlement boundary for the village, as well as encroaching on viable farmland. I am not against the present development of 10 houses on the footprint of the old farm yard as it is certainly better than what was there before (the landowner having chosen to leave the buildings fall into disrepair and deteriorate), it made good use of an existing "brown field" site and is of a scale consistent with other recent developments in the village. However against this backdrop, I am shocked to see the draft allocation of an additional 40 houses on this site which was previously deemed unsuitable. As there is no immediate strategic need for any housing allocations at Crudwell, I would like to see the Neighbourhood Plan group given the opportunity to consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward. This site allocation if allowed to stand would, in my opinion, completely change the character of the village and undo many years sensible and sensitive development supported by the Parish Council and the planning teams at Wiltshire Council. I am not anti-development but I do favour sensible, incremental development. It is vital that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind – please re-consider Crudwell.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2006	Consultee Tim Bullock	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131422		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The development would increase the strain on the village drainage and sewage system which is already inadequate for the number of properties it attempts to support.</p> <p>Increased flooding risk to Tetbury Lane and the village as a whole. In the time we have lived in the village we have witnessed Tetbury Lane flooding on several occasions during periods of heavy rainfall. Water actually “fountains up” out of drains as they fail to cope with the volume of water. Walking our children along the lane to school we have been drenched by passing traffic as vehicles drive inconsiderately fast through puddles and surface road water. Any new development will add both to the surface water on areas of tarmac as well as the inadequate sewerage system which fails to cope in periods of heavy rain.</p> <p>Crudwell still has severe flooding problems which have not yet been completely addressed, it remains a major concern to people who live in properties around the Swillbrook which runs through the centre of the village. Many have experienced significant damage to their homes in recent years both through surface water and raw sewerage and I believe surface water from the proposed site would only make this situation worse. Many homes - including in The Butts cul de sac where I live, already need non-return valves to stay safe from sewerage flooding until the excess over capacity subsides.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2007	Consultee Tim Bullock	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131422		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Increased traffic in Tetbury Lane and the busy A429 causing further risk to pedestrians, bike and horse riders and vehicles. Tetbury lane is narrow and has stretches with no pavement, making walking to and from the facilities at the village hall to the rest of the village/school etc difficult and dangerous. Where are the residents of these 50 (10 + 40) houses going to work? Being in a village with poor public transport links, they will all have at least one car.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2008	Consultee Tim Bullock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131422	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I also do not think that the allocation is justified when you look at your own guidance or notes within the Site allocations Plan. This states that housing sites will only be allocated where there is a strategic priority to do so. From the data available, the Site Allocation Plan currently results in an oversupply of some 4,300 dwellings to 2026 when you take into account past completions with deliverable commitments and windfall sites; even excluding windfall sites, the oversupply is still 2,200 across the housing market area. More specifically, the Site Allocations Plan results in an oversupply of some 100 homes in the Malmesbury Community Area; Wiltshire Council also has a history of oversupply of dwellings - in eight of the last ten years, more homes have been built than planned and over that period the oversupply has been over 140% of target. On that basis there is no strategic need or justification to allocate new homes in Crudwell and the Draft Site Allocations Plan should not do so. I am also concerned that the site size / boundary of the Ridgeway Farm Development encompasses an area far greater than is required - even for 40 homes - so I question why that is the case and would like it reviewed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2009	Consultee Tim Bullock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131422	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The village school is full to capacity and would not be able to take additional pupils without significant investment in buildings and staff, never mind potentially worsening the parking issues at school pick up and drop off.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2010	Consultee Tim Bullock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131422	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Policy 1 of the Wiltshire Core Strategy notes that the "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", given that we have circa 250 homes in Crudwell, I do not see how an additional 40 homes on top of the 10 already being built - a staggering 20% increase overall - even falls within Wiltshire Councils own Core strategy.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2011	Consultee Mrs Clare King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131426	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is simply not the infrastructure in place to support an extra 850 houses in Harnham. The current road system will not cope with at least 850 extra cars as it cannot cope with the current traffic along the Netherhampton Road.</p> <p>The Harnham gyratory currently cannot cope with the volume of traffic and there are often long delays, especially during rush hours and the same for the Wilton Park Wall junction. With the extra houses, the situation will be made much worse.</p> <p>Everyone who needs a supermarket or large shop will have to drive down the Netherhampton and Harnham Road which will lead to long delays and too many cars on the road. Recent bridge works on the Newbridge Road led to massive traffic delays in Salisbury and this would be a regular occurrence.</p> <p>The site is not within walking distance of town, so cars will be used even if the bus service was increased.</p> <p>The current bus service is not well used by paying customers due to the high cost.</p> <p>There are not jobs for all these people in Salisbury, therefore further traffic will be on the roads as people travel for employment.</p> <p>A new doctor's surgery to be built.</p> <p>A new secondary school to be built.</p> <p>The proposed primary school to be up and running, before people move in.</p> <p>Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths.</p> <p>Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2012	Consultee Mrs Clare King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131426		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note that there is to be a primary school on the site, but there is not the spare capacity in the current infant and junior school to cope with these extra children until the school is fully opened. The local secondary schools St Edmunds, Trafalgar and Burgate School are all over subscribed and there is not a transport plan in place to take secondary school children to Sarum Academy, which is where they are expected to attend. A new doctors' surgery will be needed to cope with all the extra patients who would again have to drive down the A3004 Netherhampton Road to attend this, exacerbating the traffic problem.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2013	Consultee Mrs Clare King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131426		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note that there is to be a primary school on the site, but there is not the spare capacity in the current infant and junior school to cope with these extra children until the school is fully opened. The local secondary schools St Edmunds, Trafalgar and Burgate School are all over subscribed and there is not a transport plan in place to take secondary school children to Sarum Academy, which is where they are expected to attend. A new doctors' surgery will be needed to cope with all the extra patients who would again have to drive down the A3004 Netherhampton Road to attend this, exacerbating the traffic problem.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2014	Consultee Mrs Clare King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131426	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The houses are due to be built on an area which regularly floods. The water run off from the proposed site is not known and we fear that the run off from the new estate would worsen the flood risk in Harnham. The smaller site for 100 extra houses (site H3.3) is proposed to be built on a current flood plain and there is often standing water on this site.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2015	Consultee Mrs Clare King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131426		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The houses are due to be built on an area which regularly floods. The water run off from the proposed site is not known and we fear that the run off from the new estate would worsen the flood risk in Harnham. The smaller site for 100 extra houses (site H3.3) is proposed to be built on a current flood plain and there is often standing water on this site.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2016	Consultee Mr Chris King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131457	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>There is simply not the infrastructure in place to support an extra 850 houses in Harnham. The current road system will not cope with at least 850 extra cars as it cannot cope with the current traffic along the Netherhampton Road.</p> <p>The Harnham gyratory currently cannot cope with the volume of traffic and there are often long delays, especially during rush hours and the same for the Wilton Park Wall junction. With the extra houses, the situation will be made much worse.</p> <p>Everyone who needs a supermarket or large shop will have to drive down the Netherhampton and Harnham Road which will lead to long delays and too many cars on the road. Recent bridge works on the Newbridge Road led to massive traffic delays in Salisbury and this would be a regular occurrence.</p> <p>The site is not within walking distance of town, so cars will be used even if the bus service was increased. The current bus service is not well used by paying customers due to the high costs.</p> <p>There are not jobs for all these people in Salisbury, therefore further traffic will be on the roads as people travel for employment.</p> <p>A new doctor's surgery to be built.</p> <p>A new secondary school to be built.</p> <p>The proposed primary school to be up and running, before people move in.</p> <p>Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths.</p> <p>Further local employment</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I am a resident of Harnham and would like my views to be heard.			

Comment ID:	2017	Consultee Mr Chris King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131457		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note that there is to be a primary school on the site, but there is not the spare capacity in the current infant and junior school to cope with these extra children until the school is fully opened. The local secondary schools St Edmunds, Trafalgar and Burgate School are all over subscribed and there is not a transport plan in place to take secondary school children to Sarum Academy, which is where they are expected to attend. A new doctors' surgery will be needed to cope with all the extra patients who would again have to drive down the A3004 Netherhampton Road to attend this, exacerbating the traffic problem.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2018	Consultee Mr Chris King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131457	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note that there is to be a primary school on the site, but there is not the spare capacity in the current infant and junior school to cope with these extra children until the school is fully opened. The local secondary schools St Edmunds, Trafalgar and Burgate School are all over subscribed and there is not a transport plan in place to take secondary school children to Sarum Academy, which is where they are expected to attend. A new doctors' surgery will be needed to cope with all the extra patients who would again have to drive down the A3004 Netherhampton Road to attend this, exacerbating the traffic problem.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2019	Consultee Mr Chris King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131457	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The houses are due to be built on an area which regularly floods. The water run off from the proposed site is not known and we fear that the run off from the new estate would worsen the flood risk in Harnham. The smaller site for 100 extra houses (site H3.3) is proposed to be built on a current flood plain and there is often standing water on this site.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2020	Consultee Mr Chris King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131457	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The houses are due to be built on an area which regularly floods. The water run off from the proposed site is not known and we fear that the run off from the new estate would worsen the flood risk in Harnham. The smaller site for 100 extra houses (site H3.3) is proposed to be built on a current flood plain and there is often standing water on this site.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views to be heard.				

Comment ID:	2021	Consultee Cilla Palfreyman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131470	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>For many weeks I have been trying to figure out how to complain about the proposed development for 30 houses in Farrell's Field and don't know how. That in itself is indicative of a problem. I feel the whole notion has just been rushed through without any local advice sought on the development.</p> <p>YK is a wonderful tight-knit village community and we need to look out for the people who have been here for decades and see that their needs are met. Have they been consulted on this proposal? No. The majority of the villagers got to hear about it by word of mouth. That is all wrong. So I strongly object to your proposal on the grounds of lack of local consultation to ascertain housing needs, drainage problems, lack of access, and increased danger on an already overloaded road into YK.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2022	Consultee Cilla Palfreyman Person ID: 1131470	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Yes, we do need housing in YK, but not the sort you are proposing. There are people in the village who came here as families and now the children are flown the nest and they are widowed. So, because there are very few small bungalows, in several dwellings one person is taking up a family home. Also there are families who wish to upmarket but cannot afford the exorbitant prices of housing such as it is now in Farrell's Field. YK is a wonderful tight-knit village community and we need to look out for the people who have been here for decades and see that their needs are met. Have they been consulted on this proposal? No. The majority of the villagers got to hear about it by word of mouth. That is all wrong. So I strongly object to your proposal on the grounds of lack of local consultation to ascertain housing needs, drainage problems, lack of access, and increased danger on an already overloaded road into YK.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2023	Consultee Cilla Palfreyman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131470	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have only lived here 3 years but whenever there is talk of Farrell's Field there is concern over drainage. I don't feel you have given the problem enough or any consideration.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2024	Consultee Cilla Palfreyman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131470	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I live in Tiddleywink and as I don't drive I have to walk in the road down to the entrance of Farrell's Field as the grass verge is often impassable, particularly in winter. The road is highly dangerous as it is and all the lorries coming down will make it horrendous. You have huge access problems with what you are proposing which again haven't been thought through.</p> <p>So I strongly object to your proposal on the grounds of lack of local consultation to ascertain housing needs, drainage problems, lack of access, and increased danger on an already overloaded road into YK.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2025	Consultee Moore Allen and Innocent	Agent Mr Martin Miller Technical Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 393425	Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Hullavington and the Sustainability Appraisal		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Justified 1.16 The NPPF requires the plan to be “the most appropriate strategy when assessed against the alternatives”. 1.17 The plan process has not assessed reasonable alternatives. Sustainable sites across housing market areas have not been assessed as reasonable alternatives, as the area of search for sites has been artificially restricted. We consider that this is contrary to national policy. 1.18 It may at times be more sustainable to meet a housing requirement in a different settlement or community area, than where the need arises (which is the fundamental justification for the Wiltshire Core Strategy approach to the settlement hierarchy). The DPD evidence has not assessed whether this is the case, and therefore cannot be considered to be ‘the most appropriate strategy’ for Wiltshire, as required by paragraph 182 of the NPPF. The indicative requirements allowed for this flexibility, yet no flexibility and no resilience have been tolerated in the approach to the DPD. As a consequence, it is not justified.			
Attached files (Please see Objective)		4724834			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Moore Allen is the agent for landowners of land surrounding Hullavington that is capable of making a sustainable contribution towards Wiltshire's future housing supply, it is therefore important we are able to participate orally to expand on the comments we have made within this representation.			

Comment ID:	2026	Consultee Moore Allen and Innocent	Agent Mr Martin Miller Technical Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 393425	Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Hullavington and the Sustainability Appraisal		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Hullavington</p> <p>1.29 In specific regard to Hullavington, Moore Allen is the agent for a land owner on the outskirts of the former MOD base at Hullavington, just outside the settlement of Hullavington.</p> <p>1.30 Hullavington is a large village. Hullavington, accommodates a primary school, local shop and public house. There is a bus service that connects the village to the market town of Malmesbury and the principle settlement of Chippenham. There is also a primary school at Stanton St Quintin.</p> <p>1.31 There is a live planning application for the conversion of hangers at Hullavington Airfield to form a research and development facilities for Dyson. If this application is approved this will bring a significant element of employment into this area. The planning statement confirms this application responds to a short term needs of Dyson and the intention is to seek develop a master plan for the site to develop a global hub for Dyson's research and development work.</p> <p>1.32 As such the site provides future potential to accommodate growth associated with Dyson's plans for the former MOD airfield. In early 2017, Dyson revealed plans to develop a second campus at the former MOD base at Hullavington. Dyson has purchased the land and submitted an initial application for the conversion of some of the hangers to create employment floor space.</p> <p>1.33 We also understand that there is potential to reopen the railway station on the Swindon to Bristol railway line at Hullavington that would in the future provide a sustainable transport link.</p> <p>1.34 We note the site wasn't considered in the Sustainability appraisal but in broad terms the SA generally supports development in this location to the north of the village.</p> <p>1.35 To be sound, the council should have assessed the opportunity for these sites to contribute to sustainable development, and to enable housing to come forward alongside the employment proposed on Hullavington Airfield, to reduce communiting and to form sustainable development.</p>			
Attached files (Please see Objective)		4724834			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Moore Allen is the agent for landowners of land surrounding Hullavington that is capable of making a sustainable contribution towards Wiltshire's future housing supply, it is therefore important we are able to participate orally to expand on the comments we have made within this representation.			

Comment ID:	2027	Consultee Jo Hillier Person ID: 1131477	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 and H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is simply not the infrastructure in place to support an extra 850 houses in Harnham. The current road system will not cope with at least 850 extra cars as it cannot cope with the current traffic along the Netherhampton Road. The Harnham gyratory currently cannot cope with the volume of traffic and there are often long delays, especially during rush hours and the same for the Wilton Park Wall junction. With the extra houses, the situation will be made much worse.</p> <p>Everyone who needs a supermarket or large shop will have to drive down the Netherhampton and Harnham Road which will lead to long delays and too many cars on the road. Recent bridge works on the Newbridge Road led to massive traffic delays in Salisbury and this would be a regular occurrence.</p> <p>The site is not within walking distance of town, so cars will be used even if the bus service was increased. The current bus service is not well used by paying customers due to the high costs.</p> <p>There are not jobs for all these people in Salisbury, therefore further traffic will be on the roads as people travel for employment.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2028	Consultee Jo Hillier	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131477		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note that there is to be a primary school on the site, but there is not the spare capacity in the current infant and junior school to cope with these extra children until the school is fully opened. The local secondary schools St Edmunds, Trafalgar and Burgate School are all over subscribed and there is not a transport plan in place to take secondary school children to Sarum Academy, which is where they are expected to attend</p> <p>A new doctors' surgery will be needed to cope with all the extra patients who would again have to drive down the A3004 Netherhampton Road to attend this, exacerbating the traffic problem.</p> <p>A new doctor's surgery to be built.</p> <p>A new secondary school to be built.</p> <p>The proposed primary school to be up and running, before people move in.</p> <p>Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths.</p> <p>Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2029	Consultee Jo Hillier Person ID: 1131477	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note that there is to be a primary school on the site, but there is not the spare capacity in the current infant and junior school to cope with these extra children until the school is fully opened. The local secondary schools St Edmunds, Trafalgar and Burgate School are all over subscribed and there is not a transport plan in place to take secondary school children to Sarum Academy, which is where they are expected to attend A new doctors' surgery will be needed to cope with all the extra patients who would again have to drive down the A3004 Netherhampton Road to attend this, exacerbating the traffic problem.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2030	Consultee Jo Hillier	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131477		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The houses are due to be built on an area which regularly floods. The water run off from the proposed site is not known and we fear that the run off from the new estate would worsen the flood risk in Harnham. The smaller site for 100 extra houses (site H3.3) is proposed to be built on a current flood plain and there is often standing water on this site.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2031	Consultee Jo Hillier	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131477		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The houses are due to be built on an area which regularly floods. The water run off from the proposed site is not known and we fear that the run off from the new estate would worsen the flood risk in Harnham. The smaller site for 100 extra houses (site H3.3) is proposed to be built on a current flood plain and there is often standing water on this site.</p> <p>A new doctor's surgery to be built. A new secondary school to be built. The proposed primary school to be up and running, before people move in. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. Further local employment</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2032	Consultee Mr Charles S Goodall	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131488	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am a resident of Harnham and wish to lodge my objection to the proposal to build 640 new homes along the south side of Netherhampton Road and 100 houses on the north side.</p> <p>I object because current roads are at maximum capacity, traffic backs up from the Harnham Gyratory roundabout every morning causing noise and pollution.</p> <p>This is compounded when children are delivered and collected from the Harnham Primary School in Hollows Close.</p> <p>Traffic capacity from the Harnham Road into Salisbury is already at maximum capacity.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2033	Consultee Mr Charles S Goodall	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131488	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am a resident of Harnham and wish to lodge my objection to the proposal to build 640 new homes along the south side of Netherhampton Road and 100 houses on the north side.</p> <p>There is an outstanding lack of infrastructure, no new infrastructure is being proposed which will result in all residents having to drive along the Netherhampton/ Harnham Road to shop in Salisbury City Centre or in retail outlets on the Southampton Road</p> <p>This will all add to existing congestion.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2034	Consultee Mr Charles S Goodall	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131488	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am a resident of Harnham and wish to lodge my objection to the proposal to build 640 new homes along the south side of Netherhampton Road and 100 houses on the north side.</p> <p>The site on the north side of the Netherhampton Road is subject to flooding and this leads to environmental instability.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2035	Consultee A.E. Mercer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131504		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re Planning applications s1028 s1027 I wish to place my objections to the above proposed development on record. My grounds for objection are :- There is no plan for dealing with the increase in traffic that such developments would create. The Harnham gyratory is already operating beyond its design capacity and delays on the A0394 accessing the A354 and A 338 are often in excess of 10 minutes with the resulting increase in pollution levels and inconvenience. Over the 17 years that I have lived in Harnham traffic volumes have increased considerably and this plan offers no solution to managing the traffic increase.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2036	Consultee A.E. Mercer	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131504	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re Planning applications s1028 s1027 I wish to place my objections to the above proposed development on record. My grounds for objection are :- Both sites will cause an increase in rapid run off of water after rainfall with the potential for flooding. It is universally accepted that extreme weather events will become more common in the next few years and there appears to be no recognition of this in the plans submitted.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2037	Consultee Effie Gale-Sides Person ID: 1131512	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.39				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Although not housing, I was told recently that the consultation and site allocation also applied to places of employment. The boundary, should include the Atworth Business Park, (Atworth map J7) including the adjacent square field to the west of the Park (Atworth map I7 and J7 overlapping). This whole area was in 1921 the assembly plant of Mendip Motor and Engineering Works. In 1948 it became part of the Dowty Engineering Group, closing in 1991. After this it was the Atworth Business Park I think that the square field ((Atworth map I7 and J7 overlapping which has permission for the Leafield Marine extension) is not suitable for housing due to access being through the Business Park. However I think this field is suitable to provide more units for work opportunities in the future. Atworth has extremely little land outside the boundary that is not owned by Neston Estate, making the building of new future places for employment in the village more than difficult.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2038	Consultee Mr David Pearce Person ID: 1131509	Agent Mr Jon Gateley Associate Director Person ID: 1131505	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.2 para 5.20 Hilltop Way Salisbury	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED LETTER DATED 22/9/17 170922 Savills Representations on Hilltop Way Salisbury</p> <p>David Pearce, the landowner of the proposed allocation site at Hilltop Way, supports the proposed allocation for 10 units and can confirm his intention to deliver the site within a relatively short timescale. However, we have some proposed modifications to the wording of the relevant policy to improve its effectiveness (as set out in the attached letter). However we must draw attention to the outcome of the recent appeal (24 August 2017)¹, through which outline permission was granted on the site for:</p> <p>“the erection of 10 semi-detached bungalows, new footpath link and creation of public open space, incorporating 20 off-street parking spaces and 5x laybys to Hilltop Way.”</p> <p>This appeal decision affirms that WC are justified in identifying the site for allocation, with all environmental and technical issues having been adequately addressed. However, in light of the appeal decision the draft policy would now benefit from some minor amendments in wording, as suggested below.</p> <p>Proposed modifications to the draft DPD</p> <ol style="list-style-type: none"> 1. In the interest of clarity, reference should be made in paragraph 5.139, to the fact that outline planning permission for 10 units has been granted. 2. Again in the interest of clarity, we suggest the following minor amendment to the wording of paragraph 5.140: “The site is a narrow area of undeveloped rough grassland adjacent to existing residential development along Hilltop Way. Access to the site would, as established in the existing planning permission, be achieved via Hilltop Way ...” 3. The application and appeal have established that there is negligible (if any) intervisibility between the Old Sarum Conservation Area and the site. As such we would suggest the following modification: <p>5.142 There is potential for impacts on skyline views from Old Sarum Airfield Conservation Area and from Old Sarum Castle and these will need to be mitigated As identified in the existing planning permission, any potential landscape and townscape effects should be addressed through the appropriate location of new dwellings and a high quality design scheme, together with suitable landscaping and provision of open space.</p>				

	I trust that you will be able to take these reasonable suggestions directly on board within the next draft of the DPD; in the meantime I would be grateful for your acknowledgement of this representation.
Attached files (Please see Objective)	4725268
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2039	Consultee Mr Andrew Askins Person ID: 1127011	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Boundary hedgerows / tree lines • Lambrok Stream <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats.</p> <p>This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal. Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2040	Consultee Mr and Mrs Hawker	Agent Mr Daniel Drayton Associate	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131519	LPC (Trull) Ltd Person ID: 1131522	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A24. Christian Malford Revised Settlement Boundary	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed changes to the Christian Malford Settlement Boundary are Unsound because they are not 1) Positively Prepared; 2) Justified; 3) Effective; or 4) Consistent with National Policy. The reasons for this are set out below:- We wish to promote a parcel of land for inclusion within the Settlement Boundary at Main Road, Christian Malford, SN15 4AZ. We strongly object to the omission of this site from inclusion within the revised Settlement Boundary. Firstly, the site fully complies with the Council's Topic Paper 1 Settlement Boundary Review Methodology (June 2017) for inclusion. Secondly it is allocated for residential development in the emerging Christian Malford Neighbourhood Development Plan ("the CMNDP") (2015 – 2035) under Site Ref HS3 together with several other land parcels including Site Ref HS2, which for completeness, we consider should also be included within the village boundary. Conformity with Settlement Boundary Review Methodology The extent of the site is shown in the aerial photograph provided below. It is entirely developed by buildings and hardstanding and sits alongside the proposed new Settlement Boundary, with frontage onto the Main Road. The Settlement Boundary Review Methodology states that settlement boundaries should follow clearly defined physical features. As can be seen below, [attached] this site is clearly defined by the main road and elsewhere by the outer walls of the buildings that subsume it. We consider that there is no logical reason why this site would not be included within the revised Settlement Boundary. The buildings that occupy the site already define the built edge of the settlement. Conformity with the Neighbourhood Plan The site has been allocated in the emerging CMNDP along with a cluster of other housing sites in the immediate area, namely HS2, HS4, HS5 and HS6. These are all proposed to be included within a Revised Settlement Boundary in the CMNDP. Site HS3 is shown below (as extracted from the CMNDP) [attached]. The CMNDP describes the appearance of the site as an eyesore when entering the village from the west and that it can be visually improved upon by a residential redevelopment. The site is described as in an historically residential part of the village which the CMNDP is seeking to reinvigorate and integrate more into the core of the village. The omission of this land parcel and others from the village settlement boundary as proposed in the Housing Site Allocations Plan will run totally contrary to these objectives. In addition, and without prejudice to the individual merits of our client's land and buildings which clearly form part of the physical limits of the village, the adjoining land and buildings forming site HS2 (shown below) [attached] are also part of the CMNDP's suggested allocations and for completeness should be included within the Revised Settlement Boundary as well. Given this clear direction, the omission of these sites from the settlement boundary is a negative and retrograde step which is unsound and contrary to the Council's own settlement boundary methodology. The Draft Settlement Boundary Review Methodology states that sites will be included if they are allocated in the development plan for residential uses.</p>				

	<p>Paragraph 7.27 of the Methodology states that “Generally,whena neighbourhood plan submitted to the Council has reviewed a settlement boundary and proposes amendments, this Plan does not carry out a second re v ie w of the boundarie s ”. *</p> <p>(*emphasis added)</p> <p>In these circumstances, there are clearly no reasons why the revisions proposed to this Settlement Boundary in the Housing and Site Allocations Plan should be different to the CMNDP changes.</p> <p>Therefore we propose that in order to make the Plan sound the Settlement Boundary should be amended to include this site and HS2 as shown in the Settlement Map Extract shown below:- [attached]</p> <p>Conclusion</p> <p>This site lies in an historically residential part of the village. It is visually unattractive when entering the village from the west. The Neighbourhood Plan, which is now at an advanced stage, is seeking to regenerate this part of the village and this site and others have been identified for residential development as part of this objective. The Council's Settlement Boundary Methodology states that where settlement boundaries have been reviewed and amended as part of a Neighbourhood Plan the Housing and Site Allocations Plan will not interfere. On this basis, the Christian Malford Settlement Boundary should reflect the Neighbourhood Plan.</p>
Attached files (Please see Objective)	4725361 / 4725271
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We consider it is necessary to expand on the points raised in this representation with regard to the site's status in the Neighbourhood Plan.

Comment ID:	2041	Consultee Mr Henry Nurkowski Person ID: 703908	Agent Mr Daniel Drayton Associate LPC (Trull) Ltd Person ID: 1131522	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.49 Hilperton Revised Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We consider the proposed changes to the Hilperton Settlement Boundary are unsound because they are not 1) Positively Prepared; 2) Justified; 3) Effective; or 4) Consistent with National Policy (please find enclosed our completed Representation Form). The reasons for this objection are set out as follows.</p> <p>Our objection concerns the proposed changes to the Hilperton Settlement Boundary that relate to the Lion and Fiddle Inn, Trowbridge Road, Hilperton. The extent of this property is shown on the aerial photograph below. [attached]</p> <p>The existing settlement boundary (as shown by the thick blue line below) [attached] currently bisects the site. As can be seen, the existing boundary also bisects the rear gardens of several other properties in an illogical way without following any clearly defined physical features such as boundary walls, fences or hedgerows.</p> <p>The proposed changes to the Hilperton Settlement Boundary (as shown below by the thin red line) follows a more logical and realistic line, apart from the Lion and Fiddle. Here the boundary line 'spike's' inwards and back out again for no logical reason. In contrast to changes affecting adjacent properties, this proposed new line follows no clearly defined physical features on the ground within the site, as can be seen from the aerial photograph.</p> <p>Furthermore, there is nothing in the Topic Paper 1: Settlement Boundary Review Methodology to provide an explanation. The proposed change does not appear to follow any part of the methodology. Clearly, this site relates more closely to the built environment than it does to the open countryside.</p> <p>Not only is this alteration illogical it is also unsound as it is contrary to National Policy. Given that this property is in commercial use, and is therefore previously developed land, it is considered that this alteration is unsound because it fails to recognize the potential value of previously developed sites, which according to the NPPF are suitable locations for housing.</p> <p>A far more realistic and positive approach would be to amend the boundary as shown below. This would effectively continue the Settlement Boundary across the site in a straight line in a way that is more 'in line' with adjacent properties on either site.</p> <p>This approach would be more consistent with the settlement boundary methodology because it would follow the line of the neighboring property's rear boundary (to the west of the site), which is a hedgerow, thereby following a clearly defined physical feature.</p> <p>Furthermore, this approach would be consistent with National Policy because it would recognize the potential of the site as previously developed land within a built up area. [see attached map]</p> <p>In conclusion the existing settlement boundary in this part of Hilperton is currently illogically drawn and requires revision. A new settlement boundary methodology has been prepared which appears to have resulted in logical amendments in some areas. However, in respect of the Lion and Fiddle site, there is no logic to what is being proposed and the plan is unsound.</p> <p>This representation provides a far better solution – one which is consistent with the Council's methodology and national policy which recognizes the value and potential of previously developed sites.</p>			

Attached files (Please see Objective)	4725649 / 4725650
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We consider that it is necessary to discuss in further detail the settlement boundary as it relates to this site and understand from the Council why they have proposed this illogical change,

Comment ID:	2042	Consultee Mr Jeremy Cuff	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 701827	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in response to the latest proposals with regard to sites available for development and possible changes to settlement boundaries in Warminster, related to the development of Home Farm, which could occur should these changes be adopted.</p> <p>For a number of years, there has been deep, real and valid concern from large swathes of the local community about the irreparable effect on the local area should Home Farm be developed. It is therefore crucial that it (and any other unsuitable sites) are not given over to unwanted and poorly thought out developments simply because there is a willing seller of the land.</p> <p>As the same principles and concerns apply that have been argued for many years, I hereby object to the inclusion of Home Farm and other unsuitable sites to be included within the settlement boundary.</p> <p>As the same arguments apply, I show below my original letter of objection to the development of Home Farm from December 2016 (in blue on the following pages);</p> <p>I write in response to the receipt of a communication from Wiltshire Council giving notice of an outline planning application for a large-scale development of Home Farm on the outskirts of Warminster. I strongly believe that this proposed development to be both unnecessary and wholly unsuitable for the areas which it would affect, and hereby object to this application.</p> <p>Local Opposition</p> <p>Though not an argument in itself, there is and has been a very large and passionate opposition to the development of Home Farm with many well thought out, considered and justified arguments put forward by the local community. These views must be taken into account, as must the conclusions of the Wiltshire Council Core Strategy and the Warminster Neighbourhood Plan.</p> <p>The Overall Suitability</p> <p>It is widely accepted that there must be provision made for new housing. The question is about where is it most suitable for these developments to be allowed. The best solutions are to “in-fill” land that is already within the boundaries of the existing town such as “brownfield” sites and plots of land that are not being used or beneficial to the local residents.</p> <p>If, as is the case in Warminster where it is necessary to pursue both approaches in order to fulfil future housing needs, it is critical that any additional land designated must be the most suitable and least impacting, fully taking into account the impact on the environment, the historical value, the character of an area and able to provide an easy way to include infrastructure and access (such as to the Warminster bypass).</p> <p>The proposed development of Home Farm fails on all fronts as an area to be given over to housing.</p> <p>It is my strong belief that these arguments must be fully taken into account, resulting in the local authority strongly and clearly rejecting this unnecessary, unsuitable and unwanted development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	2043	Consultee Mr Jeremy Cuff Person ID: 701827	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wildlife of Home Farm Home Farm itself is host to a large number of species either all year round or seasonally, many of which are threatened by the kind of development that is proposed here. Should it go ahead, this development will almost certainly result in many of these species becoming a thing of the past in this area.</p> <p>Birds - Of species that are known to be threatened or in decline, the Woodcock, a secretive wading bird of wet woodlands and margins has been sighted. Two species of owl, the Barn and Tawny Owl are both residents of Home Farm and will be very vulnerable to any large-scale development due to the loss of feeding habitat and the inevitable human disturbance it will bring. Local residents have also enjoyed the summer visitations of the now threatened Cuckoo that has made Home Farm its destination of choice for the last 3 summers.</p> <p>The fields and barns of Home Farm have also been significant for House Martins, Swifts and Swallows. The farmhouse itself is used annually by nesting House Martins whereas the barns are used by nesting Swallows. One very interesting late summer phenomenon has been very large gatherings of Swallows and House Martins that have been seen feeding over the fields prior to migrating back to Africa, suggesting that the fields of Home Farm are significant for them.</p> <p>Other species of birds sighted include, but are not limited to the following; Bullfinch, Spotted Flycatcher, Goldfinch, Coal Tit, Marsh/Willow Tit, Treecreeper, Nuthatch, Green Woodpecker, Great Spotted Woodpecker, Goldcrest, Sparrowhawk, Kestrel, Raven, Jay, Song Thrush, Fieldfare, Red Wing, Blackcap, Redstart and Whitethroat.</p> <p>Reptiles & Amphibians – The secretive and threatened Grass Snake is known to be a resident of Home Farm and its margins. This species is especially sensitive to human disturbance and development. Common Newts and Frogs are also found in local water bodies and damp hedgerows.</p> <p>Mammals – Home Farm is regularly visited by Roe Deer, Foxes and Badgers. The area is also used by at least 2 species of Bats (and probably more), including what I believe are Horseshoe Bats that can be seen flying over the fields in the summer months</p> <p>Invertebrates – Insects are also a significant beneficiary of the Home Farm environs, with butterfly species (which are declining on a national scale) including Comma, Peacock, Speckled Wood, Dark Green Fritillary, Holly Blue, Red Admiral and Small Tortoiseshell. Moths species are numerous and include the Hummingbird Hawkmoth. Dragonflies and Damselflies are also resident.</p> <p>The Wildlife of the Immediate and Near Surrounds of Home Farm The immediate areas around Home Farm are very rich in flora and fauna, and contain national and even international rarities that are rightly subject to high levels of protection. The neighbouring habitats include mature hedgerows, chalk downland, wet woodlands, flood meadows and a chalk river (and tributary streams).</p>				

	<p>Any further pressure on these neighbouring habitats due to human encroachment and disturbance will have an adverse effect on the prospects of many of these species surviving into the future, and should not be underestimated. It is the duty of the local authority to ensure that these habitats and the species that are found within them are rigorously protected.</p> <p>There are colonies of rare, declining and important species of butterfly in the areas surrounding Home Farm – Marsh Fritillary and the Duke of Burgundy Fritillary are the most significant. Other species include Adonis Blue, Dark Green Fritillary, Small Copper, Grizzled Skipper, Dingy Skipper, Small Blue, Wall Brown, Green Hairstreak and Common Blue.</p> <p>In terms of birds in the near surrounds of Home Farm, there are Corn Bunting, Linnet, Kestrel, Snipe, Yellowhammer, Stonechat, Red Kite and Buzzard.</p> <p>Other species of interest and worthy of consideration are Common Lizard, Voles and Otters.</p> <p>The River Wylde</p> <p>The River Wylde is a chalk stream/river (an internationally rare habitat) and is therefore worthy of special consideration and protection. It is home to Otters, Voles, Owls, Grass Snakes, Trout, Grayling and possibly Crayfish – each of which is very sensitive to pollution and disturbance. The proposed Home Farm development is very close to the Wylde and is likely to cause polluted run-off and disturbance that will be very detrimental to this fragile habitat (see also “Flooding” below).</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2044	Consultee Mr Jeremy Cuff	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 701827	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The fields of Home Farm are prone to flooding and pooling during periods of significant rainfall. The likely result of any development of these fields is that this water will be directed "downhill" and straight into the River Wylde, thus degrading the water quality as raised in the point above. In recent years, the Wylde has flooded across the nearby "Bishopstrow Roundabout" and flooding regularly occurs at the entrance to Home Farm, where the lane joins the main road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2045	Consultee Mr Jeremy Cuff	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 701827	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Anyone living in the area of Home Farm and Warminster in general will be concerned about the effects of such a development on the local infrastructure.</p> <p>Local Public Services (Doctors, Schools, Dentists etc) – As Warminster will already receive a large number of new houses, this proposed development alone will create significant additional strain on local public services and is likely to be problematic to accommodate. Currently, the local schools are fully subscribed and it is difficult to obtain prompt doctors appointments. Therefore, the additional and unplanned addition of a further 135 homes will only add to that burden in an unsustainable and unhelpful way.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2046	Consultee Mr Jeremy Cuff	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 701827		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Traffic – Traffic is already a significant and growing problem in Warminster and will become increasingly so given the housing developments already agreed at other more suitable sites elsewhere in Warminster. The traffic generated by another 135 homes will create more strain on a road infrastructure and area that isn't conducive to that growth.</p> <p>Access – The proposed access to the proposed Home Farm development is unsuitable for the area in terms of road safety and the character of the area. It will effectively create a poorly placed access roads and an impression of "overload" to an area that isn't suited to it.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2047	Consultee Mr Jeremy Cuff	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 701827		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Council Core Strategy & the Warminster Neighbourhood Plan Warminster has been the subject of exhaustive studies in recent times by the local authorities in terms of housing and infrastructure needs, which has resulted in both the Wiltshire Council Core Strategy and the Warminster Neighbourhood Plan rejecting Home Farm as a suitable place for development. It would destroy the credibility of the process that has resulted those conclusions being reached if they are sidestepped, ignored and overturned simply due to the fact that there is a willing seller of the Home Farm land.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2048	Consultee Mr Jeremy Cuff	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 701827	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>An Area Of Historical Significance The area of Home Farm and its surrounds are part of rich history that includes the Iron Age hill fort of Battlesbury and nearby barrows. It is very likely that the inhabitants of these ancient lands travelled from their homes to the River Wylye across what is now Home Farm – who knows what might lie in the soils of these fields that will be lost forever underneath roads and concrete?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2049	Consultee Trustees of The D J Pearce 1998 Settlement	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131544	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury omission sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED REPORT: Savills The Yard Salisbury The Housing Site Allocations plan should include the allocation of the Yard site near Hampton Park, Salisbury as set out in the accompanying statement. The allocation of the Yard site is justified for a range of inter-related reasons: The location is acknowledged by WC as sustainable, due to its relationship with the existing built-up area; The yard and buildings relate to a former agricultural use which has now entirely ceased; In effect the site comprises previously-developed land and there will be visual enhancement; Its development would be consistent with planning decisions elsewhere; Allocation of the Yard site in the Plan.				
Attached files (Please see Objective)	4742944 / 4725356				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Yard site as an 'omission' site.				

Comment ID:	2050	Consultee Trustees of The D J Pearce 1998 Settlement	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131544	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury omission sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED REPORT Savills The Yard Salisbury The allocation of the Yard site is justified for a range of inter-related reasons. The Housing Site Allocations plan should include the allocation of the Yard site near Hampton Park, Salisbury as set out in the accompanying statement. There will be a reduction in the risk of crime and antisocial behaviour on the site. The building on the Yard site is located accessibly to built-up areas, but is not occupied, has relatively limited security infrastructure (in terms of lighting, fences etc) and also lacks passive surveillance from neighbours. As a result the site has attracted significant antisocial behaviour, suffering significant vandalism and graffiti with the police having been called on a number of occasions, including on 16 September 2017. The redevelopment of this site would entirely remove this risk, which is a material benefit.				
Attached files (Please see Objective)	4742944 / 4725356				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Yard site as an 'omission' site.				

Comment ID:	2051	Consultee Trustees of The D J Pearce 1998 Settlement	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131544	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury omission sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED REPORT: Savills The Yard Salisbury The Housing Site Allocations plan should include the allocation of the Yard site near Hampton Park, Salisbury as set out in the accompanying statement. The current application for 14 units shows that environmental and technical issues can be resolved. The current application on the site (16/06690/OUT) has shown that highway, drainage, ecological, and archaeological matters are capable of being overcome in a residential-only development. There are no objections from statutory consultees or internal officers of the council, with the only outstanding matter relating to the precise delivery mechanism for alternative reptile habitat, which is currently found on the site.				
Attached files (Please see Objective)	4742944 / 4725356				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Yard site as an 'omission' site.				

Comment ID:	2052	Consultee Trustees of The D J Pearce 1998 Settlement	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131544	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury omission sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT: Savills The Yard Salisbury</p> <p>The Housing Site Allocations plan should include the allocation of the Yard site near Hampton Park, Salisbury as set out in the accompanying statement.</p> <p>This document proposes that the Allocations Plan formally allocates, for up to 15 dwellings, a dilapidated former storage building and yard, immediately adjoining the built-up area of Hampton Park (hereinafter referred to as 'the Yard site'. It also proposes that as part of the relevant policy, provision is made for a large (11.4 hectare) area of meadow to be designated as an extension to Hampton Country Park, linked to residential development on the Yard site.</p> <p>It would be beneficial for the Yard site to be redeveloped soon, in parallel with the Country Park.</p> <p>The inclusion of the meadow as an extension to the Country Park is justified because it is in line with the Laverstock and Ford Parish Plan, and will contribute to public enjoyment of accessible countryside and the formal separation of Salisbury from Ford. A Development Plan policy to formally seek this will act as a catalyst to assist the landowner and Parish Council in driving forward preliminary discussions to achieve these ends.</p> <p>The landowner proposes that in parallel with allocating the Yard site for residential development, a further area of meadow land measuring 11.4 hectares should be delivered as an informal extension to the Hampton Country Park, with ownership being transferred to the Parish Council and the land being formalised as Access Land.</p> <p>This proposal has been discussed provisionally with the Parish Council on the basis of the following:</p> <ul style="list-style-type: none"> transferring (at nil value) the freehold ownership of the meadow land to Laverstock and Ford Parish Council (LFPC), or alternatively, another non-profit community body of its choosing. an in-perpetuity covenant to preclude any subsequent development on the land unrelated to agriculture, recreational or educational public access; the reserving of a small area of land close to Green Lane for ecological enhancement, as required for reptile translocation from the development of the Yard site. <p>Although no formal agreement has been reached at this stage, the landowner is continuing to maintain positive dialogue with the Parish Council and Ward Councillor aiming to achieve these objectives.</p> <p>Rationale for allocation of the Country Park extension</p> <p>The availability of the Meadow land for public recreation would contribute directly to two of the objectives of the Laverstock and Ford Parish Plan (2009), Part 3, under the heading 'protecting the environment', particularly relevant elements of which are:</p> <ul style="list-style-type: none"> 'Acquiring riverside land for public amenity use' 'Increase the number of footpaths and cycle routes as further development takes place' 'Where possible acquire any land that could be a public amenity and provide a green buffer' 				

	<p>As noted above, there is no process in train for Laverstock and Ford to bring forward a Neighbourhood Development Plan. As such, the Allocations Plan being taken forward by WC offers the only opportunity, for the foreseeable future to formalise into Development Plan policy, the landowner's intention to offer the land for open access / amenity.</p> <p>The presence of a Development Plan policy formally seeking the Country Park extension will significantly assist in enabling, and ensuring, the planning application and associated Section 106 agreement to deliver the transfer of the land.</p>
Attached files (Please see Objective)	4742944 / 4725356
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Yard site as an 'omission' site.</p>

Comment ID:	2053	Consultee Trustees of The D J Pearce 1998 Settlement	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131544	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury omission sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT: Savills The Yard Salisbury</p> <p>The Housing Site Allocations plan should include the allocation of the Yard site near Hampton Park, Salisbury as set out in the accompanying statement.</p> <p>Its development would be consistent with planning decisions elsewhere.</p> <p>Inclusion would be consistent with WC's methodology for settlement boundary reviews.</p> <p>Importantly, there is currently no intention in Laverstock and Ford to prepare a Neighbourhood Development Plan; therefore the Housing Site Allocations Plan is the only available policy mechanism to secure the intended aims, in tandem with the development of the Yard site.</p> <p>In line with the National Planning Policy Framework (NPPF), paragraphs 151-152, WC are obliged to prepare plans that contribute to the achievement of sustainable development, seeking opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.</p> <p>For the reasons set out the above proposals precisely align with these objectives and WC should therefore introduce the suggested policies.</p> <p>In addition, under the new methodology for calculating housing need, announced by the Secretary of State for Communities and Local Government in September 2017, Wiltshire will in due course be required to plan for a total of 2,227 dwellings per annum, reflecting an uplift of around 6% from the current position. This adds to the requirement for sustainable, accessible sites to be included at this stage.</p> <p>Its development would be consistent with planning decisions elsewhere.</p> <p>Inclusion would be consistent with WC's methodology for settlement boundary reviews.</p> <p>Importantly, there is currently no intention in Laverstock and Ford to prepare a Neighbourhood Development Plan; therefore the Housing Site Allocations Plan is the only available policy mechanism to secure the intended aims, in tandem with the development of the Yard site.</p> <p>In line with the National Planning Policy Framework (NPPF), paragraphs 151-152, WC are obliged to prepare plans that contribute to the achievement of sustainable development, seeking opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.</p> <p>For the reasons set out the above proposals precisely align with these objectives and WC should therefore introduce the suggested policies.</p> <p>In addition, under the new methodology for calculating housing need, announced by the Secretary of State for Communities and Local Government in September 2017, Wiltshire will in due course be required to plan for a total of 2,227 dwellings per annum, reflecting an uplift of around 6% from the current position. This adds to the requirement for sustainable, accessible sites to be included at this stage.</p>				
Attached files (Please see Objective)	4742944 / 4725356				
If your representation is seeking a change, do you consider it necessary to	In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Yard site as an 'omission' site.				

participate at the oral part of the examination?	
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Comment ID:	2054	Consultee Stephen Walters	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131542		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The reasons I believe make the proposal not sound are:- The development would be outside the village boundary - encroaching on a valuable green belt of land. The Bratton Parish Council seem to agree as it recently voted overwhelmingly to reject the proposals. How can Wiltshire Council override this decision?. Particularly as Planning permission has twice previously been rejected on the grounds that a housing estate in this location would represent "a substantial intrusion into the rural landscape".</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2055	Consultee Stephen Walters	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131542		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consistent with national policy				
Attached files (Please see Objective)	The reasons I believe make the proposal not sound are:- The development will be the most densely populated housing estate in Bratton - entirely not in keeping with the village style. It would have a terrible effect on the conservation area of the parish, impacting the views from higher ground and the White Horse.				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2056	Consultee Stephen Walters	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131542		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The reasons I believe make the proposal not sound are:- It would dramatically and adversely impact on local amenity/infrastructure. ALREADY IT IS NEARLY IMPOSSIBLE TO MAKE AN APPOINTMENT WITH A DOCTOR.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2057	Consultee Stephen Walters	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131542		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consistent with national policy				
Attached files (Please see Objective)	The reasons I believe make the proposal not sound are:- The local road system is already dangerously overloaded. Try cycling through the village on the B3098, a busy road that has seen 49 reported collisions (11 "serious") since 2000.				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2058	Consultee Stephen Walters	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131542	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The reasons I believe make the proposal not sound are:- As a supporter of Wiltshire Wildlife I must also point out the loss of habitat for the hedgehogs, slow worms and bats in the area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2059	Consultee Stephen Walters	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131542		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Effective	Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The reasons I believe make the proposal not sound are:- I am concerned about the drainage. Already the development site cannot cope with surface water and causes excess water to run down into the housing estate below it. With dwelling on the site there would be even less soakaway.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2060	Consultee Mr Mark Burnand	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705056		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2061	Consultee Mr Mark Burnand	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705056		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared</p> <p>Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2062	Consultee Mr Mark Burnand	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705056		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2063	Consultee Mr Mark Burnand	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 705056		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Effective</p> <p>The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets. For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2064	Consultee Mr Mark Burnand Person ID: 705056	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Warminster			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026. I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons: Consistent The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection. For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2065	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.1 - 3.4		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Pegasus on behalf of Hannick Homes & Development Ltd do not support the Plan with regard to the proposed revised settlement boundary at Hullavington. It is noted that the first Objective of the plan is to review the settlement boundaries. The following comments also relate to Section 6 Settlement Boundary Review.</p> <p>Paragraph 4.13 of the WCS allows for the review of the existing settlement boundaries through the Wiltshire Housing Site Allocations Plan. Paragraph 4.15 states that:</p> <p>'the sesettlement boundaries will also be reviewed as part of the Wiltshire Housing Site Allocations Plan as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly (emphasis added) reflect building that has happened since they were first established'. (my emphasis).</p> <p>In some cases these are clearly out of date as they do not reflect recent planning permissions. Topic Paper 1 Settlement Boundary Review Methodology states that as the boundaries were not altered in the Wiltshire Core Strategy that they relied on the district local plan settlement boundaries. Para 1.3 states that the "Council has undertaken a comprehensive review of the boundaries to ensure they are up- to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans."</p> <p>It is noted that in the three case studies referred to in Topic Paper 1 that;</p> <p>Winchester City included in the settlement boundary "Built/ commenced allocations/ planning permissions".</p> <p>Purbeck includes "Uses and buildings (including sites with unimplemented planning permission) that have a clear social or economic function."</p> <p>Kettering Borough Council includes "Existing commitments for built developments."</p> <p>It is noted that the Wiltshire Council draft settlement boundary methodology included "Both built and extant planning permissions for residential and employment uses for areas which are physically/ functionally related to the settlement." However, following consultation with the Parish and Town Councils who disagreed that the settlement boundary should include allocations, development proposals and unimplemented planning permissions as those who objected to the inclusion of sites with planning permission considered that many planning permissions never get built out and that the final built form may differ substantially from the original permission; the methodology was changed.</p> <p>Only those planning permissions that have commenced are included in the settlement boundary as they are considered to provide much greater certainty.</p>			

	<p>The Topic Paper concludes “Therefore, the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions. Nevertheless, it is recognised that settlement boundaries represent a snapshot in time. Unimplemented planning permissions subsequently built out can be included within a future review.” ‘Topic Paper 1 – Settlement Boundary Review Methodology’ states at Paragraph 7.23 that, “...the revised settlement boundary review methodology will include recreational or amenity spaces that relate more closely to the built environment, however it will exclude those which relate more closely to the open countryside. Nevertheless, it is recognised that these decisions will often be a matter of officer judgement that depends on the individual circumstance’.</p> <p>The revised settlement boundary for Hullavington does not include the school playing field, only the school buildings. This results in a peculiar settlement boundary form when the proposed allocation to the west of the village is taken into consideration. Moreover, this is not a space that provides informal recreation in the village but is a part of a key social facility in the village, ie: the primary school. It is noted that both the Purbeck and Kettering studies above include uses or buildings that had a clear social or economic function. The school playing field clearly has a social function providing space for external play and formal recreation at the primary school. It is unlikely that the land would be sought for development if it were included in the settlement boundary owing to its present use. Should any such application be made it would be subject to all the checks and controls undertaken by both Wiltshire Council and Sport England who seek to retain existing playing fields.</p> <p>The question is therefore what harm can result from the inclusion of the school playing fields within the settlement boundary such that a logical settlement boundary can be defined to the west of the settlement of Hullavington once the proposed housing allocation has been built. A plan showing the proposed settlement boundary in Topic Paper 1 and our client’s proposed revision to include the school playing fields is attached at Appendix 1. [see attached].</p> <p>In order for the plan to be found sound it is submitted that the methodology for settlement boundary revision should be amended to include the school playing field at Hullavington as the site provides for a social use and is unlikely to be found suitable for development as it is an active playing field, there is therefore no harm in including it in the settlement boundary for Hullavington village.</p>
<p>Attached files (Please see Objective)</p>	<p>4725869</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To be able to make representation to the Inspector on behalf of our client to the Inspector with regard to the matter of the proposed settlement boundary at Hullavington.</p>

Comment ID:	2066	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.1 - 3.4		Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Hannick Homes & Development Ltd do not support the Plan with regard to the proposed settlement boundary at Cricklade. It is noted that the first Objective of the plan is to review the settlement boundaries. The following comments also relate to Section 6 Settlement Boundary Review.</p> <p>Paragraph 4.13 of the WCS allows for the review of the existing settlement boundaries through the Wiltshire Housing Site Allocations Plan. Paragraph 4.15 states that:</p> <p>'these settlement boundaries will also be reviewed as part of the Wiltshire Housing Site Allocations Plan as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly (emphasis added) reflect building that has happened since they were first established'. (my emphasis).</p> <p>In some cases these are clearly out of date as they do not reflect recent planning permissions.</p> <p>Topic Paper 1 Settlement Boundary Review Methodology states that as the boundaries were not altered in the Wiltshire Core Strategy that they relied on the district local plan settlement boundaries. Para 1.3 states that the "Council has undertaken a comprehensive review of the boundaries to ensure they are upto-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans."</p> <p>It is noted that in the three case studies referred to in Topic Paper 1 that;</p> <ul style="list-style-type: none"> • Winchester City included in the settlement boundary "Built/ commenced allocations/ planning permissions". • Purbeck includes "Uses and buildings (including sites with unimplemented planning permission) that have a clear social or economic function." • Kettering Borough Council includes "Existing commitments for built developments." <p>It is noted that the Wiltshire Council draft settlement boundary methodology included "Both built and extant planning permissions for residential and employment uses for areas which are physically/ functionally related to the settlement." However, following consultation with the Parish and Town Councils who disagreed that the settlement boundary should include allocations, development proposals and unimplemented planning permissions as those who objected to the inclusion of sites with planning permission considered that many planning permissions never get built out and that the final built form may differ substantially from the original permission; the methodology was changed.</p> <p>Only those planning permissions that have commenced are included in the settlement boundary as they are considered to provide much greater certainty.</p> <p>The Topic Paper concludes "Therefore, the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions. Nevertheless, it is recognised that settlement boundaries represent a snapshot in time. Unimplemented planning permissions subsequently built out can be included within a future review."</p> <p>The revised settlement boundary proposed for Cricklade is not up to date as it does not reflect the recent planning permission granted on appeal in June 2016 after a previous Inspector's decision was quashed in the High Court on Land South of the Forty for 70 dwellings (13/07132),</p>				

	<p>(APP/Y3940/W/14/2223354). It should be noted that site preparation works have taken place at this site and a reserved matters application is currently with Wiltshire Council for determination (September 2017). It is submitted that work at the site could be undertaken imminently on approval of the reserved matters application and therefore the site should be included within the settlement boundary for Cricklade. Indeed, the Regulation 16 Cricklade Neighbourhood Plan includes this appeal site within the proposed settlement boundary for the Town acknowledging that the site provides part of the housing land supply for the Town for the remainder of the plan period up to 2026. The issue is what harm would there be to the settlement strategy of updating the settlement boundaries to reflect the recent planning permissions and proposed allocations, in addition to those under construction. These sites will, after all, be considered against the housing supply of the Wiltshire Core Strategy and are consistent with the settlement strategy, and at Cricklade have already benefited from initial site preparation works. In order for the plan to be found sound it is submitted that the methodology for settlement boundary revision should be amended to include extant planning permissions to enable sites that have previously been considered to be sustainable and suitable for development by either Wiltshire Council or the Planning Inspectorate to be included within a settlement boundary. In the case of Cricklade this would require the revised settlement boundary in the Wiltshire Housing Sites mended to harmonise with that published in the Cricklade Regulation 16 Neighbourhood Plan – see Appendix 1 attached. [see attached].</p>
Attached files (Please see Objective)	4726089
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To be able to male representation to the Inspector on behalf of our client to the Inspector with regard to the matter of the proposed settlement boundary at Cricklade.

Comment ID:	2067	Consultee Mr Simon Hunt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1117600		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my comments during the consultation period. My comments concern site 1021 Church Lane.</p> <p>Accessibility The proposed development plans for 45 houses on a site which will require a roundabout from the A361. The plan does not appear to acknowledge the concerns of the 2026 Trowbridge Traffic Model (PFA Consulting) regarding traffic flow into Trowbridge. The stretch of road under consideration has been a site of many accidents. There appears to be a suggestion that developing this site will enhance the town because residents will walk into the town and use public transport. However everyone who lives here will tell you that the majority of people drive into town, people do not walk because it is a long and not particularly pleasant walk.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2068	Consultee Mr Simon Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1117600	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my comments during the consultation period. My comments concern site 1021 Church Lane.</p> <p>Flooding The proposed site is part of the floodplain. This has reduced the proposed number of houses to 45 but any development will increase flooding. The environment agency considers land which is 100-200m either side of the Lambrok stream to be at high risk of flooding.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2069	Consultee Mr Simon Hunt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1117600	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to express my comments during the consultation period. My comments concern site 1021 Church Lane. Heritage sites The plan does not recognise the number of grade II listed houses which adjoin the site at Church Lane. The setting of these properties will need to be considered. The Church Lane site is an ancient water meadow (source: English Heritage) and has hedgerows which have to be protected. The current landowner has removed one section of hedge (which should not have happened) just to gain sufficient access to get a tractor onto the land. Housing development, a roundabout and access road will not be possible without removal of hedges. The site has become a site where deer rear their young. This site should not be developed when numerous brownfield sites closer to the town centre are being ignored. This goes against national policy, brownfield sites should be developed before greenfield sites are considered.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2070	Consultee Ms Brenda Mellor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131611		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Draft Wiltshire Plan SHLAA ref. 482.</p> <p>I wish to register opposition to the above proposed construction of up to 30 houses and commercial properties on this site, using the existing entrance to Farrells Field as the access to the 84039.</p> <p>This exit, which already has a 'pinch point' at the junction to the 84039 serves some 15 houses, some of which have 3 or even 4 cars per dwelling. These 30 or 40 cars already take up parking along the street in the development, as driveways are not built to accommodate these vehicles; causing difficulties in access for delivery vehicles etc. Goodness knows what would happen should there be a fire in the development. How would this narrow residential street cope with the vehicles from a further 30 properties?</p> <p>I hope these points will be taken into consideration when discussing this proposed development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2071	Consultee Mr Barrie Mellor	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131617	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to oppose the Draft Wiltshire Plan SH LAA reference 482 for the development of land at Farrells Field, Yatton Keynell. Whenever development in the village takes place, access to the B4039 is necessary and, in my opinion, the use of the Farrells Field entrance is not practical as the main thoroughfare.</p> <p>Currently there are 15 houses in Farrells Field and 39 cars parked in garages, drives, on the road and on occasions on the pavement. We are aware of the need for additional cars because the children of a number of families are unable to leave home because they cannot afford to buy their own property, so they have to have a car to enable them to go to work, college etc. and so we have houses with 3 or 4 cars per house. This has been demonstrated to my knowledge over the past 30 years (being one of those families). What will happen if another development of some 30 houses and commercial premises are expected and to enter and exit when it was thought necessary to install a 'Pinch Point' in the entrance so many years ago. There must be safe entrance for Fire and Rescue vehicles at all times and also for large vehicles such as the Council's refuse Lorries, oil tankers, for central heating and a whole range of other type deliveries.</p> <p>This has been demonstrated by the refuse collection in John Aubrey Close where the vehicle cannot turn around at the end of each cul-de-sac, and has to reverse back around the parked vehicles. The recent development at Blacksmith's Close also echo the parking problem.</p> <p>Whatever Planning Consents are sought, I am of the opinion that wider consideration is given to the changes in the lifestyle of Villagers. I am also aware of the desperate need to increase the numbers of all types of housing.</p> <p>Thank you for the opportunity to give you my thoughts.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2072	Consultee Ms Catriona Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131624		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to bring your attention to the objections I am raising with regard the proposed building of the 740 houses alongside the Netherhampton road, A3094, near Hamham. My objections are because of the following reasons:-</p> <p>1. Lack of assessment, analysis and preplanning with regard the infrastructure to support this proposed build and the impact on the surrounding environment. Mainly the increase in traffic this build will cause with entrance and exit only being onto the A3094. The A3094 is already an extremely busy traffic thoroughfare for cars, vans and large lorries. At peak periods, it is not unusual to have vehicles backlogging from the junction of the A3094 onto the Harnham Gyratory to as far back as Parsonage Green where Harnham Road becomes Netherhampton Road. It is not unusual to also have a backlog of traffic at the junction of the A3094 with the A36, with cars experiencing delays as far back as the junction to the road leading to the Race Course and the back entrance to Wilton House. The building of the proposed school will also increase the amount of traffic leading to and from the site. The emergency services frequently use the A3094 to get to accidents in the city and on the A303, this will be impeded with the increase in traffic. There is very little signage within the city boundary on the A3094, to indicate there is a 30mph speed limit and frequently vehicles speed along the road until they are halted by the backlog. Several accidents have occurred on the A3094, including a fatality, as well as damage to private property. The front garden wall of our property has previously been destroyed when a van and trailer drove into it. Unlimited parking also compounds the situation with reduced spacing for vehicles to pass each other, resulting in damaged cars. It is impossible to widen the road within the city boundary. Has discussion taken place with the bus companies to support the transport needs as buses to the city centre do not extend to there and if there are no plans to extend will cause additional cars on the road as inhabitants go about their everyday business. The plans to build a bypass to support traffic passing along the A36 and A3094 through the city needs to be resurrected before proceeding with any more building. Particularly the Harnham Gyratory will not be able to take the additional traffic leading onto it if this building of 7 40 houses goes ahead.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2073	Consultee Ms Catriona Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131624		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to bring your attention to the objections I am raising with regard the proposed building of the 740 houses alongside the Netherhampton road, A3094, near Hamham. My objections are because of the following reasons:- 2. To meet the need for affordable houses it is widely reported that 68% of the build needs to be affordable housing. I object to the fact that the large building corporations that could only afford to build this size of plot will make a vast profit out of the disruption it will cause to people already living in the area and passing through the city. Large building companies such as Barretts, Persimmon and Taylor Wimpey have made two million plus pounds profit since 2010. They appear to only agree to 29% of houses being affordable housing, and less if they can negotiate when they have to agree to other properties such as a school. They make their profit from the rest of the houses being 4 or 5 bedroomed houses. There is not a need for this type of houses in Netherhampton, as many are already being built in other parts of the city and Wilton.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2074	Consultee Ms Alison Baldock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131630	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I live in Harnham and I am concerned about the possible development of a further 840 houses. There is already a high volume of traffic on the Harnham Road, which runs from the Downton roundabout all the way through to Wilton. The new development will add another 1,000 cars to this road. Because of the river, it is not feasible to widen or add extra roads to the existing one.</p> <p>The development is a non-starter.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2075	Consultee Ms Alison Baldock	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131630	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I live in Harnham and I am concerned about the possible development of a further 840 houses. The area around is also prone to flooding because of the water meadows and river. The development is a non-starter.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2076	Consultee Charlotte Burnand	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1131654		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2077	Consultee Charlotte Burnand	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131654		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared</p> <p>Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2078	Consultee Charlotte Burnand	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131654		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2079	Consultee Charlotte Burnand	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131654		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Effective</p> <p>The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets. For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2080	Consultee Charlotte Burnand Person ID: 1131654	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to:</p> <p>Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and</p> <p>Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Consistent</p> <p>The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2081	Consultee David A Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131660	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As an 82 year old man born and bred in Salisbury I wish to register a protest rewgarding the continual development in and around Salisbury. I have yet to see any sign of any infrastructure in the form of roads etc to accommodate this development? Traffic is so bad that unless I pick the time I can never visit the eastern side of the city. That is not a nice thought. No developer to my knowledge has offered up plans to solve the chaotic traffic situation in Salisbury. All they want to do is to build more and more houses to increase their profits. Heavy lorries are causing atmosheric polution which is at a high level on some roads. For the sake of citizens of Salisbury, I hope whatever decision is arrived at I hope you will bear in mind my points of view.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2082	Consultee Unknown Bloor Homes	Agent Mr Andrew Ross Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 556573	Turley Associates Person ID: 556956	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.45 Cricklade Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Based on its favourable assessment [see attached], the draft Site Allocations DPD should be identified as an option for residential development and the settlement boundary of Cricklade should be amended accordingly.				
Attached files (Please see Objective)	4726898				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2083	Consultee Unknown Bloor Homes	Agent Mr Andrew Ross Director	Do you consider the draft WHSAP is legally compliant?																																																	
		Person ID: 556573	Turley Associates Person ID: 556956	Do you consider the draft WHSAP is sound?																																																	
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Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy																																																			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Five Year Supply and Housing Provision</p> <p>We do not consider that Wiltshire Council can currently demonstrate a five year housing land supply, despite the Council's claimed supply in the North and West HMA of 6.62 years (Topic Paper 3). We note the conclusions of Inspectors at recent appeals in the HMA namely at Forest Farm, Chippenham (ref: 3150514), the Grange, Hilperton (ref: 3167012) and Land to the south east of Wouth View, Lyneham (ref: 31625812) which also conclude that there is currently a five year supply in the North and West HMA. Despite this, the position in the North and West HMA is quite clearly marginal, with the Inspector for example in the Hilperton appeal decision stating that there was a surplus of only 59 dwellings, and the Inspector in the Lyneham decision stating there was a supply of just 5.11 or 5.05 year supply.</p> <p>For the North and West Wiltshire HMA, currently a 5% buffer is applied to the housing land supply to ensure choice and competition in the market for land. Notwithstanding this, there is a strong case that a 20% buffer is also applicable for the North and West HMA given the delivery record set out below demonstrating persistent under delivery in 8 of the previous 11 monitoring years (since the beginning of the plan period) and 8 of the past 9 years.</p> <table border="1"> <thead> <tr> <th></th> <th>06/07</th> <th>07/08</th> <th>08/09</th> <th>09/10</th> <th>10/11</th> <th>11/12</th> <th>12/13</th> <th>13/14</th> <th>14/15</th> <th>15/16</th> <th>16/17</th> </tr> </thead> <tbody> <tr> <td>Completions</td> <td>1,365</td> <td>1,609</td> <td>999</td> <td>926</td> <td>1,129</td> <td>1,028</td> <td>1,039</td> <td>1,517</td> <td>1,139</td> <td>915</td> <td>847</td> </tr> <tr> <td>Requirements</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> <td>1,237</td> </tr> <tr> <td>Performance</td> <td>+128</td> <td>+372</td> <td>-238</td> <td>-311</td> <td>-108</td> <td>-209</td> <td>-198</td> <td>+280</td> <td>-98</td> <td>-322</td> <td>-390</td> </tr> </tbody> </table> <p>Based on the findings of the Inspectors at the Hilperton and Lyneham Appeal Decisions, Wiltshire Council would be unable to demonstrate a five year supply in the North and West HMA with the application of a 20% buffer, and given the above delivery record, the situation can therefore be fairly described as precarious. It is also acknowledged at paragraph 2.14 of the DPD itself that:</p> <p>"Fluctuation can occur in the delivery of housing but a central objective of the Plan, ensuring surety of supply, s to sustain a 'five year housing land supply' over the remainder of the plan period for each of these HMAs."</p> <p>Furthermore, the current approach of the DPD wrongly assumes 100% delivery of existing commitments to deliver the 'residual' housing requirement, without taking into account any lapse of those planning permissions, and not ensuring a suitable buffer of sites above that residual requirement.</p> <p>Given the above, and in accordance with the NPPF, we consider that additional sites should be identified over and above the 'residual' housing requirement in the North and West HMA to provide a realistic prospect of achieving the planning supply and ensure choice and competition in the market for land. This approach will ensure that the plans objective to sustain a five year supply of land across the plan period is met.</p>						06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17	Completions	1,365	1,609	999	926	1,129	1,028	1,039	1,517	1,139	915	847	Requirements	1,237	1,237	1,237	1,237	1,237	1,237	1,237	1,237	1,237	1,237	1,237	Performance	+128	+372	-238	-311	-108	-209	-198	+280	-98	-322	-390
	06/07	07/08	08/09	09/10	10/11	11/12	12/13	13/14	14/15	15/16	16/17																																										
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	<p>Crucially, there would be no planning harm from this approach, as the housing requirement in Wiltshire is a minimum, not a maximum, and cannot therefore be considered a cap to sustainable development.</p> <p>We suggest that to plan positively to ensure future development needs are met, additional sites should be allocated in the North and West HMA equivalent to a 20% buffer above the 'minimum' requirement set out by the Core Strategy. This approach has been advocated by other Inspectors in the examination of Site Allocations Plan (Part 2) plans in other Local Planning Authorities where there has been record of persistent under delivery, for example recently in North Somerset.</p> <p>Suggested change:</p> <p>The content of the draft Plan should be re-considered to positively plan for the allocation of further sites given the North and West HMA's marginal five year housing land supply position, justification for a 20% buffer to ensure choice and competition in the market for land, and Wiltshire's housing requirements being a minimum;</p>
<p>Attached files (Please see Objective)</p>	<p>4726898</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2084	Consultee Unknown Bloor Homes Person ID: 556573	Agent Mr Andrew Ross Director Turley Associates Person ID: 556956	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Housing Delivery Strategy				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Swindon</p> <p>A joint Wiltshire and Swindon Strategic Housing Market Assessment (SHMA) and Functional Economic Market Area Assessment (FEMAA) are being produced jointly by Wiltshire Council and Swindon Borough Council, these reports will reflect the most up to date evidence on functional housing market areas and will form the evidence for Local Plan reviews for both Local Planning Authorities.</p> <p>The latest reported position on the SHMA identifies that Wiltshire and Swindon comprise four constituent functional housing market areas centred respectively on Chippenham, Salisbury, Swindon and Trowbridge, the SHMA also considers the Objectively Assessed Need (OAN) for Wiltshire and Swindon to be higher than currently planned for.</p> <p>Also of note is the joint FEMAA, which reportedly identifies three 'best fit' functional economic market areas (Swindon/M4 corridor, A350/West Wiltshire towns and Salisbury/Amesbury/A36) that broadly correspond with the three economic zones of the Wiltshire and Swindon Strategic Economic Plan.</p> <p>Cricklade, despite being located under the jurisdiction of Wiltshire Council, and within the North and West HMA has strong connections with Swindon. Swindon is an important nearby town and an employment and service centre for Cricklade, with Cricklade being located 9 miles away from the town centre, and just 5 miles from the settlement limits at the north west of the town with development at Tadpole Farm. Due to its location, in both cases, we consider it reasonable to assume that Cricklade will be considered within the 'Swindon HMA' in the SHMA, and 'Swindon/M4 corridor' in the FEMAA.</p> <p>Also of relevance to this representation therefore is the status of the five year housing land supply in the adjoining Borough of Swindon, of note considering the emerging joint Wiltshire and Swindon SHMA.</p> <p>The five year housing land supply position in Swindon (within the same Housing Market Area as Cricklade) is distressingly low, with the Borough being able to demonstrate less than 2.5 years supply. This position is articulated through a recent called-in appeal decision determined by the Secretary of State at the land to the east of Marlborough Road, Wroughton (ref: 3147902), however we are of the strong view that the level of supply in Swindon is in even lower than reported. This acute shortfall is undoubtedly having significant knock on effects to affordability in the functional Swindon housing market area. We note also that it is agreed that for Swindon a greater 20% buffer is applicable due to their record of persistent under delivery supply to ensure choice and competition in the market for land.</p> <p>Due consideration should be given to this emerging planning policy context, it being clear that Cricklade is a logical and sustainable location to meet part of the burgeoning unmet needs of Swindon, given its strong, practical connections and the direction of travel of the emerging joint Wiltshire/Swindon SHMA and FEMAA.</p> <p>Suggested change: Further allocations in the North and West HMA should be located at Cricklade given it is a sustainable location for development (as confirmed in its status as a Local Service Centre), as it is well placed to accommodate development as part of the wider Swindon HMA;</p>				

Attached files (Please see Objective)	4726898
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2085	Consultee Unknown Bloor Homes Person ID: 556573	Agent Mr Andrew Ross Director Turley Associates Person ID: 556956	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	North and West HMA				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Sustainable Location and Site Assessment</p> <p>Taking all of the above into account, it is acknowledged in the Wiltshire Core Strategy, and accordingly within the draft DPD that Local Services Centres, such as Cricklade, can accommodate “modest levels of development”. However, currently the DPD does not allocate any further development at Cricklade.</p> <p>For the Royal Wootton Bassett and Cricklade remaining community area i.e. outside of Royal Wootton Bassett itself, we acknowledge that the residual requirement set out by the Core Strategy, when taking into account commitments, has been fulfilled. However, within that remaining area, Cricklade is identified as a Local Service Centre with the next biggest settlements being Lyneham and Purton. As such, it is reasonable to assume that, given the settlement hierarchy, any further housing allocations to bolster this housing provision (whilst also bearing in mind our points above) should be directed to Cricklade.</p> <p>Despite choosing not to allocate sites at Cricklade due to its position in the settlement hierarchy, the DPD is inconsistent in its approach by allocating further sites in the East Wiltshire HMA at Market Lavington, a settlement, like Cricklade, identified as a Local Service Centre.</p> <p>Within the site selection methodology for the draft Plan (Topic Paper 1), the land at Horsey Down, Cricklade has not been assessed due to its location in a settlement not considered by the Council to be a location where land supply needs to be supplemented.</p> <p>Despite this, we consider the land at Horsey Down, Cricklade to be a wholly sustainable location for residential development with extremely limited site constraints (see Constraints Plan enclosed at Appendix 2), and well located to local facilities and services (see Facilities Plan enclosed at Appendix 3). [see attached]</p> <p>The site selection methodology assessed sites against a set of sustainability objectives, giving each site a score against each objective based on a scale of effects from major positive to major adverse. When considered through the same methodology that the land at Horsey Down would score well overall against the sustainability objectives, its sustainability credentials as a location for residential development being clear. Notably however we consider that comparatively, the site would score as well as any other Greenfield site considered in the draft Plan.</p> <p>Summary and Proposed Amendments to the DPD</p> <p>The preparation of this DPD gives the Council an opportunity to pro-actively plan for future requirements, and potentially safeguard against under delivery in to the future, should the need for additional housing provision be required (beyond the minimum required by the current Core Strategy).</p> <p>As outlined in this representation, the land at Horsey Down, Cricklade for sustainable residential development.</p> <p>Accordingly, we consider the following points and amendments should be considered in the preparation of the draft Site Allocations DPD: Bloor Homes’ site as the land at Horsey Down should be assessed and considered in the emerging Site Allocations DPD as an option for sustainable residential development to support the delivery of homes within Wiltshire;</p>				

	<p>We trust that these comments are helpful, and we look forward to participating in the next stages of the Plan. In regard to the next stages of the plan, we request to be notified of the following: The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination; and That the Inspector's Report (including any recommendations) into the examination of the Wiltshire Housing Site Allocations Plan has been published.</p>
Attached files (Please see Objective)	4726898
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2086	Consultee Rivington Land Person ID: 1131666	Agent Diana Thomson Associate Director Person ID: 1131662	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		THE MALTINGS AND CENTRAL CAR PARK SITE, SALISBURY CITY CENTRE			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED LETTER: Savills The Maltings Salisbury Reps 22 09 17</p> <p>Thank you for providing us with the opportunity to engage in the consultation on the Council's Pre- Submission Draft Housing Site Allocations Plan. We write on behalf of our client, Rivington Land, who act as THRE's development manager for the Maltings and Central Car Park site in Salisbury City Centre.</p> <p>It is acknowledged that the Maltings and Central Car Park site is already allocated for retail-led mixed use development within Core Policy 21 of the adopted Wiltshire Core Strategy (January 2015). Core Policy 20 identifies the Central Car Park site as having the capacity to deliver 200 residential dwellings as part of this allocation. However, the site has not been identified within the Pre-Submission Draft Housing Site Allocations Plan, which we comment on below.</p> <p>Comments on the Pre-Submission Draft Housing Site Allocations Plan As a general comment, we note that the National Planning Policy Framework (NPPF) requires all plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. Paragraph 158 of the NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Core Strategy Policy 2 seeks the delivery of a total of 42,000 new homes in Wiltshire, including 10,420 in the South Wiltshire Housing Market Area (HMA), and 6,060 within Salisbury. The Pre-Submission Draft Housing Site Allocations Plan seeks to maintain these housing targets. We strongly feel that the Council has a responsibility to assist in addressing the national housing shortage, which particularly affects the south of England, and therefore more efforts should be made to allocate additional land for housing. Whilst the Maltings and Central Car Park site has an allocation within the Wiltshire Core Strategy, it is not explicitly mentioned within the Pre-Submission Draft Housing Site Allocations Plan. We strongly recommend that this document should be revised to take account of the circa 200 residential dwellings which could come forwards at the Maltings and Central Car Park site. Opportunities for more than 200 dwellings to be delivered at the site (as part of a retail-led mixed use development) should be encouraged to assist in meeting the national and local unmet housing needs and to "boost significantly the supply of housing", as sought by Paragraph 47 of the NPPF.</p> <p>Future Participation We trust that the above is of assistance in the preparation of the Housing Site Allocations Local Plan. We would like to be kept up to date with the progress and look forward to further opportunities to engage.</p>				

	We look forward to confirmation of receipt of these representations. Please feel free to contact me if you have any queries or if you would like to discuss.
Attached files (Please see Objective)	4726810
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2087	Consultee Mrs K Bond Person ID: 1131667	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over on appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2088	Consultee Mrs K Bond	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131667	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Accessibility from sites 3565, 3620 and 1021</p> <p>The A361 is a blackspot for accidents both "in the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2089	Consultee Mrs K Bond	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131667		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Maintaining the local environment Sites 1021 and 3620</p> <p>It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2090	Consultee Mrs K Bond	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131667	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Maintaining the local environment Sites 1021 and 3620</p> <p>In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archaeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2091	Consultee Mrs Josephine Roberts	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131676		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Boundary hedgerows / tree lines • Lambrok Stream <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats.</p> <p>This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal. Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2092	Consultee Mr P Bond	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131683		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Contradictions in the Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. Paragraphs 72, 111,156 and 157 of The National Planning Framework and Planning Guidance documents state that local policy should provide: The infrastructure required in the area, be drawn up over on appropriate timescale (15 years suggested), identify where building would be inappropriate because of its environmental and historic interest and look to enhance the natural, built and historic environment. I do not feel that the strategy delivers the development and infrastructure required by Trowbridge. The core strategy includes the provision of new schools at the West Ashton Site however these will not be completed in time and there is no mention of the much needed development of the near empty town centre. In fact, the council has discounted a number of brownfield sites on the basis that they are within the existing settlement boundary. It seems unbelievable that greenfield sites have been preferred over the many brownfield sites which exist within the town. This is not sustainable development, rather opting for developer friendly sites.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2093	Consultee Mr P Bond	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131683	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Accessibility from sites 3565, 3620 and 1021</p> <p>The A361 is a blackspot for accidents both "in the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. Further access points, even with tightened speed restrictions would only make matters worse. Also, sites at Church lane, Southwick Court and Old Brickfields are being considered as they would reduce traffic (as residents would walk into Trowbridge rather than using their own vehicles) No evidence has been provided that this would be the case. Since the majority of households have 2 cars there could be an extra 400 cars travelling along, the already congested Frome Road at rush hour. The Councils view that they can justify development here as opposed to local villages on the basis that it provides sustainable development is clearly in question. There is neither the infrastructure or setting for development on this side of town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2094	Consultee Mr P Bond	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131683	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns regarding the Draft Wiltshire Housing Sites Allocation Plan. I live in the vicinity of the Church Lane and Southwick Court sites which have been put forward as preferred sites within the housing allocation plan. My concerns are as follows:</p> <p>Maintaining the local environment Sites 1021 and 3620</p> <p>It is well known that the fields behind Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide a useful habitat for deer, foraging rare bats, rabbits, voles and a host of birds.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2095	Consultee Mr P Bond	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131683	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Church Lane; Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Maintaining the local environment Sites 1021 and 3620 In addition, the ancient hedgerows and fields provide the setting for at least 5 listed buildings as well as an archaeological site of an ancient watermeadow. These need to be protected as stated in the National Planning Framework and the Core Strategy itself.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2096	Consultee Britt Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in regards to the proposed housing allocation for sites 3565 and 1021, representing approximately 250 new homes. I have examined the published proposals and I know both sites well, as we own property on Westmead Crescent and Church Fields. I wish to strongly object to the proposed housing allocations on these sites.</p> <p>These sites, along with the Upper Studley site (which is also objectionable), collectively, form the boundary gap between Trowbridge and the villages of Southwick and North Bradley. Development in these sites must be very carefully considered: infilling will ruin the character of these lovely villages, overwhelm local services, and will have a vast array of other undesirable side effects.</p> <p>It may be argued that infilling these boundaries is not in accordance with paragraph 64 of the national planning policy framework, which states that “permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions” – we do not believe that any sort of new housing estate in these areas can possibly hope to achieve improvement in character and quality of these villages or the Bradley Gardens estate they border, and in no way will help to improve the way they function.</p> <p>I also believe that infilling these gaps is in direct contradiction to previous Wiltshire Council planning documents and decisions. Specifically, in a recent Wiltshire Times article, Councillor Geoff Whiffen said “Wiltshire Council go against their own core strategy. That document stated that developments should not be built where villages are swallowed up by towns, yet that is happening.” This is an accurate way to describe the potential outcomes if these proposals are allowed through: it will be impossible to differentiate Southwick and North Bradley from Trowbridge. In this same article, Councillor Whiffen also referenced another recent planning decision that did pass: the erection of a solar farm off Axe and Cleaver Lane. Councillor Whiffen stated that the reason the solar farm was located in this position was specifically to avoid being near houses. Clearly, if housing is built around this development, that will no longer be true.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2097	Consultee Britt Smith Person ID: 1131696	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Further, in addition to killing two beautiful, well-established, historic villages, the proposal is ill-considered for a plethora of important reasons. First, all sites proposed on this side of town have poor access routes. Frome Road is already exceedingly busy at peak times of day, and the traffic is fast moving, with almost no drivers slowing to 30 miles per hour as they enter Trowbridge limits: many people drive through the dip on Frome Road at speeds approaching 50 miles per hour, and only ease up as they pass Church Fields and hit the stop light at College Road. I speak from experience when I say that turning out of Church Lane is dangerous – I lived at 4 Church Fields for 3 years, and I never got used to peeking the nose of my car out. If additional traffic is expected to enter and exit at Church Lane or at another narrow lane on either side of Frome Road, it is only a matter of time before there is a fatal accident. Further, there are natural barriers to building additional access off Frome Road – including Lambrok Stream and the ancient hedgerows on the side nearest site 3565. It is unfathomable to think of cutting into the hedgerows – and if my understanding is correct, prohibited to do under law for any permanent reason. These hedgerows meet the criteria for protection, and cannot be permanently breached. Building under or over Lambrok Stream also presents difficulties, and run off and pollution from cars using any road built must be carefully considered and mediated. Since moving to Westmead Crescent, I have also experienced the flow of traffic off Silver Street Lane and down Marston Road, which is very steady, despite the road being difficult to navigate due to the significant number of cars that park on both sides of the road. Many student drivers are also brought down this road to teach them how to execute parking manoeuvres. Most worryingly, there are many children in the area and there are no zebra or pelican crossings for them to use. Increasing the flow of traffic here to access Southwick Court or Elm Grove Farm will surely increase the possibility of accidents. Someone will get hurt. On a less severe note, the increased traffic on Frome Road and down Marston Road/Silver Street Lane will prove a nuisance to all residents on these streets – particularly those close to junctions. The increased number of vehicles will contribute to increased noise pollution, increased light pollution at night, and, likely, increased insurance premiums.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2098	Consultee Britt Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Beyond the danger and irritation that the increased traffic and poor access routes will entail, we must consider that adding several hundred additional homes into this area will strain local services. This area is served by Grove Primary School, Studley Green Primary School, and the Southwick Primary School. According to a recent article in the Wiltshire Times, Clare Medland, Wiltshire Council's head of school place commissioning, stated that "if hundreds of homes are built in Trowbridge and the surrounding areas, the area would desperately need one or even two new primary schools to cater for incoming pupils".</p> <p>I do not believe the three currently sufficient primary schools would continue to be sufficient in the event that the proposal goes through. There will not be enough places for local children, and as young families grow, the crisis will become even more dire. Many couples on these estates are just starting out – as they mature, they will start to have children and will need local places for them. Should we be forced to take our children to other areas of town or to enroll them in private primary schools so that they have the opportunity to attain a good quality education?</p> <p>When we attended the open day for the proposal at the County Hall over the summer, we had the opportunity to speak with Mayor Deborah Halik, who suggested there might be a new school on the West Ashton side of town. Of course, while the school spaces are certainly needed and would surely be appreciated by residents on that side of Trowbridge, it is not a sustainable distance from the Bradley Gardens estate – it cannot be walked, and therefore would require that I drive our children to and from school. Many other parents would be in the same situation. In this same vein, I do not believe that the doctor's surgeries or the Trowbridge Hospital are equipped to support a significant population influx. It can be difficult to find a practice accepting new patients, and once you are accepted, you face lengthy wait times to be seen due to the high number of registered patients needing care. Visiting the Trowbridge Hospital shows a similar problem: lengthy wait times by an understaffed, poorly equipped facility that cannot cope with any sort of serious injury.</p> <p>I would also suggest that, based on previously enacted pay freezes for emergency responders like fire fighters and police officers, Wiltshire Council is unable to support increased demands on emergency services for a significantly higher population. Council tax has been raised year on year, and yet these critical services have been unable to grow or to increase compensation for their employees, and other previously enjoyed services, like green waste, have been forced to be removed from the standard services supported by our council tax. Clearly, there is still significant budget pressure – adding more demands to this already strained budget will not result in good outcomes for any of us dependent on these services, even considering the increased council tax revenue these homes are likely to generate.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2099	Consultee Britt Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Beyond the danger and irritation that the increased traffic and poor access routes will entail, we must consider that adding several hundred additional homes into this area will strain local services. This area is served by Grove Primary School, Studley Green Primary School, and the Southwick Primary School. According to a recent article in the Wiltshire Times, Clare Medland, Wiltshire Council's head of school place commissioning, stated that "if hundreds of homes are built in Trowbridge and the surrounding areas, the area would desperately need one or even two new primary schools to cater for incoming pupils".</p> <p>I do not believe the three currently sufficient primary schools would continue to be sufficient in the event that the proposal goes through. There will not be enough places for local children, and as young families grow, the crisis will become even more dire. Many couples on these estates are just starting out – as they mature, they will start to have children and will need local places for them. Should we be forced to take our children to other areas of town or to enroll them in private primary schools so that they have the opportunity to attain a good quality education?</p> <p>When we attended the open day for the proposal at the County Hall over the summer, we had the opportunity to speak with Mayor Deborah Halik, who suggested there might be a new school on the West Ashton side of town. Of course, while the school spaces are certainly needed and would surely be appreciated by residents on that side of Trowbridge, it is not a sustainable distance from the Bradley Gardens estate – it cannot be walked, and therefore would require that I drive our children to and from school. Many other parents would be in the same situation. In this same vein, I do not believe that the doctor's surgeries or the Trowbridge Hospital are equipped to support a significant population influx. It can be difficult to find a practice accepting new patients, and once you are accepted, you face lengthy wait times to be seen due to the high number of registered patients needing care. Visiting the Trowbridge Hospital shows a similar problem: lengthy wait times by an understaffed, poorly equipped facility that cannot cope with any sort of serious injury.</p> <p>I would also suggest that, based on previously enacted pay freezes for emergency responders like fire fighters and police officers, Wiltshire Council is unable to support increased demands on emergency services for a significantly higher population. Council tax has been raised year on year, and yet these critical services have been unable to grow or to increase compensation for their employees, and other previously enjoyed services, like green waste, have been forced to be removed from the standard services supported by our council tax. Clearly, there is still significant budget pressure – adding more demands to this already strained budget will not result in good outcomes for any of us dependent on these services, even considering the increased council tax revenue these homes are likely to generate.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2100	Consultee Britt Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Additionally, it is a well-known fact that the area referred to as Southwick Court is seriously prone to flooding, and does so with regularity (some local residents who have been in Trowbridge for decades told me that it happens annually). In fact, after reviewing the Environment Agency Surface Flood Maps, I understand that some areas of these fields are actually classed as Flood Zone 3, which have a high probability of flooding. Likelihood of flooding will be further increased when development is executed within the catchment area of the water courses.</p> <p>It should also be noted that further surveys and photographic evidence of floods in recent years suggest that the flood plain borders as defined in available documentation are inaccurate and do not describe the full extent of the flood plain. This means that, even in areas that are “safe(r)” from flooding, there is still real danger of flood waters and thus, the areas surrounding the defined flood plains may not truly be suitable for development.</p> <p>We firmly believe that it is unfair to build new properties on a site that is known to have such issues and expect the new home owners to deal with them when they inevitably occur. We can avoid the heartache and expense for them by simply choosing to build elsewhere.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2101	Consultee Britt Smith Person ID: 1131696	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On a communal note, I would also like to raise my objection to the destruction of our shared green space. Hundreds of people enjoy the green space that forms the boundary between Trowbridge and North Bradley and Southwick every day. Children play there. Families take their dogs on walks. People spend time in nature decompressing. The entire community of Trowbridge and all of those in the surrounding villages benefit from the preservation of this green space.</p> <p>I moved to Westmead Crescent at a very difficult time in my life, and I have found the Boundary Walk area to be exceedingly calming and good for my mental health. I would be heartbroken to lose the wide open spaces that have brought me such peace, and I know I am not alone in this. Lastly, I think it is fair to fear that significant development in these areas will have detrimental effects for the people already resident in these areas (Church Fields, Upper Studley, Bradley Gardens, North Bradley, Southwick, etc.) – which is worth considering, as it will impact thousands of people who have invested their savings in a home they expected to appreciate in value and that they would be able to enjoy in peace and tranquility. Those of us who live on these estates will be expected to accept lower property values, increased insurance rates, and increased noise and light pollution due to higher traffic. It is a lose-lose for us.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2102	Consultee Britt Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On a communal note, I would also like to raise my objection to the destruction of our shared green space. Hundreds of people enjoy the green space that forms the boundary between Trowbridge and North Bradley and Southwick every day. Children play there. Families take their dogs on walks. People spend time in nature decompressing. The entire community of Trowbridge and all of those in the surrounding villages benefit from the preservation of this green space.</p> <p>I moved to Westmead Crescent at a very difficult time in my life, and I have found the Boundary Walk area to be exceedingly calming and good for my mental health. I would be heartbroken to lose the wide open spaces that have brought me such peace, and I know I am not alone in this. Lastly, I think it is fair to fear that significant development in these areas will have detrimental effects for the people already resident in these areas (Church Fields, Upper Studley, Bradley Gardens, North Bradley, Southwick, etc.) – which is worth considering, as it will impact thousands of people who have invested their savings in a home they expected to appreciate in value and that they would be able to enjoy in peace and tranquility. Those of us who live on these estates will be expected to accept lower property values, increased insurance rates, and increased noise and light pollution due to higher traffic. It is a lose-lose for us.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2103	Consultee Britt Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Destroying this green space will also mean the destruction of many mature trees and hedges, and will result in significant loss of wild life. Many birds, voles, mice, badgers, and foxes, amongst other things, make their homes in these fields. Stealing their homes for the benefit of complying with a top-down forced housing proposal is wrong.</p> <p>Specifically, though, we must call attention to the habitat requirements of Bechstein's bats. The Housing Allocation Plan identifies that there are Bechstein's bats in the area, but it fails to highlight the fragility of the species.</p> <p>According to the Bat Conservation Trust, this breed of bat is one of the rarest in the UK – in fact, there are only 6 breeding populations in all of the country. All bats and their roosts are protected by the law. Disturbing these fields, even with sympathetic intentions, could mean the total destruction of this incredibly rare breeding population and must be avoided.</p> <p>We should look to the example of what has happened to the bat population at Green Lane Woods as a warning and heed the lessons learned. From page 80 of the Habitats Regulations Assessment, released 21/9/2017:</p> <p>“Counts have been made of Bechstein's bats using bat boxes in Green Lane Wood since 1999. These show that the maternity colony regularly stood at 17 to 71 bats between 2004 (average 44 bats). Numbers fell dramatically in 2012 to 2014 to an average of two bats which coincided with the peak period of construction and occupation for the two nearby development sites.”</p> <p>Proximal development has a demonstrable negative impact on Bechstein's bats. Care was taken to protect this species in the surrounding development work and it nevertheless decimated the maternity population in the colony. So-called protective measures are clearly insufficient to shield these populations from damage.</p> <p>Additionally, it should be noted that the Southwick Court area is part of the government's programme for Higher Level Environment Stewardship scheme. This means that significant measures have been enacted to preserve the landscape in respect of the character of the area. If development is allowed to proceed, all investment in this area for this purpose will be wiped away, and any previously achieved benefits in ecology or environmental conservation will be lost.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2104	Consultee Britt Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131696	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Destroying this green space will also mean the destruction of many mature trees and hedges, and will result in significant loss of wild life. Many birds, voles, mice, badgers, and foxes, amongst other things, make their homes in these fields. Stealing their homes for the benefit of complying with a top-down forced housing proposal is wrong.</p> <p>Specifically, though, we must call attention to the habitat requirements of Bechstein's bats. The Housing Allocation Plan identifies that there are Bechstein's bats in the area, but it fails to highlight the fragility of the species.</p> <p>According to the Bat Conservation Trust, this breed of bat is one of the rarest in the UK – in fact, there are only 6 breeding populations in all of the country. All bats and their roosts are protected by the law. Disturbing these fields, even with sympathetic intentions, could mean the total destruction of this incredibly rare breeding population and must be avoided.</p> <p>We should look to the example of what has happened to the bat population at Green Lane Woods as a warning and heed the lessons learned. From page 80 of the Habitats Regulations Assessment, released 21/9/2017:</p> <p>“Counts have been made of Bechstein's bats using bat boxes in Green Lane Wood since 1999. These show that the maternity colony regularly stood at 17 to 71 bats between 2004 (average 44 bats). Numbers fell dramatically in 2012 to 2014 to an average of two bats which coincided with the peak period of construction and occupation for the two nearby development sites.”</p> <p>Proximal development has a demonstrable negative impact on Bechstein's bats. Care was taken to protect this species in the surrounding development work and it nevertheless decimated the maternity population in the colony. So-called protective measures are clearly insufficient to shield these populations from damage.</p> <p>Additionally, it should be noted that the Southwick Court area is part of the government's programme for Higher Level Environment Stewardship scheme. This means that significant measures have been enacted to preserve the landscape in respect of the character of the area. If development is allowed to proceed, all investment in this area for this purpose will be wiped away, and any previously achieved benefits in ecology or environmental conservation will be lost.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2105	Consultee Britt Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131696		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>If further housing really must be built in Trowbridge, I question why existing brownfield sites, such as the derelict Bowyers site, have not been first in line for redevelopment.</p> <p>These brownfield areas are closer to public transport and closer to local amenities. Their development will not harm the local environment or wildlife nor the character of the surrounding area (in fact, they will significantly improve the visual appeal of the town), will improve safety by removing abandoned and potentially unstable structures, and because they are already in areas with safe access routes and slower moving traffic, will not substantially increase risk of vehicle accidents.</p> <p>It is in the interest of all residents of Trowbridge to see the brownfield sites redeveloped – developers should be properly incentivized to utilize this available space first before setting their sights on green spaces, and Wiltshire Council needs to enact and enforce planning guidelines that effectively police developer greed to protect all of its residents' interests.</p> <p>Wiltshire Council has an obligation to the residents of Trowbridge, Southwick, and North Bradley to ensure that the benefits of new housing outweigh the costs. It seems that, in this case, rather than properly exploring other options and understanding what their proposal means to local residents, they have simply chosen the easiest targets.</p> <p>I call on Wiltshire Council to stay true to their core planning strategy, to think about the people who will be impacted by these lazy proposals, to consider the permanent impacts of their decisions on the surrounding environment, and to choose what is right rather than what is easy. Once built, these homes cannot be unbuilt – and we must all live with the consequences.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2106	Consultee Ms Jane Withers	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131705	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I feel that The planners have not been to view the sight of the proposed housing developments in Netheravon and Harnham. The infrastructure is not there to support extra housing. Surely the roads should be in place before building and I have not heard of any plans to insure that the infrastructure will be in place. The traffic into Harnham is already over 70% Capacity and once it reaches the Harnham gyratory the results will be chaotic.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2107	Consultee J. M. Pratt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131712	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	With respect to the Ridgeway Farm Development I have concerns about the quantity of houses that are to be built which seem to have grown from the original 10 to 40+. I supported the original 10 reluctantly, simply on the grounds that there is a need for more housing and I think that Crudwell has to take its share with other villages in the area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2108	Consultee J. M. Pratt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131712	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I share concern with many of the issues that have been put forward by others and in particular the flooding of late which luckily missed my house, but caused serious distress to the villagers affected some of whom I have known for decades.</p> <p>This village sits at the centre of a bowl, you can freewheel a long way on a bike from both East and West on the A429 into the centre and from North on Tetbury Lane - and so can water. What is not so obvious is that the road where the A429 sweeps up to the garage is actually an unintentional levee which is why Goosey Corner is so prone to flooding without constant maintenance and will remain so. In storm conditions this aggravates an already stressed system. The flood plain to the South has been inadequate in clearing storm water in the past and there is no reason to think it will improve. Thus pouring concrete by the ton just up Tetbuty Lane is only adding to the misery lower down thus my reluctance to support the additional 10 houses.</p> <p>However, the above is to state my general position on this issue.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2109	Consultee Mr Chris Skinner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131722		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Boundary hedgerows / tree lines • Lambrok Stream <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats.</p> <p>This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal. Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2110	Consultee J. M. Pratt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131712		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>An item which I have not seen mentioned anywhere else is a path that is under construction from the Playing Field down to a position just opposite the beginning of the development. Its construction has involved grubbing out some of the embankment and work to shore up the remaining earth and also, by the look of things, the removal of a telegraph pole in due course, quite a serious bit of work. The path has obviously been primarily provided for the use of the prospective purchasers of the houses on the Ridgeway development. I have no problem with the path per say but it does beg the question, what about the rest of us? Many years ago I was involved with others from the village in the construction of the what was then termed the 'Swing Park' which is now part of the Playing Field and the effort put in then and since was on behalf of all the residents of the village. The path being provided I am sure is available for all to use but the difficulty for the rest of us is getting to it. Just a little further down towards the village Tetbury Lane is very much a country lane with high hedgerows and no easy escape route if there is a traffic mishap. Thus the path rather gives the impression of a somewhat privileged and safer access for some to a playing field and car park which many of us put effort into providing for the common good and will now have to contend with additional traffic generated by this development to get there. There is also the puzzle as to why the widest part of the road is effectively widened by the addition of a pavement and the narrowest part is ignored. Why wasn't the path extended down to the Butts!</p> <p>I can see what the sales force for the development get out of the provision of this path, the benefit to the rest of us is not so clear! My hope with this email is to contribute to the debate about providing a reasonable and proportionate number of new houses and safe access to the Playing Field for the village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2111	Consultee The Trustees of Lord Seymour's 1971 Settlement/Sherborne Holdings	Agent Mr Ben Jukes Senior Land Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131720	Person ID: 1131715	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sydenhams Timber Merchants, Maiden Bradley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED DOCUMENTS: Sydenhams yard letter, Sydenhams yard site plan Please find attached details for a proposed site for consideration as part of the local Plan review process. Below I have set out a brief appraisal of the site and its context that I trust will assist you in assessing the suitability of the site for inclusion within the review as a potential residential allocation. Site Address -Sydenhams Timber Merchants, Bradley Lane, Maiden Bradley, Warminster Wilts BA12 7JR. Site Area - As shown edged red on the attached plan. Ownership - The Trustees of Lord Seymour's 1971 Settlement and Sherborne Holdings Ltd. The owners are willing to release the site for development. Current Use - Timber Yard in connection with Sydenhams Timber Merchants. Area - Approximately 0.88ha 2.18 acres. Proposed Development - Residential Development with associated infrastructure. Infrastructure Requirement/Capacity of utilities - Believed to be adequate but further investigation required Market Viability Good Availability Within 5 years Constraints The site lies outside of the current Maiden Bradley village curtilage and is within the village Conservation Area. Opportunities The site has an existing brown field use and adjoins the existing Settlement Boundary. The site would form a natural extension to the existing Settlement Boundary and could make a contribution to housing needs without undue impact on the wider planning objectives. I trust this provides you with sufficient detail for consideration of the site as part of the Wiltshire Housing Site Allocation Plan.</p>				
Attached files (Please see Objective)	4726984 / 4726983				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2112	Consultee Britt Smith Person ID: 1131696	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
					Do you consider the draft WHSAP is sound?
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include: • Boundary hedgerows / tree lines • Lambrok Stream These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal. Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I feel the bats have not received sufficient consideration upon review of all documentation and wish to advocate on their behalf.				

Comment ID:	2113	Consultee Mrs A.C. Purves Parish Clerk Pitton and Farley Parish Council Person ID: 392675	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?		
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.74				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Please note that the consultation response sent earlier today (below) was incorrect, and the following text represents the Parish Council's agreed view.</p> <p>Until the flooding issue is resolved, it is not appropriate or advisable to include additional land within the settlement boundary. We do not want a repeat of Salisbury District Council's action in the 1970s of approving plans for new houses against local advice, only for the foreseeable and predictable increase in flood damage to occur.</p> <p>Pitton & Farley Parish Council notes the proposal to increase the settlement boundary by adding a large area (1.15 ha) in the middle of the village, and other areas to the west. The Parish Council formally objects to the inclusion of the land in the middle of the village within the settlement boundary as part of this review.</p> <p>Pitton is a village that suffers periodically (recently every three years on average) from very serious groundwater flooding. Houses are flooded, roads are closed, businesses are adversely affected, and in particular the foul water drainage system is overwhelmed, with homes suffering from backflow of sewage into their toilets. The flooding and its consequences cause considerable distress for extended periods of time. In short, flooding is a local disaster.</p> <p>Pitton & Farley Parish Council believes that it is premature to extend the settlement boundaries until works to fully alleviate groundwater flooding and its consequences are completed and proven to work successfully in actual flood conditions.</p> <p>Therefore we formally object to the proposed changes to the boundary.</p> <p>Please see below the Parish Council's response to the above mentioned consultation.</p> <p>"Pitton is a village that suffers periodically (recently every three years on average) from very serious groundwater flooding. This causes distress to many who live in the village, as houses are flooded, roads are closed, businesses are adversely affected, and in particular the foul water drainage system is overwhelmed, with homes suffering from back flow of sewage into their toilets. In short, flooding is a local disaster.</p> <p>Pitton & Farley Parish Council notes the proposal to increase the settlement boundary by adding a large area (1.15 ha) in the middle of the village and other areas to the west. We do not feel that it is appropriate at this time to extend the settlement boundaries until the flooding issue is resolved, whatever the financial cost. We would not want a repeat of Salisbury District Council's action in the 1970s of approving plans for new houses against local advice, only for the predictable increase in flood damage to occur.</p> <p>Pitton & Farley Parish Council believes that it would be irresponsible, even negligent, to extend the settlement boundaries until it is agreed by this Council that works to fully alleviate groundwater flooding and its consequences are successfully completed.</p> <p>Therefore we formally object to the proposed changes to the boundary."</p> <p>the Council very much hopes you will take its views and local knowledge into account.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2114	Consultee Mr David Wilson Person ID: 1131555	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I support the Council in principle in allocating additional land for much needed additional housing, however S1027 and S1028 are not sound because any mitigation proposed as part of the Transport Assessments accompanying a future planning application will not be able to mitigate the severe congestion at the A3094 Harnham Gyratory and Newbridge Road. The junctions are at capacity and currently suffer from significant queueing at various times daily. The queues extend back along Harnham Rd adjacent to residential properties. It is a key constraint on the highway network.</p> <p>The majority of development sites in the draft allocation plan are located in areas where investment in highway infrastructure can adequately mitigate the additional development traffic by providing additional capacity on the highway network. However in this case S1027 and S1028 are not sound because Newbridge Rd is the only vehicular river crossing between Harnham and Salisbury (other than the old Harnham Bridge). Due to land constraints at the junctions either end of the Newbridge Rd there is no scope to significantly increase capacity. In the 1990's the former Wiltshire County Council proposal to overcome this constraint by proposing a new river crossing further downstream (Downtown Rd, Harnham to Southampton Rd) was rejected at Public Inquiry. There is therefore no scope to provide a new link to the main road network to the east and north east of Salisbury.</p> <p>As a result the site will not be able to be delivered and will result in Wiltshire Council failing to meet their land supply obligations. The detailed Transport Assessment at the outline planning stage will find the site to be unviable. I therefore strongly object to the land at sites S1027 and S1028 being allocated as they cannot be justified when compared with other more viable sites north of Salisbury (ie north of the River Nadder constraint). Alternative SHLAA sites to the north of Salisbury are much more viable and deliverable as they can easily be linked to the principal road network ie A36 Southampton/A30 Andover/A303.</p> <p>I am a chartered civil engineer with many years of experience working as a highway development planner. I believe it is not sound to allocate this site and your summary of SA OBJECTIVE 10 (see below) confirms that a detailed transport impact assessment has not yet been done and will be required to understand impacts on the local and strategic road network and how these will be mitigated. If this work is done after the site is allocated and the additional traffic cannot be mitigated the site will not gain permission and as a result the Council will be at a significant risk of failing to deliver their housing supply targets</p> <p>SUMMARY OF SA OBJECTIVE 10</p> <p>The site is located to the South of Salisbury, 1.7km from the city centre. This site is in a fairly accessible location for the city centre that could help reduce the need to travel and/or reliance on the private car. A detailed transport impact assessment will be required to understand impacts on the local and strategic road network and how these will be mitigated.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	2115	Consultee Mr David Wilson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131555	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I support the Council in principle in allocating additional land for much needed additional housing, however S1027 and S1028 are not sound because any mitigation proposed as part of the Transport Assessments accompanying a future planning application will not be able to mitigate the severe congestion at the A3094 Harnham Gyratory and Newbridge Road. The junctions are at capacity and currently suffer from significant queueing at various times daily. The queues extend back along Harnham Rd adjacent to residential properties. It is a key constraint on the highway network.</p> <p>The majority of development sites in the draft allocation plan are located in areas where investment in highway infrastructure can adequately mitigate the additional development traffic by providing additional capacity on the highway network. However in this case S1027 and S1028 are not sound because Newbridge Rd is the only vehicular river crossing between Harnham and Salisbury (other than the old Harnham Bridge). Due to land constraints at the junctions either end of the Newbridge Rd there is no scope to significantly increase capacity. In the 1990's the former Wiltshire County Council proposal to overcome this constraint by proposing a new river crossing further downstream (Downtown Rd, Harnham to Southampton Rd) was rejected at Public Inquiry. There is therefore no scope to provide a new link to the main road network to the east and north east of Salisbury.</p> <p>As a result the site will not be able to be delivered and will result in Wiltshire Council failing to meet their land supply obligations. The detailed Transport Assessment at the outline planning stage will find the site to be unviable. I therefore strongly object to the land at sites S1027 and S1028 being allocated as they cannot be justified when compared with other more viable sites north of Salisbury (ie north of the River Nadder constraint). Alternative SHLAA sites to the north of Salisbury are much more viable and deliverable as they can easily be linked to the principal road network ie A36 Southampton/A30 Andover/A303.</p> <p>I am a chartered civil engineer with many years of experience working as a highway development planner. I believe it is not sound to allocate this site and your summary of SA OBJECTIVE 10 (see below) confirms that a detailed transport impact assessment has not yet been done and will be required to understand impacts on the local and strategic road network and how these will be mitigated. If this work is done after the site is allocated and the additional traffic cannot be mitigated the site will not gain permission and as a result the Council will be at a significant risk of failing to deliver their housing supply targets</p> <p>SUMMARY OF SA OBJECTIVE 10</p> <p>The site is located to the South of Salisbury, 1.7km from the city centre. This site is in a fairly accessible location for the city centre that could help reduce the need to travel and/or reliance on the private car. A detailed transport impact assessment will be required to understand impacts on the local and strategic road network and how these will be mitigated.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	2116	Consultee Mr David Wilson Person ID: 1131555	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The proposal to include S1027 and S1028 in the allocation plan is not sound for the following reasons</p> <ol style="list-style-type: none"> 1. Both sites will lead to exacerbation of traffic on the route between the sites and Salisbury City Centre. 2. The additional congestion will lead to an unacceptable reduction in air quality in Harnham due to increases in NO2 , SO2 and PM10 on the approaches to Harnham Gyratory/Newbridge Rd a junction which is already operating over capacity. 3. The development will fail to minimise the impact of development on climate change due to additional traffic congestion 4. The site is undeliverable because outline planning will not be granted due to unacceptable impact on traffic congestion. 5. The Transport Assessment measures will not be able to mitigate the impact of the development due to physical constraints on the existing highway <p>It is important that the following statement is relayed to the Inspector -</p> <p>I support the Council in principle in allocating additional land for much needed additional housing, however S1027 and S1028 are not sound because any mitigation proposed as part of the Transport Assessments accompanying a future planning application will not be able to mitigate the severe congestion at the A3094 Harnham Gyratory and Newbridge Road. The junctions are at capacity and currently suffer from significant queueing at various times daily. The queues extend back along Harnham Rd adjacent to residential properties. It is a key constraint on the highway network.</p> <p>The majority of development sites in the draft allocation plan are located in areas where investment in highway infrastructure can adequately mitigate the additional development traffic by providing additional capacity on the highway network. However in this case S1027 and S1028 are not sound because Newbridge Rd is the only vehicular river crossing between Harnham and Salisbury (other than the old Harnham Bridge). Due to land constraints at the junctions either end of the Newbridge Rd there is no scope to significantly increase capacity. In the 1990's the former Wiltshire County Council proposal to overcome this constraint by proposing a new river crossing further downstream (Downtown Rd, Harnham to Southampton Rd) was rejected at Public Inquiry. There is therefore no scope to provide a new link to the main road network to the east and north east of Salisbury.</p> <p>As a result the site will not be able to be delivered and will result in Wiltshire Council failing to meet their land supply obligations. The detailed Transport Assessment at the outline planning stage will find the site to be unviable. I therefore strongly object to the land at sites S1027 and S1028 being allocated as they cannot be justified when compared with other more viable sites north of Salisbury (ie north of the River Nadder constraint). Alternative SHLAA sites to the north of Salisbury are much more viable and deliverable as they can easily be linked to the principal road network ie A36 Southampton/A30 Andover/A303.</p> <p>I am a chartered civil engineer with many years of experience working as a highway development planner. I believe it is not sound to allocate this site and your summary of SA OBJECTIVE 10 (see below) confirms that a detailed transport impact assessment has not yet been done and will be required to understand impacts on the local and strategic road network and how these will be mitigated. If this work is done after the site is</p>			

	<p>allocated and the additional traffic cannot be mitigated the site will not gain permission and as a result the Council will be at a significant risk of failing to deliver their housing supply targets</p> <p>SUMMARY OF SA OBJECTIVE 10</p> <p>The site is located to the South of Salisbury, 1.7km from the city centre. This site is in a fairly accessible location for the city centre that could help reduce the need to travel and/or reliance on the private car. A detailed transport impact assessment will be required to understand impacts on the local and strategic road network and how these will be mitigated.</p> <p>I therefore strongly object to the land at sites S1027 and S1028 being allocated as they cannot be justified when compared with other more viable sites north of Salisbury (ie north of the River Nadder constraint). Alternative SHLAA sites to the north of Salisbury are much more viable and deliverable as they can easily be linked to the principal road network ie A36 Southampton/A30 Andover/A303.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2117	Consultee Mr David Wilson Person ID: 1131555	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The proposal to include S1027 and S1028 in the allocation plan is not sound for the following reasons</p> <ol style="list-style-type: none"> 1. Both sites will lead to exacerbation of traffic on the route between the sites and Salisbury City Centre. 2. The additional congestion will lead to an unacceptable reduction in air quality in Harnham due to increases in NO2 , SO2 and PM10 on the approaches to Harnham Gyratory/Newbridge Rd a junction which is already operating over capacity. 3. The development will fail to minimise the impact of development on climate change due to additional traffic congestion 4. The site is undeliverable because outline planning will not be granted due to unacceptable impact on traffic congestion. 5. The Transport Assessment measures will not be able to mitigate the impact of the development due to physical constraints on the existing highway <p>It is important that the following statement is relayed to the Inspector -</p> <p>I support the Council in principle in allocating additional land for much needed additional housing, however S1027 and S1028 are not sound because any mitigation proposed as part of the Transport Assessments accompanying a future planning application will not be able to mitigate the severe congestion at the A3094 Harnham Gyratory and Newbridge Road. The junctions are at capacity and currently suffer from significant queueing at various times daily. The queues extend back along Harnham Rd adjacent to residential properties. It is a key constraint on the highway network.</p> <p>The majority of development sites in the draft allocation plan are located in areas where investment in highway infrastructure can adequately mitigate the additional development traffic by providing additional capacity on the highway network. However in this case S1027 and S1028 are not sound because Newbridge Rd is the only vehicular river crossing between Harnham and Salisbury (other than the old Harnham Bridge). Due to land constraints at the junctions either end of the Newbridge Rd there is no scope to significantly increase capacity. In the 1990's the former Wiltshire County Council proposal to overcome this constraint by proposing a new river crossing further downstream (Downtown Rd, Harnham to Southampton Rd) was rejected at Public Inquiry. There is therefore no scope to provide a new link to the main road network to the east and north east of Salisbury.</p> <p>As a result the site will not be able to be delivered and will result in Wiltshire Council failing to meet their land supply obligations. The detailed Transport Assessment at the outline planning stage will find the site to be unviable. I therefore strongly object to the land at sites S1027 and S1028 being allocated as they cannot be justified when compared with other more viable sites north of Salisbury (ie north of the River Nadder constraint). Alternative SHLAA sites to the north of Salisbury are much more viable and deliverable as they can easily be linked to the principal road network ie A36 Southampton/A30 Andover/A303.</p> <p>I am a chartered civil engineer with many years of experience working as a highway development planner. I believe it is not sound to allocate this site and your summary of SA OBJECTIVE 10 (see below) confirms that a detailed transport impact assessment has not yet been done and will be required to understand impacts on the local and strategic road network and how these will be mitigated. If this work is done after the site is</p>			

	<p>allocated and the additional traffic cannot be mitigated the site will not gain permission and as a result the Council will be at a significant risk of failing to deliver their housing supply targets</p> <p>SUMMARY OF SA OBJECTIVE 10</p> <p>The site is located to the South of Salisbury, 1.7km from the city centre. This site is in a fairly accessible location for the city centre that could help reduce the need to travel and/or reliance on the private car. A detailed transport impact assessment will be required to understand impacts on the local and strategic road network and how these will be mitigated.</p> <p>I therefore strongly object to the land at sites S1027 and S1028 being allocated as they cannot be justified when compared with other more viable sites north of Salisbury (ie north of the River Nadder constraint). Alternative SHLAA sites to the north of Salisbury are much more viable and deliverable as they can easily be linked to the principal road network ie A36 Southampton/A30 Andover/A303.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2118	Consultee Kirsty Dougal	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131739	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to express my concern about the proposed development of 40 dwellings at Ridgeway Farm Crudwell. As this would represent around a 20% increase in the current number of dwellings in the village I feel strongly that it will pose increased traffic problems, and pressure on local resources. There is no strategic need for a site of this scale in Crudwell And so I ask you to seriously consider justification for this development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2119	Consultee H G T Developments Ltd	Agent Miss Louise Steele Associate Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131752	Frampton Person ID: 1131750	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On behalf of HGT Developments LLP, we set out the reasons why the draft plan is unsound in its current form below. The plan is not positively prepared because:</p> <p>less than half of the indicative housing requirement allocated for delivery within Trowbridge has not been met, proving that the draft proposals have not been consistently prepared using the evidence gathered;</p> <p>The Plan is contradictory to, and does not reflect, the strategy which was set and approved by the Inspector of the Core Strategy in December 2014; and</p> <p>The plan is not justified as it does not propose to make efficient use of land to be allocated through the Site Allocations Plan. [for representation in full see attached]</p> <p>The Housing Site Allocations Document is unsound as it has not been positively prepared and is not justified due to the fact that the indicative housing requirement which has been set for Trowbridge has not been met through the proposed to be allocated by increasing numbers where possible, which is unsustainable and not consistent with National Policy. [for representation in full see attached]</p>				
Attached files (Please see Objective)	4727014 / 4727015				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Because the issues raised are complex and there is public interest in the site to ensure that our representations can be expanded upon if necessary and to fully explain why we feel the current plan is unsound.				

Comment ID:	2120	Consultee Legal & General Property Legal & General Property Partners (Person ID: 1131754	Agent Danniella Persaud Planner Person ID: 1131747	Do you consider the draft WHSAP is legally compliant?	
		Other		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?			Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury omission sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED DOCUMENTS: Response Harnham Trading Estate, Site Location Plan - Harnham Trading Estate</p> <p>We write on behalf of our client, Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited (“Legal & General”), who have an interest in a site at Harnham Trading Estate and have begun working to develop proposals for its redevelopment.</p> <p>Our client’s site currently comprises a number of commercial buildings, but is not located within a designated employment area. The site is currently located outside of, but immediately adjacent to, the designated settlement of Salisbury. The Pre-Submission Draft Housing Site Allocations Plan seeks to amend the settlement boundary such that the site at Harnham Trading Estate will be included within the settlement of Salisbury, which is welcomed.</p> <p>However, our client is seeking for the site to be allocated for residential development, which would be in line with national guidance which seeks the best and most efficient use of land. In addition local planning policy seeks for residential development to be focused in Principal Settlements such as Salisbury, where the site is located. We set out our detailed comments and justification for the residential development of the site within this letter.</p> <p>The Site</p> <p>The site measures approximately 2.1 hectares in size and is broadly triangular in shape. The site is located on the western edge of West Harnham and is accessed from Netherhampton Road / A3094 to the north. The site is bound by residential properties to the east and by Harnham Business Park, comprising a cash and carry wholesaler, to the west. To the south of the site is a an extensive tree belt beyond which lies open countryside. A site location plan is enclosed with this letter for your reference.</p> <p>The site currently comprises a number of commercial buildings. Areas of hardstanding used for parking associated with each unit are provided across the site. An access road runs north-south through the site from Netherhampton Road to the north, providing vehicular access to all of the units.</p> <p>Comments on the Pre-Submission Draft Housing Site Allocations Plan</p> <p>As a general comment, we note that the National Planning Policy Framework (NPPF) requires all plans to be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. Paragraph 158 of the NPPF requires the use of a proportionate evidence base which provides adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.</p> <p>The Council’s adopted Policies Map identifies the site outside of the designated settlement of Salisbury, albeit it is immediately adjacent to the settlement boundary. The Pre-Submission Draft Housing Site Allocations Plan seeks to amend the settlement boundary such that the site at Harnham Trading Estate will be included within the settlement of Salisbury.</p>				

Whilst the inclusion of the site within the settlement boundary is welcomed, we understand that as a result of this, the site was not taken forward to be allocated as a housing site (as set out in the Salisbury Community Area Topic Paper, June 2017). The site is considered to be suitable, available and deliverable for residential development and as such, a housing allocation is sought.

Proposed Loss of Existing Commercial Use

Despite the site not being specifically allocated as an area protected for industrial or employment uses, Core Strategy Core Policy 35 seeks to protect any land or buildings currently or last used for activities falling within use classes B1, B2 and B8, for such uses. However, whilst the site is currently occupied, it is not considered to meet current needs and continued use of the site for commercial uses is not considered to be appropriate in light of the existing and emerging surrounding residential context.

Proposed Residential Development

Core Strategy Policy 2 seeks the delivery of a total of 42,000 new homes in Wiltshire, including 10,420 in the South Wiltshire Housing Market Area (HMA). The Pre-Submission Draft Housing Site Allocations Plan seeks to maintain these housing targets.

We strongly feel that the Council has a responsibility to assist in addressing the national housing shortage, which particularly affects the south of England, and therefore more efforts should be made to allocate additional land for housing. We consider that the site at Harnham Trading Estate should be allocated for residential development within the Housing Site Allocations Plan in order to assist in meeting the national and local unmet housing needs and to “boost significantly the supply of housing”, as sought by Paragraph 47 of the NPPF.

The site is in a sustainable location for residential development. It is not within the designated Green Belt and is not within an area at risk of flooding.

The site is currently located adjacent to, and is proposed to be included within, the settlement boundary of Salisbury, which is considered to be a Principal Settlement within the Core Strategy. Core Strategy Policy 1 states that Principal Settlements should be the primary focus for development, including the provision of significant levels of new homes. Core Strategy Table 1 seeks the delivery of 6,060 new dwellings in Salisbury City / Wilton Town specifically.

In addition, the site comprises a brownfield site where the development of new residential dwellings is encouraged by both national and local policy. Core Strategy Policy 36 states that the regeneration of brownfield sites within the Principal Settlements will be supported.

Indicative Capacity

Legal & General have begun working on proposals for the redevelopment of the site for residential use. Reference has been made to the Council's Strategic Housing Land Availability Assessment 2012 (published February 2014) with regards to the capacity of the site. In addition, proposals are being developed in response to the design and characteristics of the surrounding area.

It is anticipated that the site could accommodate up to approximately 80 dwellings, which would make a significant contribution towards local housing supply. This would result in a density of approximately 40 dwellings per hectare which is considered to be appropriate for this suburban location and would make the best and most efficient use of this brownfield site, in line with national policy guidance. Furthermore, this quantum of development would increase the financial viability of the site in order to achieve the Council's targets for the provision of affordable housing.

Summary

Overall, the continued use of the site at Harnham Trading Estate for commercial use is not considered to be appropriate. The Council's Employment Land Review recognised the poor quality of the site and commercial spaces as well as the constraints on ongoing commercial use as a result of conflicts with neighbouring residential dwellings. Overall the ELR concluded that the site could be released for non-employment uses.

The redevelopment of the site for alternative uses would have significant regeneration benefits.

Redevelopment of the site for residential development would help to “boost significantly the supply of housing” as sought by Paragraph 47 of the NPPF and is considered to make the best and most efficient use of this sustainable and accessible brownfield location.

Residential development of this brownfield site within a Principal Settlement is supported by national and local planning policy. In addition, the allocation of adjacent sites for residential development further supports that the location to the west of Harnham is suitable for the delivery of new housing.

The site is considered to be suitable, available and deliverable for the development of up to 80 new residential dwellings. As such we consider that the site should be allocated for residential development within the Housing Site Allocations Local Plan.

Attached files (Please see Objective)	4727022 / 4727024
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2121	Consultee Mr Anthony Hardingham Person ID: 1131760	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We have examined the draft Wiltshire Housing Site Allocations Plan and specifically the proposed development of 30 houses on the land east of Farrells Field Yatton Keynell. The proposed development site lies outside the current settlements boundary in open country. As residents that back on to the site we know it well. In response to question 6 on the form, I set out my reasons for the plan being unsound as follows:</p> <p>1) No evidence of housing need for Yatton Keynell The proposal for 30 houses on the land east of Farrells Field has been put forward at County level in order to meet the County's strategic housing requirements for the Chippenham remainder area. The site allocation for 30 houses in Yatton Keynell is not based on any evidence that there is a specific local housing need in Yatton Keynell. Appendix E of the Chippenham Community Area topic paper, confirms that no local housing needs survey was undertaken as part of the draft Plan. The proposed dwellings should be justified with evidence that there is a specific local need and the plan should confirm how that need will be met. In light of the above, the plan is unsound, it is not justified and it is not consistent with national policy set out in paragraph 158 of the NPPF, which states: 'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'.</p> <p>3) Site selection process unsound Para 5.13 of the Chippenham Community Area Remainder Topic Paper - June 2017 states that the village of Sutton Senger, which has an identified housing need, was discounted as a village that could accommodate additional housing growth. The Plan states that the village primary school cannot accommodate growth and therefore the village cannot accommodate more housing. The exclusion of the village from the housing allocation plan seems unjustified as the plan should consider all housing types not just those for families. Just because the school is full that doesn't exclude new housing being delivered for elderly, and people without children (flats, starter homes). If some additional housing was accepted in Sutton Senger it might reduce the overall need for housing which has been identified in the other larger villages where there is considered no housing need. The village of Yatton Keynell which has no evidence of identified housing need (this is minuted in the Parish Council Meeting minutes of November 2014 [see attached document]), and no Neighbourhood plan, has been identified for having a significant proportion of the 138 dwellings needed to meet the Chippenham Area Strategic housing target. The housing sites selection process is contrary to Para 159 of the NPPF. It states: 'Local planning authorities should have a clear understanding of housing needs in their area. They should: -prepare a strategic Housing Market Assessment to assess their full housing needs andTheStrategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which addresses</p>				

	<p>the need for all types of housing, including affordable housing and the needs of different groups in the community such as but not limited to families with children, older people, people with disabilities, service families and people wishing to build their own homes...';</p> <p>Another factor, which was not considered as part of the site selection, was the landscape constraints in place for the village of Yatton Keynell. A significant amount of Yatton Keynell settlement and adjoining land is washed over by AONB rendering a large area of land that is not available for development . This fact should have been identified as a constraint in the overall site selection process and taken into account when considering the amount of new development proposed in the village .</p> <p>Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.</p>
Attached files (Please see Objective)	4727027
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I would be happy to speak if the inspector considers it necessary.

Comment ID:	2122	Consultee Mr Anthony Hardingham Person ID: 1131760	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2) Absence of a Neighbourhood Plan Of the five large villages within the Chippenham Community Area, Yatton Keynell is the only village without a Neighbourhood Plan. It is acknowledged that delivery of housing supply through a community led Neighbourhood Plan offers a positive and proactive approach to delivering housing need rather than a site selection process which is only put forward by landowners. The local Ward Councillor called for a Neighbourhood Plan to be made at a Parish Council meeting back in November 2014 (copy of minutes attached). This was suggested in response to specific concerns that were raised by the community in relation to the proposal for development of land adjacent to Farrells Field. The Parish Council has not addressed this request. In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF, which states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be engaged in a proactive way, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>5) Lack of community engagement and poor consultation The draft plan process is lengthy, complicated and difficult for the public to become engaged with. The planning process, which has taken place and resulted in the Farrells Field site being put forward for housing, has not been meaningful, as it has not provided opportunity for the local community to comment on or consider alternative sites. The Parish Council have not engaged in the plan process or adequately represented the views of the local people in response to the proposal being put forward. I consider the proposed allocation for such a large site, which will have such a significant impact on the community in Yatton Keynell, should be the subject of a more meaningful consultation process by means of a Neighbourhood Plan. It is my understanding (from P61 of the Chippenham Community Area Remainder Topic Paper), that of the five large villages identified as part of the Chippenham remaining area, none of the Parish Council's responded to the Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement . It states in para 2.23: 'Town and parish councils are the most local tier of democratic representation and, as such, they provide a key link with local communities. They are a specific consultation body under the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires that Wiltshire Council has to consult with specific consultation bodies which they consider may have an interest in the subject. Wiltshire Council is committed to continuing to consult with the local councils'. In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF, which states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p>				

	Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.

Comment ID:	2123	Consultee Mr Anthony Hardingham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131760		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		4) Infrastructure issues Drainage is considered to be a fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal, that there are moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and also that the site falls within a groundwater vulnerability area. These issues are identified in the site allocation supporting text, and the need for a capacity appraisal and further assessment is required. Infrastructure needs should be identified and established prior to the allocation of the site. Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.			

Comment ID:	2124	Consultee Mr Anthony Hardingham	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131760	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Another factor, which was not considered as part of the site selection, was the landscape constraints in place for the village of Yatton Keynell. A significant amount of Yatton Keynell settlement and adjoining land is washed over by AONB rendering a large area of land that is not available for development . This fact should have been identified as a constraint in the overall site selection process and taken into account when considering the amount of new development proposed in the village .</p> <p>5) 30 dwellings will have a significant impact on the character of the area</p> <p>Para 5.31 identifies the land East of Farrells Field, Yatton Keynell for the development of approximately 30 dwellings. The Council claims that 'it is in a location that has the capacity to accommodate change from an environmental, heritage and landscape perspective, and could assimilate into the existing built form, whilst positively conserving and enhancing the village-edge setting' . However, a large-scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area.</p> <p>5) Environmental Considerations</p> <p>The land adjacent to Farrells Field is in open countryside outside the current settlement boundary. It has been uncultivated for over 15 years during which time it has become an attractive natural buffer zone separating Yatton Keynell from the two small communities at Tiddlywink and Cold Harbour to the southwest. It is rich in wildlife and mature trees running parallel to the road and alongside Blacksmiths Close which form important natural screening and habitats. The use of the site for the development of 30 houses would result both in the loss of the natural habitat and loss of the screening. It would also adversely impact on the feathering of development at the village boundary. For these environmental and visual impact reasons I consider that this site is not suitable for housing development.</p> <p>Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.				

Comment ID:	2125	Consultee Mr Anthony Hardingham Person ID: 1131760	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5) Environmental Considerations The land adjacent to Farrells Field is in open countryside outside the current settlement boundary. It has been uncultivated for over 15 years during which time it has become an attractive natural buffer zone separating Yatton Keynell from the two small communities at Tiddlywink and Cold Harbour to the southwest. It is rich in wildlife and mature trees running parallel to the road and alongside Blacksmiths Close which form important natural screening and habitats. The use of the site for the development of 30 houses would result both in the loss of the natural habitat and loss of the screening. It would also adversely impact on the feathering of development at the village boundary. For these environmental and visual impact reasons I consider that this site is not suitable for housing development Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Withdraw land at east of Farrell's Field and allow a neighbourhood plan to be prepared, giving local residents the opportunity to explore other site options in a proactive way, in line with NPPF para 15.				

Comment ID:	2126	Consultee H G T Developments Ltd Person ID: 1131752	Agent Miss Louise Steele Associate Director Frampton Person ID: 1131750	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site at Elizabeth Way (SHLAA 263) has been identified for the allocation of 205 dwellings, which is significantly lower than what the site could sustainably deliver. This raises the issue of major under-development of the site which, in combination allocation has not been positively prepared or justified.</p> <p>As stated above the current planning application for the site is for 170 dwellings, the remainder of the allocation is in Barratt Home's control and it is understood from their technical assessments that their site can sustainably accommodate approximately 175 dwellings, in combination this would equate to 355 dwellings.</p> <p>This allocation is generally supported by HGT Developments LL, however, in order to make the plan sound, the allocation for the land at Elizabeth Way should be increased significantly to properly reflect the true capacity of the site. This will ensure the most efficient use of the site and will ensure that the proposed allocation is positively prepared, effective, justified and consistent with National Policy. [for representation in full see attached]</p> <p>In summary the continued allocation of the site will:</p> <ul style="list-style-type: none"> result in a deliverable residential development (to assist in meeting the Council's housing targets) in a sustainable location resulting in efficient use of the site; the provision of a range and mix of dwellings to meet housing needs, allowing provision of a balanced a mixed community. A wide range of high quality and well designed housing will contribute to existing communities and enhance local facilities; assist the District's housing need, including a diversity of housing stock for both market and affordable housing; achieve development in a sustainable location, with easy access to pedestrian routes, local facilities and amenities and close to public transport including bus routes; assist in the vitality and viability of small businesses and services within the settlement; deliver public open space; enhance the ecology of the site including an increase in tree planting, the ecological enhancements will support a range of species, in particular bats, birds and invertebrates; retain and enhance existing vegetation on the site; a substantial area of open space, creating a green network through the site, including a Local Equipped Play Areas (LEAP) and a Local Play Area (LAP) and areas of ecological enhancement are proposed; the public footpaths shall be improved on site to improve existing permeability; and <p>benefits as set out in the draft S106 heads of terms include contributions to local social infrastructure, such as; education, leisure and green infrastructure and affordable housing</p>				

Attached files (Please see Objective)	4727014 / 4727015 / 4727016 / 4727017
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Because the issues raised are complex and there is public interest in the site to ensure that our representations can be expanded upon if necessary and to fully explain why we feel the current plan is unsound.

Comment ID:	2127	Consultee Liz Robertson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131826		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Planning was granted for 10 houses on original barn footprint from initial application of 29 houses with huge opposition then. 10 houses invariably means 20 cars until you add in a teenager therefore 30 cars and so on. Total of 50 houses equals 100 cars plus a teenager per house 150 and so it goes on. Tetbury Lane is a lane and barely wide enough for 2 cars never mind anyone walking along. It is not a dual carriageway. Before long cars from the current site will be parking on the side of the road. Traffic on Tetbury Lane has increased significantly in the last 20 years and a lot of vehicles exceed the 30mph limit. It is no longer painted on the road as you come from Chedglow at the Rommel Lane junction. Street lights appear not to convey this message.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2128	Consultee Liz Robertson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131826		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell primary school is oversubscribed. Building on the playing fields would be criminal for the health of the children. They need open spaces to run around and it is a joy to hear them playing out there. Take that away and lack of exercise will potentially lead to more obese children. The developer won't fund the NHS to cover those costs.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2129	Consultee Ms Sarah Nash	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135876		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Figure 5.19 H3.1 Netherhampton Road</p> <p>I write to object most strongly to the proposed development of 650 houses on Netherhampton Road, Salisbury.</p> <p>I object on the grounds that it is not sound and not effective.</p> <p>I am a regular user of the A3094, firstly to take and fetch children to and from Harnham Schools, and secondly to get myself to work. It is already almost impossible to achieve this in a sensible time because of the sheer volume of traffic using Harnham Gyratory and the A3094. The proposal to add approximately another 100 cars on this bottleneck is ineffective. It will not be possible to widen the approach to the Harnham Gyratory without major disruption to local residents and homes. The newly built cycle lane will have to be abandoned.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2130	Consultee Liz Robertson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131826		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Flooding is another huge concern and with global warming and unpredictable weather patterns this will inevitably increase. Drains cannot cope. Field water already runs towards The Ridgeway. More houses more surface water running that way because of all the concrete/tarmac. Sewer on Tetbury Lane is small and will not cope with more houses. Is the developer going to fund the enlarging of the sewers and surface water? The existing pipe work for the sewer heading to Hankerton cannot cope as it is and overflows out of the manholes. Not very nice for those who live near this. 10 houses will be too many never mind another 40. It's all very well the relevant bodies saying it's ok. They don't live here just like the developer. They disappear into the sunset when there's a problem and have no money to spend on the problem.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2131	Consultee Liz Robertson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131826	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are 2 hotels and 2 pubs. Not an enormous amount of employment opportunities. There is no shop. All shopping trips done by car. Bus timetables are not necessarily at convenient times. A429 is much busier than its ever been and you are lucky to be able to get on to it without a long wait. Houses should be built where there is a more realistic chance of people walking to work, school or shops. There is no pavement to walk to Malmesbury, Tetbury or Cirencester which in reality are too far.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2132	Consultee Liz Robertson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131826	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The current development of 10 houses is more than enough for Crudwell. There is now a current application for a 4 bedroom house on Tuners Lane. If as we have been told there is enough extra housing in Malmesbury and the rest of north and west Wiltshire so please leave Crudwell alone. It's a lovely little village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2133	Consultee Stephen Challis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131832		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my concerns and object to the proposal to the allocation of housing site 482 next to Farrells Field in Yatton Keynell for 30 houses.</p> <p>I live on the edge of Yatton Keynell and have seen the village grow over the years, I appreciate that there is a need for housing in the county, but I strongly feel that a development of 30 houses in the proposed location would have a negative effect on the village and its residence.</p> <p>I find it strange that there is still no Neighbourhood Plan for the area, therefore it has not been proved that there is a lack of housing in Yatton Keynell. Surely any proposed development plans should be based on the results of a survey to identify where there is a need for housing.</p> <p>I feel that adding 30 houses to the entrance of the village will have a negative effect on the character of the village. The road through the village is very busy and increasing the traffic in that area would affect everyone in the village. All of the developments in the village over recent years have been small scale and fitted in well to the village. I would suggest that after completing a neighbourhood plan to identify if there is a need for housing in the village, smaller scale developments would be the more appropriate way forward.</p> <p>I would urge Wiltshire Council to withdraw the allocation of land at Farrells Field and start the process of producing a neighbourhood plan so that the whole village can have a say on how our village moves forward to accommodate any particular housing needs.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2134	Consultee Celestine Bramley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131833	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to raise my concerns regarding the proposed allocation of an additional 40 dwellings Ridgeway Farm in Crudwell in the Wiltshire Council Draft Site Allocations Plan.</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell.</p> <p>In conclusion, I accept that there is a national need for development to address housing requirements however, any further allocation of sites for more housing should take into account the legitimate and real concerns felt by the local community, as well as full and careful consideration of the options available and any applicable environmental and infrastructure constraints.</p> <p>I ask that the Ridgeway Farm site (as an allocation of 40 houses) be removed from the Wiltshire Council Draft Site Allocations Plan whilst we complete our Neighbourhood Plan as this would convey the views of the village in respect of the scale and location of any development going forward.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2135	Consultee Celestine Bramley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131833		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses in Crudwell have experienced SEVERE FLOODING (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development. The WATER SUPPLY to residents living in the outer reaches of Crudwell suffers from poor pressure and flow, with supply frequently reduced to a trickle in the summer months. It is a concern that additional housing may reduce supply to such an extent that some villagers could be without mains supply.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2136	Consultee Celestine Bramley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131833	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	CRUDWELL PRIMARY SCHOOL IS ALREADY GREATLY OVER-SUBSCRIBED, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields. The school's ability to expand is not guaranteed. The village struggles to support an ENVIRONMENT that can be used by everyone, regardless of age, gender or disability. Additional housing will place more pressure on an already inadequate infrastructure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2137	Consultee Celestine Bramley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131833		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am concerned about safety and the INCREASED TRAFFIC FLOWS THAT WILL ARISE ON TETBURY LANE, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village. Furthermore, Tetbury Lane functions as a single track road with limited areas for overtaking. There have been at least two dogs killed on the lane in the last 5 years and cyclists hurt.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2138	Consultee Celestine Bramley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131833		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I hope the council will consider the effects of a further 40 houses on the POWER SUPPLY to the local area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2139	Consultee Celestine Bramley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131833		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	The POTENTIAL FOR EMPLOYMENT in the village is low, without employment opportunities a further 40 houses is likely to contribute net-out commuting.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2140	Consultee Celestine Bramley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131833		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Demand for PROPERTY TYPE (e.g. bungalow, 2 bedroom, affordable housing, etc) should be identified prior to any planning consent.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2141	Consultee Celestine Bramley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131833		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Additional housing poses potential negative effects on the RURAL ENVIRONMENT. These need to be identified and taken into consideration prior to any planning consent.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2142	Consultee Mrs Susan Buxton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131855	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I understand that you are legally bound to plan for the numbers of houses to be built over the next 5/10 years in Wiltshire, as directed by the Government. It is good that you say that you are also trying to fit in with existing Neighbourhood Plans, and realise that extra infrastructure will be needed to alleviate the extra pressure on local communities, which will inevitably happen when large numbers of extra houses are built. However the type of housing that you are planning for is not mentioned. There have been a considerable number of houses built in Devizes recently, and it seems to me that many of them have been bought by newly retired people coming to Devizes, as it is an attractive town to live in, and quite often it means that they are able to buy the sort of accommodation they need, much more cheaply than the area they come from. I know that you are unable to change this, and I do not begrudge them being able to do this-----BUT There are many people in Wiltshire, who cannot afford to buy their own home, and are renting their homes: from private landlords, housing associations, or if they are lucky, from you Wiltshire Council. From your website, I understand that there are currently 2,200 households waiting for suitable housing on the Homes for Wiltshire Register. And that 4,200 new applications are received each year.</p> <p>I urge you therefore to do all in your power to make sure that a large part of this extra housing, is for rented accommodation, and preferably rented Council Accommodation.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2143	Consultee Mr Gavin Rudgley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131734		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Inadequate Use of Brown Sites within Existing Town Boundary There is no consideration of regeneration of existing unused land within the town (brown field sites). The Wiltshire Housing Site Allocations Plan is about Wiltshire. There is a strong bias towards allocating a very significant proportion to Trowbridge (6,810 homes by 2026). The Trowbridge Area proposals are generally at the extremities of the town requiring boundary changes and bringing into question a re-assessment of the Green Belt (para 4.58 of PSCONS01). The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents. It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.</p>				

Comment ID:	2144	Consultee Mr Gavin Rudgley Person ID: 1131734	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2. Failure to Consider Impact on Countryside</p> <p>Due consideration has not been taken on the adverse impact of allocations associated with H2.4, H2.5 and H2.6 to the open countryside. The Southwick Country Park was established in the mid-90s to provide 100 acres for recreational use and for wildlife. The Wiltshire Council website states: "This is a popular place for walking and it provides good opportunities for bird watching. The network of hedges, scrub and ditches offers both food and habitat for a wide variety of wildlife. Keep your eyes open for: woodpeckers searching for insects or buzzards soaring above the park, water voles and tadpoles swimming in the waters, or rabbits and the occasional deer grazing on the grass." Furthermore, the area around Church Land has a significant presence of bats (presumably nesting in or around St Johns Church). Any development between Church Lane and Southwick Country Park (H2.4 Church Lane/ site 1021) and close to the country park (H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565) will have a significant detrimental impact on the Southwick Country Park and adjacent natural habitat.</p> <p>It is worthy of note that on 28 July, Wiltshire Council rejected an application to build 100 homes near Blind Lane in Southwick; "The application was refused on the advice of the council case officer because it was outside of Southwick's boundary, it was too big for the village's facilities to cope with, and it would have taken up open countryside." (Wiltshire Times).</p> <p>The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents.</p> <p>It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.</p>				

Comment ID:	2145	Consultee Mr Gavin Rudgley Person ID: 1131734	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.5 Upper Studley			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2. Failure to Consider Impact on Countryside</p> <p>Due consideration has not been taken on the adverse impact of allocations associated with H2.4, H2.5 and H2.6 to the open countryside. The Southwick Country Park was established in the mid-90s to provide 100 acres for recreational use and for wildlife. The Wiltshire Council website states: "This is a popular place for walking and it provides good opportunities for bird watching. The network of hedges, scrub and ditches offers both food and habitat for a wide variety of wildlife. Keep your eyes open for: woodpeckers searching for insects or buzzards soaring above the park, water voles and tadpoles swimming in the waters, or rabbits and the occasional deer grazing on the grass." Furthermore, the area around Church Lane has a significant presence of bats (presumably nesting in or around St Johns Church). Any development between Church Lane and Southwick Country Park (H2.4 Church Lane/ site 1021) and close to the country park (H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565) will have a significant detrimental impact on the Southwick Country Park and adjacent natural habitat.</p> <p>It is worthy of note that on 28 July, Wiltshire Council rejected an application to build 100 homes near Blind Lane in Southwick; "The application was refused on the advice of the council case officer because it was outside of Southwick's boundary, it was too big for the village's facilities to cope with, and it would have taken up open countryside." (Wiltshire Times).</p> <p>The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents.</p> <p>It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.</p>				

Comment ID:	2146	Consultee Mr Gavin Rudgley Person ID: 1131734	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2. Failure to Consider Impact on Countryside Due consideration has not been taken on the adverse impact of allocations associated with H2.4, H2.5 and H2.6 to the open countryside. The Southwick Country Park was established in the mid-90s to provide 100 acres for recreational use and for wildlife. The Wiltshire Council website states: "This is a popular place for walking and it provides good opportunities for bird watching. The network of hedges, scrub and ditches offers both food and habitat for a wide variety of wildlife. Keep your eyes open for: woodpeckers searching for insects or buzzards soaring above the park, water voles and tadpoles swimming in the waters, or rabbits and the occasional deer grazing on the grass." Furthermore, the area around Church Lane has a significant presence of bats (presumably nesting in or around St Johns Church). Any development between Church Lane and Southwick Country Park (H2.4 Church Lane/ site 1021) and close to the country park (H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565) will have a significant detrimental impact on the Southwick Country Park and adjacent natural habitat. It is worthy of note that on 28 July, Wiltshire Council rejected an application to build 100 homes near Blind Lane in Southwick; "The application was refused on the advice of the council case officer because it was outside of Southwick's boundary, it was too big for the village's facilities to cope with, and it would have taken up open countryside." (Wiltshire Times). The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents. It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.</p>				

Comment ID:	2147	Consultee Mr Gavin Rudgley Person ID: 1131734	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. Loss of Area Identity The area around Church Lane has an identity embodied in St John's Church, the adjacent list school houses, other listed properties and countryside around Southwick Court and the Southwick Country Park which would be lost if developments under H2.4, H2.5 and H2.6 were to proceed. Aside from the identity of Southwick, the area around Church Lane is steeped in history. Aside from St John's Church, the old school houses and other buildings carried listed status. Wiltshire Council should be celebrating this history and identity, not burying it amidst a new development. Furthermore, the approach to Trowbridge from Southwick along the A361 offers a commanding view of the edge of town as the road sweeps down and around the entrance to the Southwick Country Park. The view to the right across the fields to Southwick Court and the parkland surrounding it as you pass the row of old cottages on the left is a visible reminder of Trowbridge's character and legacy and must be preserved. The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents. It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.				

Comment ID:	2148	Consultee Mr Gavin Rudgley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131734		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3. Loss of Area Identity The area around Church Lane has an identity embodied in St John's Church, the adjacent list school houses, other listed properties and countryside around Southwick Court and the Southwick Country Park which would be lost if developments under H2.4, H2.5 and H2.6 were to proceed. Aside from the identity of Southwick, the area around Church Lane is steeped in history. Aside from St John's Church, the old school houses and other buildings carried listed status. Wiltshire Council should be celebrating this history and identity, not burying it amidst a new development. Furthermore, the approach to Trowbridge from Southwick along the A361 offers a commanding view of the edge of town as the road sweeps down and around the entrance to the Southwick Country Park. The view to the right across the fields to Southwick Court and the parkland surrounding it as you pass the row of old cottages on the left is a visible reminder of Trowbridge's character and legacy and must be preserved. The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents. It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.</p>				

Comment ID:	2149	Consultee Mr Gavin Rudgley Person ID: 1131734	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. Loss of Area Identity The area around Church Lane has an identity embodied in St John's Church, the adjacent list school houses, other listed properties and countryside around Southwick Court and the Southwick Country Park which would be lost if developments under H2.4, H2.5 and H2.6 were to proceed. Aside from the identity of Southwick, the area around Church Lane is steeped in history. Aside from St John's Church, the old school houses and other buildings carried listed status. Wiltshire Council should be celebrating this history and identity, not burying it amidst a new development. Furthermore, the approach to Trowbridge from Southwick along the A361 offers a commanding view of the edge of town as the road sweeps down and around the entrance to the Southwick Country Park. The view to the right across the fields to Southwick Court and the parkland surrounding it as you pass the row of old cottages on the left is a visible reminder of Trowbridge's character and legacy and must be preserved. The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents. It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.				

Comment ID:	2150	Consultee Mr Gavin Rudgley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131734		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Community Area Topic Paper for Trowbridge states “it is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick North Bradley and West Ashton, have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities” (PSCONS31, para 2.4). The proposed allocations at H2.4 Church Lane / site 1021, H2.5 Upper Studley / site 3260 and H2.6 Southwick Court / site 3565 are in direct contradiction to this statement. The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents. It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.				

Comment ID:	2151	Consultee Mrs Aaron Wright Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SEE ATTACHED SITE PLAN: ASDA London Rd Site plan</p> <p>The Housing Topic paper indicates that there is a need for greater intervention by the Plan with regard to the South Wiltshire HMA in order to ensure a continuity of land supply</p> <p>An Inspector at a recent appeal decision at Hilltop Way Salisbury (APP/Y3940/W/17/3173509) made the following comment in paragraph 16 of the decision letter:</p> <p>...the fact that the Council cannot demonstrate a 5 year housing land supply, when allowing for 5% buffer would render the adopted plan out of date for the purposes of housing land supply,</p> <p>The Council is obviously in a difficult position maintaining a five year housing land supply in the Southern HMA, as required in government guidance.</p> <p>The Draft Plan allocates 850 dwellings for Salisbury. 640 of these are at Land to the south of Netherhampton Road, between the edge of the existing settlement and the Livestock Market on a greenfield site which has a high degree of visibility. It is noted that the site is proving controversial in the locality because of its size, landscape impacts and the potential adverse highway impacts on the local network.</p> <p>Documents with the draft Plan make some interesting comments:</p> <p>In terms of new housing the Inspector for the Core Strategy emphasised that the 10,420 requirement for South Wiltshire is a minimum. More can be provided.</p> <p>Delays have occurred with housing delivery in the Southern HMA from the strategic sites.</p> <p>Of the three HMAs in Wiltshire, the Council estimate in the Plan that the Southern HMA has the lowest level of supply at 5.4 years.</p> <p>There will continue to be a requirement for additional growth to maintain supply.</p> <p>Beyond 5 years all HMAs' housing supply declines with the Southern HMA the most.</p> <p>Housing requirements in Area Strategies are indicative i.e. more could be provided.</p> <p>Wiltshire has significant housing land supply problems particularly in the Southern HMA. It also has major housing need issues. Whilst it has put forward housing allocations to meet Salisbury's express need, more sites are needed to allow choice, particularly when the Council has decided put 75% of Salisbury's allocation on one controversial site to the south of Netherhampton Road.</p> <p>Allocating the London Road site would promote choice particularly if the large Netherhampton Road site does not proceed or is reduced in size.</p> <p>Having a greater number of sites also assists with delivery by more housing developers rather than have the problems the Council has faced before with strategically large sites being slow to deliver and being in the control of one developer.</p>			
Attached files (Please see Objective)		4727350			
If your representation is seeking a change, do you		To answer any questions from the Inspector and ensure the site is seen in its best light.			

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	2152	Consultee Mrs Aaron Wright Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Whilst there has been no sustainability appraisal of this site it is likely to score well for example: Brownfield The site has an extant consent for retail development which has been implemented. It is accepted by the Council that this site now constitutes brownfield PDL.				
Attached files (Please see Objective)	4727350				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To answer any questions from the Inspector and ensure the site is seen in its best light.				

Comment ID:	2153	Consultee Mrs Aaron Wright Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Biodiversity The site has previously had a non-food retail approval and ecology was not an issue then			
Attached files (Please see Objective)		4727350			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To answer any questions from the Inspector and ensure the site is seen in its best light.			

Comment ID:	2154	Consultee Mrs Aaron Wright Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Water Bearing in mind the location of the site next to recently built housing developments, water supply, flooding and drainage are not expected to be problematical.				
Attached files (Please see Objective)	4727350				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To answer any questions from the Inspector and ensure the site is seen in its best light.				

Comment ID:	2155	Consultee Mrs Aaron Wright Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Air Quality The site is close to Pearce Way and London Road, but so are other neighbouring housing developments. The site is close to bus and cycle routes which help reduce use of the car. Design and planning conditions can help mitigate this issue further.			
Attached files (Please see Objective)		4727350			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To answer any questions from the Inspector and ensure the site is seen in its best light.			

Comment ID:	2156	Consultee Mrs Aaron Wright Planning Manager	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Heritage Whilst Salisbury is rich in heritage assets this site should have little adverse effects.			
Attached files (Please see Objective)		4727350			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To answer any questions from the Inspector and ensure the site is seen in its best light.			

Comment ID:	2157	Consultee Mrs Aaron Wright Planning Manager	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Landscape Landscape impact assessments were undertaken for the original Bishopdown Farm development and subsequent housing developments. It is not anticipated residential development on this site would have adverse impact. It potentially would assimilate better than non-food retail development.				
Attached files (Please see Objective)	4727350				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To answer any questions from the Inspector and ensure the site is seen in its best light.				

Comment ID:	2158	Consultee Mrs Aaron Wright Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Education The site would make the requisite education contributions to primary and secondary education. There are nearby schools at Bishopdown Farm and Laverstock within a short distance.				
Attached files (Please see Objective)	4727350				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To answer any questions from the Inspector and ensure the site is seen in its best light.				

Comment ID:	2159	Consultee Mrs Aaron Wright Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Transport The site would be serviced off the existing roundabout designed to serve Pearce Way and the proposed non-food retail. This is more than adequate to cope with a housing development of approximately 130 dwellings which is the capacity of this site. Cycle routes exist in the vicinity. A number of bus services operate near the site, and there is a frequent service to the city centre from the nearby London Road Park and Ride site.				
Attached files (Please see Objective)	4727350				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To answer any questions from the Inspector and ensure the site is seen in its best light.				

Comment ID:	2160	Consultee Mrs Aaron Wright Planning Manager	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: ASDA London Rd Site plan Economy The development would give a short term boost to the local construction sector and it would provide additional spend in the local economy.				
Attached files (Please see Objective)	4727350				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To answer any questions from the Inspector and ensure the site is seen in its best light.				

Comment ID:	2161	Consultee Mrs Aaron Wright Planning Manager	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1131878	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 Paras: 5.122 – 5.149 Table: 5.4 Land at London Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED SITE PLAN: ASDA London Rd Site plan</p> <p>Other Contributions</p> <p>In addition to education contributions, a site like this can make valuable contributions to affordable and starter homes to address significant housing need in the area. It would also pay it requisite amount of CIL.</p> <p>This site has only recently come into BDW's control and further background planning work has been impossible. At an early date soon however , BDW will engage with planning officers in pre-application discussions and embark on background studies such as Stage 1 Ecology.</p>				
Attached files (Please see Objective)	4727350				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To answer any questions from the Inspector and ensure the site is seen in its best light.				

Comment ID:	2162	Consultee Mr Gavin Rudgley Person ID: 1131734	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	4. Safety There has been no consideration of safety, notably with regard to the history of road traffic accidents on the A361 from Trowbridge to Southwick. The main A361 from Southwick to Trowbridge has a 30mph limit through Southwick, rising to a 40mph limit past Southwick Country Park and then reducing to 30mph at the edge of the Trowbridge Town Boundary. Having lived on the Frome Road near Church Lane for 23 years, we have been witness to numerous road traffic accidents. Even as recently as May 2017 when a vehicle struck a telegraph pole with such impact as to dislodge adjacent poles and tear down telephone lines to many properties. The entrance to Church Lane is a well-known hazard and has been cited on previous planning applications rejected by Wiltshire Council as a reason for not allowing any additional housing on Church Lane. The allocation of housing for the three sites (H2.4, H2.5 and H2.6) would require the addition of a new junction on the Frome Road feeding some 245 houses. Aside from the impact on the countryside and identity of the area, safety of life is not mentioned anywhere in the WHSA or relating documents that I can find. This is unacceptable. The WHSA Plan should be revised to reject the allocation of housing at H2.4 Church Lane/ site 1021, H2.5 Upper Studley/ site 3260 and H2.6 Southwick Court/ site 3565.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The WHSA Plan has a direct impact on the residents of Trowbridge; Wiltshire Council has an obligation to offer a full and open consultation with residents. It is essential that such consultation is well publicised and allows for the constraints on the lives of residents, working or otherwise.				

Comment ID:	2163	Consultee Mrs Julie Baptista Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Meadow View Residents Association Person ID: 1126221		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>As Chair of Meadow View Residents Association I am writing to express the concerns of my members regarding the soundness of the proposals in the Draft Wiltshire Housing Sites Allocation Plan for the site identified as 3260 – Upper Studley (The Site). The members consider this site to be completely unsuitable and unsustainable as a housing development for a variety of reasons outline below.</p> <p>BIODIVERSITY</p> <p>Wiltshire Council has recently produced an updated Wiltshire Housing Site Allocations Plan Pre-submission draft plan Habitat Regulations Assessment (HRA) June 2017. This is now available on the consultation portal. http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap Recommendations on page 76 specifically relate to site 3260 – Upper Studley and state: 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include: Boundary hedgerows / tree lines Lambrook Stream These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. Development will also be required to contribute towards the delivery of the Trowbridge Recreation Management Mitigation Strategy through a financial contribution or direct provision of equivalent new infrastructure over and above normal Council requirements to deliver new habitat and recreational opportunities in line with criteria in the Strategy.' Comments from Natural England on pages 80 and 81 of the HRA state: 'The breeding population of Bechstein's bats in Green Lane Woods is known to be linked to the Bath and Bradford on Avon Bats SAC sites (83). Little is known about the tolerance of this species to difference forms of human disturbance, however NE has raised concerns that it is likely to be sensitive to lighting, noise, habitat fragmentation/degradation and severance of commuting routes and impacts are more likely to occur where the effects are cumulative. Indeed individual and small groups of Bechstein's bats are likely to be particularly vulnerable to disturbance given that natural roost features often tend to include features such as flaking bark and rotten limbs of old trees, which are inherently vulnerable to damage and disturbance. Bats are known to be sensitive to many forms of anthropogenic disturbance, although the exact causal mechanism is currently unknown due to a lack of scientific evidence. Bechstein's are thought to be particularly sensitive as they are very rarely recorded in urban locations.' (83) Bats ringed in Green Lane Woods have been trapped while swarming at Box Mine SSSI</p>			

As little is known about Bechstein's bats tolerance to different forms of human disturbance Wiltshire Council would be advised to approach with extreme caution any proposed development which may impact on the breeding colony at Green Lane / Biss Woods.

The Bechstein's bat, native to the UK, is classified as vulnerable on the IUCN Red List, and is identified as a UK Biodiversity Action Plan Species; this means it is a conservation priority on both a local and national scale. It is also listed on Annex II of the EC Habitats Directive, which requires designation of Special Areas of Conservation (SAC's) to promote important populations. The population in Green Lane / Biss Woods is recognised as the second largest population in Britain.

Further information about Bechstein bats can be found on the Bat Conservation Trust web site:
http://www.bats.org.uk/pages/bechsteins_bat_project.html

'It is unlawful to disturb bats anywhere (roosts, flight lines or foraging areas) in particular if the level of disturbance can be shown to impair their ability to survive, to breed or reproduce, to rear or nurture their young to hibernate or migrate or to affect significantly local distribution.'

Any disturbance to trees on a potential development site is particularly damaging for Bechstein's bats, identified as one of the rarest mammals in Europe, as they are tree dwelling woodland bats. Any mitigation measures, such as planting new trees will not be effective in protecting these bats as Bechstein's prefer old growth broadleaved woodland.

To answer Wiltshire Council's question of soundness in relation to this site and biodiversity:
It is obvious that the HRA used to judge the suitability of site 3260 – Upper Studley was the older document produced in February 2012. If a further HRA were to be undertaken using the guidelines in the Wiltshire Housing Site Allocations Plan Pre-submission draft plan Habitat Regulations Assessment (HRA) June 2017 it is my opinion that this site would be rejected as being less sustainable.

Increased mitigation measures, which will be required to maintain the continuous corridor of native landscaping as roosting and feeding sites for the protected bat population, will seriously reduce the net developable area of The Site. Therefore it seems unlikely that this site could accommodate the 20 dwellings originally indicated in The Plan. If this is the case one must seriously question the economic viability and therefore the soundness of this site for any developer.

Protection for the Bechstein's bats will require any developer to obtain a European Protected Species Licence.

Wiltshire Council is merely moving the issues regarding the Bechstein's bat population from Ashton Park to other areas in Trowbridge which will result in the same planning application chaos which is evident at the moment.

The Site provides a useful habitat for deer, rabbits, voles and a host of birds. In addition the ancient woodland, which surrounds The Site on 3 sides, contributes to the continuous corridor of native landscaping in this area of Trowbridge. It provides in particular, roosting and foraging sites for the rare and endangered Bechstein's bats and other protected bats from the colony nesting in Green Lane / Biss Woods.

To answer Wiltshire Council's question of soundness in relation to this site and sustainability:
It is illegal (enforceable by fines and/or up to 6 months in prison) to cut down or damage any tree known to be used by Bechstein's bats for nesting, roosting or foraging. The section of The Site adjoining the Frome Road, with the exception of a small gateway, is completely lined with ancient woodland. It is not clear in The Plan how suitable visibility would be established for any access/egress point nor if any road requirement would be single lane.

It is clear to me and other members of Meadow View Residents Association that the amount of mitigation measures required on this small site to provide full protection for the rare Bechstein's bats, plus other bats living and breeding in Green Lane / Biss Woods, which use this site for regular night time foraging and feeding would further reduce the allocated number of houses and therefore render it uneconomically viable for any developer.

The Plan appears to be indicative of a council which takes little or no regard to the natural habitat and wildlife in the area and is unwilling or unable to stand up to greedy land owners and powerful housing developers resulting in a planning department in chaos.

I would recommend Wiltshire Council to remove site 3260 – Upper Studley from the Wiltshire Housing Site Allocations Plan thereby saving and protecting for future generations the important biodiversity associated with this site.

I would appreciate being kept informed (addressed at the beginning of this letter) that:
The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination;
The Inspector's Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and
That Wiltshire Housing Site Allocations Plan has been adopted.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To ensure that all points raised in the letter are considered.

Comment ID:	2164	Consultee Mrs Julie Baptista Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Meadow View Residents Association Person ID: 1126221		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>As Chair of Meadow View Residents Association I am writing to express the concerns of my members regarding the soundness of the proposals in the Draft Wiltshire Housing Sites Allocation Plan for the site identified as 3260 – Upper Studley (The Site). The members consider this site to be completely unsuitable and unsustainable as a housing development for a variety of reasons outline below.</p> <p>Water Land in Upper Studley which borders Lambrok Stream is very low lying, clay based soil, and suffers serious flooding during the winter months. When searching GOV.UK Flood map for planning tool: https://flood-map-for-planning.service.gov.uk/summary/384252/156096 It clearly states parts of this land is identified as flood zone 3 – land and property in flood zone 3 have a high probability of flooding. To answer Wiltshire Council's question of soundness in relation to this site and water: It is unclear, from The Plan, the extent of mitigation which might be required to offset this risk nor to what extent this would reduce the net developable area. However it should be noted that any development on this site will have an increased risk of flooding. It is clear to me and other members of Meadow View Residents Association that the amount of mitigation measures required on this small site to fully account for flooding risk I would appreciate being kept informed (address at the beginning of this letter) that: The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination; The Inspector's Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and That Wiltshire Housing Site Allocations Plan has been adopted.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure that all points raised in the letter are considered.			

Comment ID:	2165	Consultee Mrs Julie Baptista Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Meadow View Residents Association Person ID: 1126221		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		As Chair of Meadow View Residents Association I am writing to express the concerns of my members regarding the soundness of the proposals in the Draft Wiltshire Housing Sites Allocation Plan for the site identified as 3260 – Upper Studley (The Site). The members consider this site to be completely unsuitable and unsustainable as a housing development for a variety of reasons outline below. Landscape The Plan identifies The Site as, ‘rolling water meadow associated with Lambrok Stream and Southwick Country Park.’ I would appreciate being kept informed (address at the beginning of this letter) that: The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination; The Inspector’s Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and That Wiltshire Housing Site Allocations Plan has been adopted.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure that all points raised in the letter are considered.			

Comment ID:	2166	Consultee Mrs Julie Baptista Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Meadow View Residents Association Person ID: 1126221		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>As Chair of Meadow View Residents Association I am writing to express the concerns of my members regarding the soundness of the proposals in the Draft Wiltshire Housing Sites Allocation Plan for the site identified as 3260 – Upper Studley (The Site). The members consider this site to be completely unsuitable and unsustainable as a housing development for a variety of reasons outline below. It is well known that the fields in the vicinity of Church Lane and Oldbrick Fields provide far reaching views across the local countryside. They provide the setting for at six listed buildings, as well as the archaeological site of an ancient water meadow. These need to be protected for the benefit and enjoyment of future generations as stated in the National Planning Framework and Wiltshire Council Core Strategy https://www.gov.uk/government/publications/national-planning-policy-framework--2 http://www.wiltshire.gov.uk/planninganddevelopment/planningpolicy/wiltshirecorestrategy.htm I would appreciate being kept informed (address at the beginning of this letter) that: The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination; The Inspector’s Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and That Wiltshire Housing Site Allocations Plan has been adopted.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure that all points raised in the letter are considered.			

Comment ID:	2167	Consultee Mrs Julie Baptista Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Meadow View Residents Association Person ID: 1126221		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
		<p>As Chair of Meadow View Residents Association I am writing to express the concerns of my members regarding the soundness of the proposals in the Draft Wiltshire Housing Sites Allocation Plan for the site identified as 3260 – Upper Studley (The Site). The members consider this site to be completely unsuitable and unsustainable as a housing development for a variety of reasons outline below. In The Plan Wiltshire Council appears to completely ignore the number of homes which can easily be delivered from brown field site in Trowbridge. On 5th September 2017 Trowbridge Town Council Policy and Resources Committee met to discuss The Housing Sites Allocation Plan. In the minutes, see link below, there is substantial evidence to show The Plan is not sound with regard to landscaping and the identification of sustainable</p> <p>http://www.trowbridge.gov.uk/wp-content/uploads/2017/06/170905-Policy-Resources-Minutes-Unapproved.pdf</p> <p>On page 11 of the minutes TTC lists the brown fields sites available in Trowbridge along with the number of houses which could be delivered on these sites by 2026 with minimal risk.</p> <p>'11. RESOLVED that Trowbridge Town Council supports the inclusion of specifically identified sites, which as such are not defined by the NPPF as Windfalls and are located within the Trowbridge Settlement Boundary:</p> <p>Former District Council Offices, Bradley Road - 70 dwellings East Wing/Trowbridge Hospital/Margaret Stancomb School - 300 dwellings Bowyers - 250 dwellings Ashton Street Centre - 70 dwellings The Pavillions, White Horse Business Park - 130 dwellings'</p> <p>This equates to total of 820 additional dwellings, easily deliverable within the time scale of The Plan, on brown field sites in Trowbridge. These potential dwellings would all be situated within Trowbridge Town Council's suggested 2 km sustainable travel distance and therefore supported by Trowbridge Town Council. Further details from Trowbridge Town Council Strategy 2017 – 2021 are mentioned below under the heading Accessibility and Sustainability.</p> <p>To answer Wiltshire Council's question of soundness in relation to this site and landscape: Wiltshire Council's Core Strategy supports the use of brown fields sites before identification of irreplaceable green field land. In The Plan Wiltshire Council appears to completely ignore the number of new dwellings which can easily be delivered from brown field site in Trowbridge. Trowbridge Town Council has identified a number of potential brown field sites which could accommodate up to 820 new dwellings in Trowbridge therefore reducing the need to identify additional green field sites.</p> <p>I would appreciate being kept informed (address at the beginning of this letter) that: The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination;</p>			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.					

	The Inspector's Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and That Wiltshire Housing Site Allocations Plan has been adopted.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To ensure that all points raised in the letter are considered.

Comment ID:	2168	Consultee Mrs Julie Baptista Chair Meadow View Residents Association	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126221		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
		<p>As Chair of Meadow View Residents Association I am writing to express the concerns of my members regarding the soundness of the proposals in the Draft Wiltshire Housing Sites Allocation Plan for the site identified as 3260 – Upper Studley (The Site). The members consider this site to be completely unsuitable and unsustainable as a housing development for a variety of reasons outline below.</p> <p>Education Wiltshire Council’s Core Policy 29 clearly identifies the urgent need for additional primary school provision in Trowbridge and states this has now reached critical levels. New schools on the Ashton Park development may not be completed within the timescale of the plan. The Plan states that the existing secondary schools in Trowbridge will also reach capacity by 2020 and, in view of the scale of additional committed/planned developments in and around Trowbridge, another secondary school site will need to be identified within the lifetime of The Plan.</p> <p>It would therefore seem unnecessary, at this time, to be identifying additional land for housing in this area which will further increase the pressure on school places. This will impact on Wiltshire Council Education Department who may find it impossible to meet it’s commitments to provide education within a sustainable travel distance especially for those children requiring primary education who, aged between 4 and 11, are too young to travel to school independently.</p> <p>To answer Wiltshire Council’s question of soundness in relation to this site and Education: Any new housing developments in Trowbridge will need to be delayed until the shortfall in school provision, particularly primary education, has been addressed. The Plan states: ‘The site is situated on the edge of the town with access to local/town centre services and facilities achievable through walking, cycling and public transport.’ The Trowbridge Town Council Strategy 2017 – 2021 document under the section – Sustainable Future Growth, suggests a sustainable travel distance of 2 km from the town centre. Unfortunately a link to this document on the Trowbridge Town Council web site is not available at this time, however, in the copy available to me, it states: ‘Town Council should vigorously oppose further extensions to the urban envelope outside the 2 km circle in order to protect the integrity and sustainability of the town.’ Extract from point 2. FUTURE GROWTH clearly states: ‘Proposals which come forward through the Housing Site Allocations Plan will be supported only if they are within the 2 km distance criteria, are designed to integrate well with the town and can support sustainable development of Trowbridge, providing improvements to the environment, communication links and recreational opportunities.’</p>			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.					

	<p>Although not scientifically proven a quick search using google maps and a post code from existing premises in Oldbrick Fields, Trowbridge produced the following results (See attached Appendix 1).</p> <p>It should also be noted that any proposals for new developments further along the A361, Frome Road, would of course, be an increased distance away from the examples of the town centre amenities outlined above.</p> <p>The Council's view that they can justify development on this site on the basis that it provides an accessible, sustainable development is clearly in question and development on this site should not be supported by Trowbridge Town Council.</p> <p>I would appreciate being kept informed (address at the beginning of this letter) that:</p> <p>The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination;</p> <p>The Inspector's Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and</p> <p>That Wiltshire Housing Site Allocations Plan has been adopted.</p>
<p>Attached files (Please see Objective)</p>	<p>4727354</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To ensure that all points raised in the letter are considered.</p>

Comment ID:	2169	Consultee Mrs Julie Baptista Chair	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Meadow View Residents Association Person ID: 1126221		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>As Chair of Meadow View Residents Association I am writing to express the concerns of my members regarding the soundness of the proposals in the Draft Wiltshire Housing Sites Allocation Plan for the site identified as 3260 – Upper Studley (The Site).</p> <p>The members consider this site to be completely unsuitable and unsustainable as a housing development for a variety of reasons outline below.</p> <p>ACCESSIBILITY AND SUSTAINABILITY</p> <p>The A361 is a black spot for accidents both ‘in the dip’ where cars turn into Southwick Country Park as well as in the 30 mph speed limit further up the hill towards Trowbridge town centre. Any additional access/egress points via junctions with the A361, even with tightened speed restrictions, would only make matters worse.</p> <p>To answer Wiltshire Council’s question of soundness in relation to this site and accessibility:</p> <p>Any additional access/egress points via junctions with the A361, even with tightened speed restrictions, would have the potential to increase the number of accidents.</p> <p>I would appreciate being kept informed (address at the beginning of this letter) that:</p> <p>The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination;</p> <p>The Inspector’s Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and</p> <p>That Wiltshire Housing Site Allocations Plan has been adopted.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To ensure that all points raised in the letter are considered.			

Comment ID:	2170	Consultee Mrs Julie Baptista Chair Meadow View Residents Association	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126221		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley		Effective	Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>As Chair of Meadow View Residents Association I am writing to express the concerns of my members regarding the soundness of the proposals in the Draft Wiltshire Housing Sites Allocation Plan for the site identified as 3260 – Upper Studley (The Site). The members consider this site to be completely unsuitable and unsustainable as a housing development for a variety of reasons outline below.</p> <p>FITS WITH AREA STRATEGY</p> <p>It would seem that Wiltshire Council's Core Policy has recently been revised to account for the information outlined in the Wiltshire Housing Site Allocations Plan Pre-submission draft plan Habitat Regulations Assessment (HRA) June 2017. http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap</p> <p>It is unclear to what extent this document has influenced proposals contained in The Plan as I can find no mention of the HRA June 2017 document in the references. It maybe that The Plan was produced at a time before the June 2017 document became available and was therefore based on the much older Habitat Regulations Assessment (HRA) February 2012.</p> <p>The Wiltshire Council Cabinet Report June 2017 – Draft Wiltshire Site Allocations Plan paragraph 20 (i) also refers to a Habitats Regulations Assessment (HRA) but does not specify if this is the February 2012 version or the recently published June 2017 version. However it should be noted that the version now available on the consultation portal clearly states: http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap</p> <p>Extract from Page 77</p> <p>'It is also worth noting that the housing figures for each community area have now been relaxed from 'at least' to 'approximately', therefore if the 950 houses cannot be sustainably delivered at the town there is the option to deliver some of this requirement in surrounding community areas within the wider HMA. Nonetheless it is important that potential effects upon the Bechstein's populations are given due regard and attention throughout the site selection process.</p> <p>While CP29 only sets a strategic target for housing at Trowbridge rather than a specific location, it also now includes a clear requirement for the protection of bats and their habitats to be a key determinant in the allocation of sites through the forthcoming Site Allocations DPD.</p> <p>CP29 of the Wiltshire Core Strategy was also amended to reflect the recommendations and conclusions of the HRA by the inclusion of the following text:</p> <p>An additional 950 dwellings will then be developed at the town once improved secondary school provision is in place towards the end of the plan period and there has been a further assessment of the effects on protected bat species and their habitats to ensure that they are properly safeguarded.'</p> <p>To answer Wiltshire Council's question of soundness in relation to this site and fitting with area strategy:</p> <p>It is unclear when the Core Policy changed, to take account of the information outlined in the new Wiltshire Housing Site Allocations Plan Pre-submission draft plan Habitat Regulations Assessment (HRA) June 2017. http://consult.wiltshire.gov.uk/portal/spatial_planning/sites_dpd/draftwhsap</p>			

	<p>It is also unclear to what extent the HRA June 2017 has influenced proposals contained in The Plan as I can find no mention of the HRA June 2017 document in the references. It maybe that The Plan was produced at a time before the June 2017 document became available and was therefore informed by the much older Habitat Regulations Assessment (HRA) February 2012.</p> <p>The Wiltshire Council Cabinet Report June 2017 – Draft Wiltshire Site Allocations Plan paragraph 20 (i) also refers to a Habitats Regulations Assessment (HRA) but does not specify if this is the February 2012 version or the recently published June 2017 version.</p> <p>SUMMARY</p> <p>It would appear that The Plan is fundamentally unsound as it was clearly developed before the recent changes to Wiltshire’s Core Policy, in relation to housing developments in Trowbridge, and the revised Wiltshire Housing Site Allocations Plan Pre-submission draft plan Habitat Regulations Assessment (HRA) June 2017. If this is this case then the site selection process, as outlined in The Plan, is basically flawed.</p> <p>I would appreciate being kept informed (address at the beginning of this letter) that:</p> <p>The Wiltshire Housing Site Allocations Plan has been submitted to the Secretary of State for independent examination;</p> <p>The Inspector’s Report (including any recommendations) into the Wiltshire Housing Site Allocations Plan has been published; and</p> <p>That Wiltshire Housing Site Allocations Plan has been adopted.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To ensure that all points raised in the letter are considered</p>

Comment ID:	2171	Consultee Jonathan Capper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131894		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Before I start, we need more houses, that much I agree on. The number and location are a separate matter. I am firmly of the belief that an addition 40 houses in Crudwell will impact the infrastructure of the village beyond the pint of no return. This is a ridiculous notion that increasing the numbers of dwellings in this small location won't have bigger implications.</p> <p>Already the internet and phone lines are poor beyond this point and increasing it will only make matters worse.</p> <p>Beyond this it appears madness that other locations in Crudwell parish aren't being investigated to hit those numbers required. I appreciate that we need more properties but let's do it sensibly!! There are locations in Eastcourt that would happily absorb 6 or maybe more properties, One or two in morgans tyning and so on and so forth. This needs more options, more consultations and more time to consider. West Crudwell farm is not the only answer and it shouldn't be taken as perfect as in a lot of people's minds and views it is far from it.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2172	Consultee Gordon MacPherson Person ID: 1131898	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
Do you consider the draft WHSAP is sound?					
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.13				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my concerns about the proposed allocation of an additional 40 houses to the village of Crudwell on the Ridgeway Farm site as detailed in the draft Site Allocations Plan.</p> <p>Sensible planned growth, which is sustainable and does not spoil the character of the village, will receive support generally. In 2014, I was against the Ridgeway Farm planning application for 29 houses when it was submitted to (and rejected by) Wiltshire Council and the principle objections remain:</p> <p>The scale of the development - it was much larger than previous developments in the village.</p> <p>It was outside the designated red line settlement boundary and [Officer note: other issues are contained in separate comments according to their theme]</p> <p>I support the present development of 10 houses on the footprint of the old farm yard as it is certainly better than what was there before, it made good use of an existing "brown field" site and was of a scale consistent with other recent developments in the village.</p> <p>It is concerning to see the allocation of an additional 40 houses on this site which was previously deemed unsuitable.</p> <p>I am also concerned that the site size / boundary of the Ridgeway Farm Development encompasses an area far greater than is required - even for 40 homes - so I question why that is the case and would like it reviewed as mist likely there is a desire by the developer to increase the number of houses which in terms of sustainability makes no sense.</p> <p>As there is no immediate strategic need for any housing allocations at Crudwell, I would much rather see the Neighbourhood Plan group consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward.</p> <p>Policy 1 of the Wiltshire Core Strategy notes that the "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", given that we have circa 250 homes in Crudwell, I do not see how an additional 40 homes on top of the 10 already being built - a staggering 20% increase overall - even falls within Wiltshire Councils own Core strategy.</p> <p>It seems to me that there are clear reasons that the development should remain at ten houses and should not be increased by 40 houses or indeed a larger amount should that be the underlying plan by the developer.</p> <p>This site allocation if allowed to stand would, in my opinion, completely change the character of the village and undo many years sensible and sensitive development supported by the Parish Council and the planning teams at Wiltshire Council. I am not anti-development but I do favour sensible, incremental development.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2173	Consultee Gordon MacPherson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131898		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Its likely impact on the local infrastructure, specifically oversubscription of Crudwell Primary School. As there is no immediate strategic need for any housing allocations at Crudwell, I would much rather see the Neighbourhood Plan group consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2174	Consultee Jonathan Capper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131894		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	The water pressure through Crudwell is poor at the best of times and will only get worse by adding any further properties into the mix!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2175	Consultee Gordon MacPherson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131898	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Its likely impact on the local infrastructure, specifically the impacts on already overburdened drainage and sewerage systems and</p> <p>It is concerning to see the allocation of an additional 40 houses on this site which was previously deemed unsuitable. Crudwell still has severe flooding problems which have not yet been completely addressed, it remains a major concern to people who live in properties around the Swillbrook which runs through the centre of the village. Many have experienced significant damage to their homes in recent years both through surface water and raw sewerage and I believe surface water from the proposed site would only make this situation worse. Many homes, require non-return valves to stay safe from sewerage flooding until the excess over capacity subsides.</p> <p>As there is no immediate strategic need for any housing allocations at Crudwell, I would much rather see the Neighbourhood Plan group consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2176	Consultee Gordon MacPherson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131898	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Sensible planned growth, which is sustainable and does not spoil the character of the village, will receive support generally. In 2014, I was against the Ridgeway Farm planning application for 29 houses when it was submitted to (and rejected by) Wiltshire Council and the principle objections remain:</p> <p>Its likely impact on the local infrastructure, specifically the likely increased traffic on Tetbury Lane;</p> <p>As there is no immediate strategic need for any housing allocations at Crudwell, I would much rather see the Neighbourhood Plan group consult and engage with the local community and businesses to determine the scale and type of housing need in Crudwell; to examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2177	Consultee Mrs Mary Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125482	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have lived on the flood plain in Harnham for 23yrs, close to the River Nadder. I object to the proposal for the Netherhampton Rd housing development H3.1(S1028) and North of Netherhampton Rd H3.3 (S1027) because building 640 plus 100 new homes will add to our flood and drainage problems, the traffic jams we already experience, as well as impairing our wonderful landscape. My objections are covered in 1.12 the strategic Issues being flood and surface water drainage, traffic flows and the Strategic Road Network, and landscape and heritage considerations. Surface water flows and flooding has been improved with the Environment agency flood defence work in 2008, but we continue to have drainage problems when water levels in the River Nadder and ground water levels are high. This has been exacerbated by the small housing development of Buttercup Close, Middle Street, which occurred without improvement to the drains so that these have to be pumped out by a tanker on a regular basis. The S1027 site suffers regularly from surface water logging with heavy rainfall, and I cannot believe that the Environment Agency have been properly consulted and agreed to the proposal for 100 houses there against the principles stated in Wiltshire Core strategy to prevent development on our flood plains. (see Fig 1) If these houses are to be set back from the road so that some views of Salisbury Cathedral Spire are retained they will be closer still to the River Nadder.</p>				
Attached files (Please see Objective)	4727523				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2178	Consultee Charlotte Capper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131905	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to register my concern and opposition to the proposed additional housing allocation at the Ridgeway site where building is currently underway. As a resident on Tetbury road I am already very aware of the heavy traffic flow here and general state of disrepair in the road and believe that an increase in traffic flow, which further housing at ridgeway will undoubtedly bring, would severely impact this road and lead to further deterioration.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2179	Consultee Charlotte Capper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131905		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition I find it extremely disappointing that the council would look to allocate further sites in a village where there is insufficient infrastructure to support this. Crudwell has a fantastic but oversubscribed village school, no shop, only access to doctors surgeries which would require transport to local towns and there is currently a limited schedule of such public transport to crudwell. Who are these houses for? Families who will have nowhere to send their children? Elderly who will have no local facilities to support their daily needs?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2180	Consultee Charlotte Capper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131905		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As has been expressed by the local steering group at all meetings, crudwell is not anti development but it should be given the opportunity to decide when and where and so I believe this allocation should be removed and crudwell should have the opportunity to outline suitable sites and the support needed in the local area to make this viable.</p> <p>As I understand it there will currently be an oversubscription of housing in the local environs and so there is no need to place houses in a village underprepared for such an increase in population levels.</p> <p>I truly hope this allocation will be reconsidered and dropped as swiftly as possible so that Crudwell can stop spending its time fighting such a rash plan and focus on their own local plan which will be constructive, thought out, sustainable and most importantly have local support.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2181	Consultee Richard Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131913	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am concerned with the number of buildings proposed for Trowbridge, especially those on clay soil where water levels are already very high and flood easily. For example-</p> <p>The Southwick Court Site (3565) adjacent to Trowbridge Town Football Club ground.</p> <p>The site between The White Horse Business Park (298) and Woodmarsh.</p> <p>If drains from these two sites feed into the river Biss which in times of heavy rain already overflow into the area (260) it will only make matters worse.</p> <p>In periods of extended heavy rain the foul sewers and the surface water drains at the lower end of Broadly Park, North Bradley overflow, which shows how likely other local areas are to flood.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2182	Consultee Richard Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131913	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am concerned with the number of buildings proposed for Trowbridge, especially those on clay soil where water levels are already very high and flood easily. For example-</p> <p>The Southwick Court Site (3565) adjacent to Trowbridge Town Football Club ground.</p> <p>The site between The White Horse Business Park (298) and Woodmarsh.</p> <p>If drains from these two sites feed into the river Biss which in times of heavy rain already overflow into the area (260) it will only make matters worse.</p> <p>In periods of extended heavy rain the foul sewers and the surface water drains at the lower end of Broadly Park, North Bradley overflow, which shows how likely other local areas are to flood.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2183	Consultee Richard Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131913	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note from the Wiltshire Plan Map that of all the separate areas in the plan, Trowbridge is the smallest and yet it is required to have the highest number of new houses.</p> <p>I appreciate that Trowbridge will need to accommodate more houses but believe that those that have already been passed by planning are sufficient for a town of this size.</p> <p>In view of the size of Wiltshire I believe that other areas could accommodate a greater proportion of houses than proposed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2184	Consultee Richard Pearce	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131913	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is already considerable traffic congestion and schools are at capacity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2185	Consultee Simon Thomson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131914		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my opposition to the proposed development of a further 40 houses off Tetbury Lane in Crudwell. I am in favour of proportionate development within the village as I believe it brings in new people, especially families and adds to the vibrant life of the village. The ten houses currently being built fits this criteria but a further 40 is a disproportionate increase to the current 240 houses in Crudwell. This would put too much pressure on the school, drainage and traffic in the village. The village is now in the process of producing a Neighbourhood Plan that will set out criteria and areas for proportionate development in the village. It would be reasonable to delay any planning approval until the local people have set out their views.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2186	Consultee Mr Anthony Hemmings	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131985	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.38			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>By granting consent for the air ambulance helicopter station the need for a buffer area between the land at 541 Outmarsh has been removed. The revised boundary should be shown on the phy boundary between 541 and the air ambulance property. Grid Reference 1K [Semington map] Settlement boundary to be moved to southern side of former railway embankment, i.e. between 541 Outmarsh and the air ambulance property.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Because the boundary change is important and I would like to make it clear to an inspector.				

Comment ID:	2187	Consultee Mrs N Cartwright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131925		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing as a resident of Crudwell to voice my concerns regarding the above. The main issues for me are around the increased traffic on an already very busy small lane and the ensuing safety and environmental effects this will have.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2188	Consultee Mrs Mary Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125482	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Traffic on the Netherhampton Rd approach to the Harnham Gyrotory has increased hugely in 23yrs and is often gridlocked at peak times, and on market Tuesday when the livestock market on the road is operational, and during Salisbury races. Additional cars from new homes will add to this morning and evening as people head to work most of which is to the north of the City. Salisbury Transport Strategy has not delivered a solution to these problems to date and review and consultation with the Highways Agency must surely happen BEFORE hundreds of new homes add to the traffic on the road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2189	Consultee Mrs Mary Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125482		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thirdly, there are wonderful views of Salisbury Cathedral from the South West approach to Salisbury and its downland landscape which will be lost with the developments on S1027 and S1028. Your planning proposals state that there will be 'highly adverse impact on the landscape and highly important views', and 'the chances of mitigating these are low'. Surely this cannot be acceptable to either Natural England or to Historic England if they have been properly consulted?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2190	Consultee Mrs Mary Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125482	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thirdly, there are wonderful views of Salisbury Cathedral from the South West approach to Salisbury and its downland landscape which will be lost with the developments on S1027 and S1028. Your planning proposals state that there will be 'highly adverse impact on the landscape and highly important views', and 'the chances of mitigating these are low'. Surely this cannot be acceptable to either Natural England or to Historic England if they have been properly consulted?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2191	Consultee Mrs Mary Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125482	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have lived on the flood plain in Harnham for 23yrs, close to the River Nadder. I object to the proposal for the Netherhampton Rd housing development H3.1(S1028) and North of Netherhampton Rd H3.3 (S1027) because building 640 plus 100 new homes will add to our flood and drainage problems, the traffic jams we already experience, as well as impairing our wonderful landscape. My objections are covered in 1.12 the strategic Issues being flood and surface water drainage, traffic flows and the Strategic Road Network, and landscape and heritage considerations. Surface water flows and flooding has been improved with the Environment agency flood defence work in 2008, but we continue to have drainage problems when water levels in the River Nadder and ground water levels are high. This has been exacerbated by the small housing development of Buttercup Close, Middle Street, which occurred without improvement to the drains so that these have to be pumped out by a tanker on a regular basis. The S1027 site suffers regularly from surface water logging with heavy rainfall, and I cannot believe that the Environment Agency have been properly consulted and agreed to the proposal for 100 houses there against the principles stated in Wiltshire Core strategy to prevent development on our flood plains. (see Fig 1) If these houses are to be set back from the road so that some views of Salisbury Cathedral Spire are retained they will be closer still to the River Nadder.</p>				
Attached files (Please see Objective)	4727523				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2192	Consultee Mrs Mary Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125482	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Traffic on the Netherhampton Rd approach to the Harnham Gyrotory has increased hugely in 23yrs and is often gridlocked at peak times, and on market Tuesday when the livestock market on the road is operational, and during Salisbury races. Additional cars from new homes will add to this morning and evening as people head to work most of which is to the north of the City. Salisbury Transport Strategy has not delivered a solution to these problems to date and review and consultation with the Highways Agency must surely happen BEFORE hundreds of new homes add to the traffic on the road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2193	Consultee Mrs Mary Pelton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125482		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thirdly, there are wonderful views of Salisbury Cathedral from the South West approach to Salisbury and its downland landscape which will be lost with the developments on S1027 and S1028. Your planning proposals state that there will be 'highly adverse impact on the landscape and highly important views', and 'the chances of mitigating these are low'. Surely this cannot be acceptable to either Natural England or to Historic England if they have been properly consulted?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2194	Consultee Mrs N Cartwright	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131925	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Also how can the increased number of children be catered for in an already over-subscribed village school ? I am not against development but would ask that it be proportional and enhance the village rather than destroy somewhere that my family have loved living in for the past 16 years.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2195	Consultee Mrs Mary Pelton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125482	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thirdly, there are wonderful views of Salisbury Cathedral from the South West approach to Salisbury and its downland landscape which will be lost with the developments on S1027 and S1028. Your planning proposals state that there will be 'highly adverse impact on the landscape and highly important views', and 'the chances of mitigating these are low'. Surely this cannot be acceptable to either Natural England or to Historic England if they have been properly consulted?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2196	Consultee Mrs Emma Morse Person ID: 1126189	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to inform you of my objections to Wiltshire Councils Proposed Development Site at Southwick Court - 3565. Wiltshire Council are not complying with their core strategy, a document which clearly states that developments should not be built where villages are swallowed up by towns. Boundary Walk in Trowbridge forms the parish boundary that divides Trowbridge from Southwick. Development of this site would contradict the core strategy.</p> <p>As a resident of North Bradley I am concerned that the proposed plan would serve to develop land that for centuries has formed a natural boundary separating the town of Trowbridge from its outlying villages. Land that has been used by generations of farmers to provide an income and enjoyed by local residents who, have used the land for numerous leisure activities.</p> <p>In conclusion, the proposed development at site 3565 would contradict Wiltshire's Core Strategy. Brownfield sites such as the old Bowyers area must be developed and Greenfield areas must be preserved.</p> <p>Thank you for considering my objections to site 3565.</p> <p>Remove site 3565 from Proposal</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2197	Consultee Mrs Emma Morse	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126189		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to inform you of my objections to Wiltshire Councils Proposed Development Site at Southwick Court - 3565. Development of site 3565 would necessitate building on a floodplain Thank you for considering my objections to site 3565. Remove site 3565 from Proposal				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2198	Consultee Mrs Emma Morse	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126189		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I am writing to inform you of my objections to Wiltshire Councils Proposed Development Site at Southwick Court - 3565. Development of site 3565 would necessitate breaking through a preserved medieval hedgerow. The site contains medieval earthworks and fishponds and the Grade II* Southwick Court Farm, historical features that must be preserved in their entirety for future generations. Remove site 3565 from Proposal			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2199	Consultee Mrs Emma Morse	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126189		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to inform you of my objections to Wiltshire Councils Proposed Development Site at Southwick Court - 3565. As a parent, I am concerned about the lack of infrastructure detailed in the proposed plan. Primary schools are struggling to meet current demand. The development of site 3565 would further exacerbate what is already deemed by Clare Medland, Wiltshire Council's head of school place commissioning, a primary school crisis. In an article ran by The Wiltshire Times 14.07.2017 she stated that the two primary schools due to be built in Ashton Park would not be enough to meet the needs of the town. 'If hundreds of houses are built then the situation will become critical. Primary schools in the Trowbridge area are already tight. If all these applications are approved it would create a real problem.'</p> <p>In conclusion, the proposed development at site 3565 would placing additional pressure on an infrastructure that is not fit for purpose. Health and safety issues in the local area have not been taken into consideration. A lack of healthcare facilities, school placements would have a negative impact on the local community.</p> <p>Thank you for considering my objections to site 3565.</p> <p>Remove site 3565 from Proposal</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2200	Consultee Mrs Emma Morse Person ID: 1126189	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to inform you of my objections to Wiltshire Councils Proposed Development Site at Southwick Court - 3565. Parking at and in close proximity to The Grove Primary School has been significantly restricted since the commencement of the new academic year 2017/2018, following the adoption of double yellow lines along Hazel Grove by the council. Staff employed by the school, are now forced to park their vehicles along Silver Street Lane as there are a limited and insufficient number of spaces on the school site. The situation is further exacerbated at the start and end of the school day by parents parking on what is already deemed a busy road that frequently serves as a rat run from Bradley Road through to the Frome Road. Parents and visitors to the school are also using Balmoral Road to park their vehicles. Balmoral Road forms part of a small residential development occupied in the main by retired members of the community. Further development in the local area would have a detrimental impact on local residents as traffic in the immediate area would increase significantly posing health and safety issues for both young and elderly in equal measure.</p> <p>In conclusion, the proposed development at site 3565 would a significant increase in vehicles on main and minor roads would have a negative impact on the local community.</p> <p>Thank you for considering my objections to site 3565.</p> <p>Remove site 3565 from Proposal</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2201	Consultee Mr Barney Jones Person ID: 1132105	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Elm Grove Farm; Land south of White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Firstly thank you for the work you do. I am certainly very glad that someone is thinking hard about the bigger picture of Wiltshire's difficult planning needs.</p> <p>I am writing to strongly object to the recent Wiltshire Housing Site Allocations Plan, in particular (a) the change to the settlement boundary around Westbury to include the West Wilts Industrial Estate and (b) the new housing allocations between Trowbridge and North Bradley (plots 613/248 and 298).</p> <p>In summary, I think the combination of these proposals is to breach Wiltshire Council's planning commitment not to endanger the boundaries and characters of its historic settlements. These new proposals will introduce and reinforce an unacceptable sprawl/ribbon development stretching from Trowle, North West of Trowbridge through the town, to North Bradley, Yambrook, Heywood and into Westbury.</p> <p>The new changes mean there will often be just meters between housing of allegedly separate settlements, with no substantial boundary of fields. North Bradley and Yam book will become suburbs of Trowbridge. Encouraged by the boundary change, the area around the West Wilts Industrial estate (which under your plans would become part of Westbury town) will grow further to replace beautiful green fields with more empty low-value industrial lots full of rusting vehicles (all there seems to be there right now!).</p> <p>In other words, these new proposals amount to the effectual euthanasia of towns and villages that have been separate communities for a thousand years or more. If these proposals go through, there will certainly be very little point maintaining separate town and village political boundaries here - it would be more appropriate to merge them into one single sprawl entity we could call Trow-bury.</p> <p>I might also add there has been no attempt by Wiltshire Council or North Bradley village council to inform me over either of these proposals which so obviously affect the setting of the Grade 1 listed building that I own. I have spoken to others in the area and very few people seem aware of these changes - it appears Wiltshire Council have made no attempt to contact council tax payers despite the once-in-a-lifetime nature of these changes. This is unwise given recent legal action by listed building owners in similar cases.</p> <p>I am also concerned that there has been no Bat Survey conducted on the North Bradley site before this housing allocation has been suggested, despite the proven presence of endangered bats nearby. This is reckless behaviour by the Wiltshire Council and, as these sites tend to have their trees cut down by developers to get rid of bats once a housing allocation is made, therefore probably illegal.</p> <p>My counter proposal is simple: the Wiltshire Spatial Planning team needs to urgently introduce effective greenbelts or other no-building zones around towns and villages in our area. Low value, low rise, countryside-eating sprawl would be replaced by high-value, high-rise developments in town and city centres - for example, the site around Trowbridge station should be planned for residential flats at least six storeys high. It is ironic that a hundred years ago they were building six and seven storey warehouses in Trowbridge on the same sites where now our planning system allows one and two storey residential and commercial units!</p> <p>This "positive planning" will at a stroke save our historic towns, villages and green fields to be enjoyed by future generations. I have four young children myself and would hate for them to grow up thinking of our area as a dirty place of uncared for housing and industrial sprawl.</p> <p>Thanks for your attention, I look forward to receiving a reply soon (or indeed notification for the first time that some changes are planned!).</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2202	Consultee Imogen Gilbert	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131946		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>My name is Imogen Gilbert (f13) and I would like to talk to you about the houses in crudwell. I live in Crudwell and have done for all of my life and I think if you are going to build all these houses it will ruin our village.</p> <p>I love Crudwell as I have known it all my life but I feel if you build all these new houses it will ruin the villages tranquility and almost double the population making it into a small town.</p> <p>Thank you for reading my email and I hope you will rethink your plans as I know I'm only one person but I'm sure that plenty of people in the village would agree with me and what I'm saying. Once again thank you for reading my email.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2203	Consultee Imogen Gilbert	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131946	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell cofe primary school will be packed to the brim. With other schools surrounding it feeling the impact of this. Therefore the smaller children's pre school and primary school life will not be as in depth as I received my education as the teacher/s will have many students to deal with making students learning and chance for attention very slim. Let alone students for Malmesbury Secondary School.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2204	Consultee Imogen Gilbert	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1131946		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This is one of many problems I can think of that building these houses will cause some more are: Traffic on roads, Park being full, nearby village clubs and activities(brownies, scouts) e.t.c ruining our village for all the generations and all the generations to come.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2205	Consultee Amanda Baker	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132007	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Concern has been expressed regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Plan. Together with the 10 dwellings already being built on this site, this represents a near 20% increase in dwellings in the village of Crudwell (currently some 260 dwellings).</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell. A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell. Policy 1 of Wiltshire's Core Strategy states: "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met. Crudwell is not anti-development; it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p> <p>I would be most grateful if the concerns for Crudwell were given urgent and appropriate thought. The implications of the Ridgeway Farm development proposal, if not considered seriously could be to the severe detriment of the village as a whole.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2206	Consultee Tristan Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132008	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to write regarding the Draft Site Allocations Plan, specifically around the allocation of 40 houses to Crudwell which I feel is Not Justified.</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2207	Consultee Tristan Stevens Person ID: 1132008	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy. The Core Strategy also states that "At the settlements identified as villages, a limited level of development will be supported in order to help retain the vitality of these communities. At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. These settlement boundaries will also be reviewed as part of the Housing Sites Allocations DPD as set out in the council's Local Development Scheme, in order to ensure that they remain up to date and properly reflect building that has happened since they were first established. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan".				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2208	Consultee Tristan Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132008	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Crudwell is keen to retain its vitality and the allocation to Crudwell is both too large and outside of the Settlement Boundary, and this is simply without justification.</p> <p>There is no strategic need to put large scale development into Crudwell and, even if there was, this site is not appropriate.</p> <p>The Parish is currently undertaking a Neighbourhood Plan, and the Council would be better served by investing resources in supporting the Parish in this activity, rather than forcing and unwelcome development on its constituents.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2209	Consultee Tristan Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132008	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I remain concerned that large-scale development in Crudwell will have undesired consequences, for example over burdening the local school which has no capacity to expand.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2210	Consultee Tristan Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132008	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is also the case that the site is upstream of the Swillbrook pinch point which has been the cause of flooding in recent years.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2211	Consultee Tristan Stevens	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132008	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is already the case that Tetbury Lane is a dangerous road - too narrow for the agricultural traffic that use it already and without a footpath, yet this development will add 40-100 additional children who will use this to walk to school, not to mention the additional cars that would be added to this road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2212	Consultee Amanda Baker Person ID: 1132007	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development. Crudwell Primary School is already greatly over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields. The school's ability to expand is not guaranteed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2213	Consultee Amanda Baker	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132007	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2214	Consultee Amanda Baker	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132007	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2215	Consultee Mr Ioan Rees	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126777	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.23			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to object to the Draft Housing Allocation Plan and in particular the settlement boundary of Studley and Derry Hill which has significant inconsistencies and is not justified</p> <p>The main settlement boundaries around the two villages are generally satisfactory however the inclusion of an outlying separate settlement boundary around 21 houses on Old Road is an anomaly introduced by North Wiltshire DC. There is no justification for the inclusion of this area as it is inconsistent with the two other outlying areas of housing on Devizes Road and Norley Lane. The settlement boundaries were not drawn around the 15 or so houses on Devizes Road and the 28 houses on Norley Lane which is inconsistent considering all three are very similar small clusters of linear housing in the countryside, predominately on one side of roads leading from the villages.</p> <p>The Devizes Road houses are actually contiguous with the Derry Hill settlement, the Old Road housing is about 200m from the nearest village boundary and the Norley Lane housing about 350m from Studley. I consider that none of these clusters of housing should be part of the settlement boundary of either village as they are part of the countryside outside the settlements. The alternative of including all three is more consistent but undesirable.</p> <p>The suggested extension of the Old Road cluster across the A4 to include isolated and unrelated houses on the opposite side of this major road is illogical and inconsistent in comparison with the Devizes Road housing and 3 Bowood Estate houses fronting Church Road in the heart of Derry Hill which are all outside the settlement boundary. Wiltshire proposals correctly remove a part of the field to the north of Old Road from the settlement boundary which effectively split the Old Road cluster into even smaller areas.</p> <p>I believe at a time when a green open space in the heart of the Petty Lane housing estate in the middle of Derry Hill is proposed to be removed from the settlement, it is not logical, justified or consistent to retain the Old Road element of the settlement boundary.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Rag Cottage, Old Road, Studley, SN11 9NF and unfortunately have found it difficult to complete your standard online consultation form but I would like to take part in the oral part of the examination if possible.				

Comment ID:	2216	Consultee Mr & Mrs D McCarthy	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132024	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We would like to express our objection and concerns regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell. We are residents in the village and while understanding of the need for further development, including the current works to build ten dwellings, we are particularly concerned with the impact of a further 40 dwellings to our small village. Strategic Priority. There does not appear to be a strategic priority to allocate further housing in the village, the Ridgeway Farm total allocation represents a 20% increase, when there is a predicted oversupply of some 100 houses in the Malmesbury community area. The scale of the impact to the small village of Crudwell will be significant and change its character dramatically.</p> <p>In summary the impact to Crudwell of the additional allocation of 50 houses will be significant and detrimental to its services, facilities and safety of both residents and visitors to the village. Moreover, there does not appear to be a body of evidence to support the allocation from a strategic perspective. A far better approach would be to await the outcome of the Neighbourhood Plan, currently under development, to inform the housing need in Crudwell.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2217	Consultee Mr & Mrs D McCarthy	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132024	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The ability of local facilities and services to cope with the increase in numbers of people and levels of traffic. The increased traffic flow through the village and specifically on Tetbury Lane, which provides access to the village hall and children's play area as well as to the School, represents an increased hazard to pedestrians.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2218	Consultee Mr & Mrs D McCarthy	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132024	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We have witnessed first hand the impact of flooding in our village and actively work to clear and maintain our waterways to minimise the risk; additional housing will increase the risk of flooding.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2219	Consultee Mrs Clare Churchill The Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Fovant Parish Council Person ID: 391071		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.78			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Site Allocations Plan, Fovant Parish Council resolved to make the following response at a meeting held on 16th September 2017.</p> <p>Large Village Miscategorisation Even though it was accepted by Mr Milton during Public Examination of the South Wiltshire Core Strategy in July 2011 that Fovant wasn't a Large Village, this persists in the DPD.</p> <p>These representations were made again during the preparation of Wiltshire Core Strategy. The Planning Department were instructed by Wiltshire Council Cabinet in December 2014 to explain this as a matter of urgency. Following intervention by the local MP, a response was finally received in July 2015 referring to a further assessment that had been made which apparently concluded that Fovant was a Large Village. A copy of that assessment has been requested, but has not been forthcoming. It is regretted that the Planning Department denied Fovant the normal consultation process given to all other parishes to comment on such an assessment.</p> <p>In any event, the Planning Inspector instructed the Planning Department to take account of Fovant's incorrect categorisation when preparing the DPD, but this doesn't seem to have been done.</p> <p>Village Boundary The village boundary is incorrect as small villages shouldn't have a boundary.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2220	Consultee Mrs Clare Churchill The Parish Clerk Fovant Parish Council Person ID: 391071	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	Fovant				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Site Allocation It is noted that Hindon and Ludwell are excluded for site allocation because the schools in those villages were deemed incapable of expansion. Fovant has no school at all since Wiltshire Council chose to close it. Accordingly, the same reasoning for excluding Hindon and Ludwell should also apply to Fovant since it has no school at all. It is noted that the school at Dinton is identified as already being over capacity. However, unlike Ludwell and Hindon, Dinton is identified as being a school where space will occur due to dropping birth rates - do Wiltshire Council have evidence that birth rates will only fall in Dinton or is it expected that the same will also occur elsewhere? If so, then if Dinton is considered as being capable to support children in future, the same must surely apply elsewhere. Topographical and Infrastructure Limitations The Core Strategy recognises that it is not size but the opportunity for sustainability that is the key consideration. The whole of Fovant is in an Area Of Outstanding Natural Beauty, has two Conservation Areas, a Housing Restraint Area and an area of Important Open Space, all of which limit the opportunity for development. Fovant is a ribbon development generally running north-south along steep valleys of tributaries of the Nadder. The Core Strategy recognises that where settlements are linear or dispersed, further development would not necessarily contribute to sustainability objectives. Historic development has occurred along the tributaries which are considered to present a flood risk. Areas to the north and west of Fovant are also identified as being adjacent an area of Localised Flooding Incidents by the Strategic Flood Risk Assessment. Development to the east and west behind these historic dwellings on the valley sides has been consistently rejected by the Planning Office and Planning Inspectorate. The area to the north and to the west of Fovant was identified in the Town and Landscape Analysis of the SWCS as providing important open countryside separating Fovant from surrounding villages. Furthermore, Fovant has areas in the Settlement Setting Assessment marked as County Wildlife Sites and Ancient Woodland. The ribbon layout has meant that sites examined for small scale development on the outskirts of the village have been rejected for being too far from the remaining facilities and for being prone to flooding. Those sites closer to the remaining facilities have been rejected too. The existing Housing Policy Boundary appears to recognise the limited opportunity for sustainable growth other than by infilling. Even within these boundaries, Fovant has contributed to the Wiltshire housing stock with 12 housing completions and commitments since 2006 (draft Plan page 44). The proposed modifications to this historic boundary map, in the map and justifications Table A,2 on pages 22 and 23 of the draft Plan, are minor and logical. In terms of infrastructure, Fovant has no street lighting, no effective pedestrian walkway facilities, narrow (often single-track lanes) unsuited to increase in traffic, limited capacity to deal with additional sewerage or rainwater and is often subject to instability in the power supply.				

There are very few employment opportunities within the village with the vast majority of working residents commuting some distance for employment (both Salisbury and Shaftesbury being over 10 miles away).
 There is no school.
 Fovant has a long-established traffic and parking problems within the village, presumably as a result of reliance on cars for transportation to schools, shopping and employment.
 Transportation
 Fovant is identified as having a regular bus service with Tisbury, Shaftesbury and Salisbury. This is not true.
 There is only a limited bus service with Salisbury during daytime hours, with no service on Sundays or Bank Holidays. There is (currently) one bus in the morning and one in the evening to Salisbury that you could catch if you could time-shift your working day, but you wouldn't be able to work more than a few minutes from the bus route for even that to work.
 There is a bus from Fovant to Shaftesbury, but you have to stay overnight before you can come back.
 For Tisbury, there is a bus in the morning, but then you have to come back shortly after or also stay overnight.
 The draft Plan's assessment of SHLAA sites in Fovant parish
 Three large SHLAA sites had been proposed for Fovant and these were reviewed in the draft Plan. One, no. 3557, at Moor Hill, stated as having a potential for 96 houses, was rejected before final assessment stage (stage 3) because of the lack of suitable vehicular access (page 39). The other two sites, nos. 3449 and 3450, with potentials for 20 and 38 houses respectively, got through to the last stage but were then ruled out in Appendix F. Each site was scored with a single 'major adverse effect', thus One major adverse effect has been identified. The site is located in the Cranbourne Chase and West Wiltshire Downs AONB. The site as a farmstead appears wholly in keeping with its surrounds and its loss would result in the unacceptable urbanisation which would not be possible to mitigate (SA Obj. 7).
 There were five moderate adverse effects, covering potential groundwater issues and surface water run off, the nearness to the Conservation Area, the potential visual impact on the Fovant Badges scheduled monument, and the likely inability of Dinton Primary school to cope without problematic expansion.
 We consider that three of these moderate factors would be far more serious, and would better have been scored as 'major'.
 First, the Fovant Badges and the recently restored Sutton Down badge, all within the aegis of Fovant Camp of World War I, are increasingly recognised as extremely important heritage sites – witness the extent of media and public interest and the two recent major Heritage Lottery grants for work on badges on these two Downs. Officers have previously cited interference with the visual impact of the Badges in the refusal of planning submissions for houses in the grounds of Cross Keys house lower down the hill; houses on these two SHLAA sites, being even higher and likely far more numerous, would have an even more serious impact on the Badges.
 Secondly, interactions in 2016/17 between Fovant Parish Council and Wiltshire planners over the County's idea to build seven affordable houses on an Exception site on Sutton Road revealed the inability of the County to demonstrate that they would be able to protect that local area from flooding and also provide redress to householders if flooding occurred. This has an obvious relevance to these SHLAA sites, because of the potential for the increased surface water run off from housing developments on higher ground on the A30 to tip the balance for the handling of surface water lower down at the junction with High Street, with the potential for disastrous consequences for the several houses around that junction; some of these houses are listed.
 Thirdly, having lost our primary school and now having to rely on Dinton school, we believe that that no such development of Fovant should be considered until Dinton school has been expanded.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2221	Consultee Mr Jonathan Moffat Person ID: 1125984	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Salisbury - Netherhampton Road			Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I believe that the Proposed site allocations above are unsound because they are unjustified. Firstly it is unjustified because the proposed sites either side of the A3094 Netherhampton Road are in the parish on Netherhampton, not with the Salisbury development boundary. Netherhampton is a village and has already agreed to have a number of dwellings constructed in the village. Further substantial development of hundreds of houses would be contrary to para 4.16 of the Draft Allocation plan. Netherhampton is a distinct settlement with its own identity which should undoubtedly be preserved not incorporated as an extension of Salisbury. Although numerically small, it is a sustainable community as it is and should not be turned into a huge suburb of Salisbury. It is foreseeable otherwise that further development will creep all the way along the A3094 in the future once the green perimeter that currently exists is breeched. Lastly I do not think it is effective in providing needed new dwellings in a situation which is sustainable or appropriate. Most employment areas and transport links are on the northern side of the City and This is not the appropriate are for a whole new housing area, which in itself if far in excess of what the transport and local infrastructure can bear and will in itself create many more problems.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2222	Consultee Mr Jonathan Moffat	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Secondly the number of houses proposed totalling 740 dwellings is far in excess of the 594 shortfall in the whole of South Wiltshire in the Councils own calculations. Also it would appear that should these schemes be approved there could potentially be up to 1277 dwellings, so more than double the need.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2223	Consultee Mr Jonathan Moffat	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This would be a huge land grab totally out of proportion to the City, its requirements and infrastructure, as well as ruining a large tract of good quality arable land that forms part of the backdrop to the southern edge of the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2224	Consultee Mr Jonathan Moffat	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125984	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This would be a huge land grab totally out of proportion to the City, its requirements and infrastructure, as well as ruining a large tract of good quality arable land that forms part of the backdrop to the southern edge of the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2225	Consultee Mr Jonathan Moffat	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This would be a huge land grab totally out of proportion to the City, its requirements and infrastructure, as well as ruining a large tract of good quality arable land that forms part of the backdrop to the southern edge of the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2226	Consultee Mr Jonathan Moffat	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This would be a huge land grab totally out of proportion to the City, its requirements and infrastructure, as well as ruining a large tract of good quality arable land that forms part of the backdrop to the southern edge of the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2227	Consultee Mr Jonathan Moffat	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Thirdly, the local road network, consisting primarily of the A3094 Netherhampton road is already used heavily by traffic including commercial vehicles as a southern by-pass route alternative for traffic travelling on the A36 from Bristol to Southampton and vice versa, as well as local traffic. At peak times there are long tailbacks at both the Western end at Parkwall junction and the Eastern end at Harnham Gyratory. Both of these junctions have the physical ability to be changed to increase capacity, and the amount of traffic is already of great concern to the residents of Harnham. There is very little employment this side of the City, nor other facilities appropriate to large numbers of dwellings, which would in itself cause many additional car journeys, especially at peak times. It will also mean that motorists will make use of other minor roads such as through Quidhampton, Stratford Tony and Old Harnham, which are unable to accommodate any additional traffic. This is acknowledged in Para 5.136 that the current Transport Strategy does not contain measures to support the proposed allocations.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2228	Consultee Mr Jonathan Moffat	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Fourthly, approach to Salisbury from the west on the A3094 gives possibly the most unspoilt and original views of the Cathedral in it's original setting, unspoilt by modern development or city sprawl. From the attached photo you can see the initial view as one approaches the field site S1027, with the Cathedral prominently in the centre, unobstructed and quite dramatic. This site was previously removed from the Wiltshire core strategy due to the potential negative impact on the view as described above, and it would be of great disservice to both visitors and the local inhabitant to deprive them of this beautiful approach to the City. The value of tourism is vital to the city, and also the special pastoral views such as these are an important contribution to the attractiveness of the City, whether to the passer through, the Tourist or the inhabitant, and sustains the value and viability of the City as distinct from other less remarkable towns and Cities in the region, thereby keeping the local economy maintained and the quality of life for the inhabitants of the City and the surrounding villages, especially on this side of the City. [refer to attached photograph]				
Attached files (Please see Objective)	4727866 / 4727860				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2229	Consultee Mr Jonathan Moffat	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1125984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Fourthly, approach to Salisbury from the west on the A3094 gives possibly the most unspoilt and original views of the Cathedral in it's original setting, unspoilt by modern development or city sprawl. From the attached photo you can see the initial view as one approaches the field site S1027, with the Cathedral prominently in the centre, unobstructed and quite dramatic. This site was previously removed from the Wiltshire core strategy due to the potential negative impact on the view as described above, and it would be of great disservice to both visitors and the local inhabitant to deprive them of this beautiful approach to the City. The value of tourism is vital to the city, and also the special pastoral views such as these are an important contribution to the attractiveness of the City, whether to the passer through, the Tourist or the inhabitant, and sustains the value and viability of the City as distinct from other less remarkable towns and Cities in the region, thereby keeping the local economy maintained and the quality of life for the inhabitants of the City and the surrounding villages, especially on this side of the City. [refer to attached photograph]				
Attached files (Please see Objective)	4727866 / 4727860				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2230	Consultee Mr Christopher Green	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 408500		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027; S1028			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I'd like to put some questions and make comments on the proposal for around 800 houses in Harnham, Salisbury. S1027 and S1028.</p> <p>The A3094 from the Harnham Gyratory to Wilton and from Skew bridge to Wilton is a congestion zone, so much so councilors have been asked to reduce traffic in these areas not add to it.</p> <p>This is extremely busy, especially at peak times. Unless plans to improve the road network are made before these sites are allocated, this should not be agreed. Such improvement should include safe routes for cyclists and pedestrians to local facilities and employment.</p> <p>How much thought is being given to the provision of other services, such as schools, shops, and medical services? Too many developments lack these essential services within walking distance, encouraging more travel by car, with the consequent problems of congestion and pollution. I have been informed there is no plan for any road infrastructure is likely to be.</p> <p>We must consider other concerning issues, such as the number of Race days at Salisbury races course and large events at Wilton houses, all of which pack out the local B roads.</p> <p>The proposal for building has been rejected twice, now matters are worse than then, I, therefore, would like this proposal rejected.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2231	Consultee Mr Christopher Green	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 408500		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S1027; S1028			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I'd like to put some questions and make comments on the proposal for around 800 houses in Harnham, Salisbury.</p> <p>Another point that's been overlooked is that Wellworthy housing Estate or constable court as it's known.</p> <p>This estate is cut close into the hillside of what's known as 'Harnham Slope' an ancient trackway and Historic and Ecological site at the chalk pits.</p> <p>If the housing on Plot 1028 was there, which is high above these Wellworthy houses rooftops was to go ahead, this would cut out the Sun all day from the entire south side from Harnham Transmitter mast and to the West (In-Excess Side) as it tracks around during the day, ruining summer days & this would be particularly bad in the winter's short days. Casting long shadows all day and cutting out direct sunlight. Similar to being surrounded by skyscrapers, It would make this Close even more gloomy and not what people purchased them for.</p> <p>The proposal for building has been rejected twice, now matters are worse than then, I, therefore, would like this proposal rejected.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2232	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED SITE PLAN: Bovis - WHSAP response - Policy H3.3 Policy H3.3 North of Netherhampton Road, Salisbury Bovis Homes support the Council's decision to allocate land under their control to the north of Netherhampton Road, Salisbury for circa 100 dwellings. They consider that the site is ideally placed to meet part of the additional housing and/or employment requirement in the South Wiltshire Housing Market Area. Indeed Bovis Homes control additional land to the west of the proposed allocation which could provide additional residential or employment development. The extent of this land is shown on the attached plans. These plans demonstrate how by incorporating this land the proposals provide a better gateway to Salisbury in this location. A high-level study of the technical and environmental site constraints and opportunities detailed existing site knowledge and supplemented by visual walk-over survey to confirm key assumptions. Therefore, whilst proposals will be subject to further investigation and survey, the proposed scheme can be considered as both achievable and deliverable. Inclusion of additional land north of Netherhampton Road has the potential to create a number of benefits:- 1. Opportunity to create a new consolidated Gateway to Salisbury on approach from the west - through a controlled enclosure of built form which logically extends the existing settlement as a series of streets and spaces, rather than simply driving past a new estate on the approach to the City. The site is available with only one landowner and can be delivered as it is under the control of an experienced national housebuilders. There are no constraints to the development of the site as follow:- The site comprises intensively farmed arable land that is in one ownership. The farmland is 'in hand' and is not subject to any agricultural tenancies. It is therefore available for development in the short term and is achievable with a realistic prospect for delivery as the land is controlled by an experienced developer in Bovis Homes. The site is well located to a range of services and facilities which would include strategic and local employment areas, as well as shops and other facilities. Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.</p>				
Attached files (Please see Objective)	4728127				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	2233	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: Bovis - WHSAP response - Policy H3.3 To naturally reduce traffic speeds on Netherhampton Road - by taking in land on either side of Netherhampton Road the route can be designed as a series of new, human scale spaces which together create a pedestrian friendly streetscape to encourage walking and cycling, linking new and existing communities. The site can be satisfactorily accessed through the introduction of a junction to the requisite standards in the A3094 Netherhampton Road this has been confirmed by Bovis Home's retained highway consultant. Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.				
Attached files (Please see Objective)	4728127				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	2234	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SEE ATTACHED SITE PLAN: Bovis - WHSAP response - Policy H3.3 The ability to deliver a larger quantum of development - for employment or residential uses as necessary. Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.			
Attached files (Please see Objective)		4728127			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The issues raised need to be the subject of discussion and debate.			

Comment ID:	2235	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: Bovis - WHSAP response - Policy H3.3 Create a series of publicly accessible open spaces from which previously glimpsed views (when considered primarily from the vantage point of the motorist) to the City and Cathedral can be more fully experienced. Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.				
Attached files (Please see Objective)	4728127				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	2236	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SEE ATTACHED SITE PLAN: Bovis - WHSAP response - Policy H3.3 Opportunity to logically site community and retail uses on the primary route into the City whilst still occupying a central location within a wider residential area – and in doing so, improve the commercial viability of any proposed retail outlets. Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.			
Attached files (Please see Objective)		4728127			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The issues raised need to be the subject of discussion and debate.			

Comment ID:	2237	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED SITE PLAN: Bovis - WHSAP response - Policy H3.3 The site is not within any valued landscape as defined within paragraph 109 of the NPPF. The landscape has the capacity to accommodate development whilst retaining views of Salisbury Cathedral. The initial Landscape and Visual Impact Assessment has been undertaken and confirms the sites capacity to absorb the quantum of development proposed. Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.				
Attached files (Please see Objective)	4728127				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	2238	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED SITE PLAN: Bovis - WHSAP response - Policy H3.3</p> <p>The site is not the subject of any ecological designation or designated sites of importance for biodiversity (eg SPA, SSSI). The site is in arable use. It has been substantially managed and regularly ploughed. Hedgerows are sparse and there are virtually no trees (apart from isolated trees close to the Netherhampton Road) on the site. There is therefore little opportunity for protected species to establish themselves on the site. The proposals would provide an opportunity to provide biodiversity enhancement measures, including the introduction of a wider variety of habitats than currently present across the agricultural land.</p> <p>Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.</p>				
Attached files (Please see Objective)	4728127				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	2239	Consultee Bovis Homes	Agent Mr Des Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 899628	D2 Planning Limited Person ID: 899623	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED SITE PLAN: Bovis - WHSAP response - Policy H3.3 The entirety of the site is located within Flood Zone 1 and there are no flooding issues.</p> <p>Surface water would be capable of being discharged to the ground via infiltration techniques. The nearby Petersfield Sewage Treatment Works has satisfactory hydraulic capacity to accommodate predicted foul water drainage from the proposed development. • There are no statutorily designated heritage assets within the site or in proximity of the site. In view of the above, the site is available and deliverable and there are no constraints to the development moving forward.</p> <p>Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.</p>				
Attached files (Please see Objective)	4728127				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The issues raised need to be the subject of discussion and debate.				

Comment ID:	2240	Consultee Miss Janet Goddard	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126757		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are no bus services, shops, doctors or dentists in this area – all these facilities would have to be accessed in Salisbury or Wilton, neither of which is in practical walking distance so yet more car journeys would be added to the commuter traffic.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2241	Consultee Miss Janet Goddard	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126757	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Access to the railway station in Salisbury (and Wilton if the planned reopening goes ahead) would mean that these houses would be purchased by commuters travelling to London/Basingstoke etc. These residents would contribute little to the local economy and the houses themselves would be neither affordable nor available to local people				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2242	Consultee Miss Janet Goddard	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126757		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Access to the railway station in Salisbury (and Wilton if the planned reopening goes ahead) would mean that these houses would be purchased by commuters travelling to London/Basingstoke etc. These residents would contribute little to the local economy and the houses themselves would be neither affordable nor available to local people				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2243	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I implore you to consider the highly negative effects that the development of Site 321 will have on Bratton, a charming and individualistic village surrounded by an immensely beautiful and historic landscape. The high-density housing estate proposed will ruin the aesthetically pleasing entrance to the village, needlessly destroying greenbelt land renowned for its beauty and tranquillity. Such a development will set a dangerous precedent – in twenty years, how much of our glorious countryside will be dominated by rows and rows of houses? After the demolition of the Cement Works chimney, which was viewed as a ‘blot on the landscape’ by many, it seems hypocritical to mar the countryside with forty houses, which would be better situated in a town such as Westbury, where there are better facilities and infrastructure. Site 321 houses two Public Rights of Way, is classified as a Special Landscape Area			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		For the reasons I have outlined above in Question Six.			

Comment ID:	2244	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The report concludes that Site 321 is the only plot of land in the Westbury area suitable for development – on the contrary, there is plenty of land surrounding Westbury better suited to this purpose than Site 321. Moreover, Westbury is more centrally located than Bratton, with the proposed site being situated in a relatively remote, geographically immobile location. Wiltshire Council should listen to the wishes of Bratton Parish Council, who were elected to represent the villagers' wishes. They voted overwhelmingly to reject these plans, with no councillors voting in favour– nine voting against and one abstaining. Considering that the proposal has been rejected twice previously, it astonishes me why it should even be considered a third time. It was previously rejected 'to preserve the character and scenic quality of the landscape' – nothing has changed. The character of our village should not be sacrificed on the altar of government targets and private profit.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		For the reasons I have outlined above in Question Six.			

Comment ID:	2245	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There will be many negative externalities which will affect the quality of life in the village, such as air pollution, noise pollution and increased litter and waste.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	For the reasons I have outlined above in Question Six.				

Comment ID:	2246	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The addition of forty houses to the village will also put increased strain on the public services in the village, with the doctor's surgery and primary school already oversubscribed. The report seems oblivious to this extreme pressure on village amenities and appears to be unaware that the village has no need for the forty affordable dwellings it suggests.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	For the reasons I have outlined above in Question Six.				

Comment ID:	2247	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The 2014 Bratton Parish Housing Needs Survey results showed that under ten houses were needed by local residents and Bratton Parish Council has identified land in Pear Tree Orchard that will satisfy these demands. Therefore, it is unnecessary to undertake such a large-scale development when there is no particular demand for it.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		For the reasons I have outlined above in Question Six.			

Comment ID:	2248	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		In addition, the proposal for Site 321 contradicts Wiltshire Council's Core Policy (2015), which states that the Council does not wish to deliver strategic housing in either large or small villages in the county. In light of this, the proposition appears unsound and in direct opposition to the aims and purpose of Wiltshire Council.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		For the reasons I have outlined above in Question Six.			

Comment ID:	2249	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The development will also lead to greater congestion on the B3098, with an extra eighty cars driving through Bratton every day, with numbers possibly increasing as time goes on. The country roads surrounding Bratton are unsuitable for this volume of traffic and a substantial increase in vehicles on the B3098 would be dangerous – this road has more accidents than most rural roads, with 49 reported collisions, 11 of which were serious, since 2000.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		For the reasons I have outlined above in Question Six.			

Comment ID:	2250	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Site 321 houses two Public Rights of Way, is classified as a Special Landscape Area and is a site of medium archaeological sensitivity. It borders the Bratton Conservation Area and is overlooked by a Site of Special Scientific Interest. The site is also adjacent to the English Heritage site of Bratton Camp, an Iron Age Hillfort with archaeologically important earthworks			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		For the reasons I have outlined above in Question Six.			

Comment ID:	2251	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	an extensive chalk grassland. This provides a habitat for a diverse range of insects, such as the Adonis Blue butterfly and the Scarce Forester Moth, both of which are rare species. Extensive building would no doubt disrupt these insects and other animals that live in this environment, whilst also damaging the archaeologically rich landscape.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	For the reasons I have outlined above in Question Six.				

Comment ID:	2252	Consultee Miss Niamh Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132119		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The report wrongly calls the location 'sustainable' and says that 'the sustainability benefits of the site are considered to be good'. Considered by whom exactly? Defined in environmental science terms, sustainability is 'the quality of not being harmful to the environment or depleting natural resources, and thereby supporting long-term ecological balance'. Building on greenbelt land is the antithesis of the concept of sustainability. Furthermore, the site scored negatively in nine out of twelve of the Wiltshire Sustainability Appraisal categories – further proof that the proposal is not sustainable and will only damage the environment and harm local wildlife.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	For the reasons I have outlined above in Question Six.				

Comment ID:	2253	Consultee Dr Leo Aylen	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704678	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	2254	Consultee Damian and Nicola Gilmartin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132154	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>as residents of Crudwell, then we would like to raise the following issues in regard to the draft site allocation plan and consultation. We are concerned about the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Plan. Together with the 10 dwellings already being built on this site, this would represent a 20% increase in dwellings in the village. Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met.</p> <p>We are not anti-development; but our friends and neighbours mainly wish to have a say in any growth via the emerging Neighbourhood Plan. Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development. We cannot see that there is a substantiated strategic need for further housing allocations in Crudwell. It would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell village is not anti-development, and acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p> <p>We trust that our views will be considered, along with those of other villagers, in the consultation.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2255	Consultee Damian and Nicola Gilmartin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132154	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. So we have to ask - is there any strategic need for a site of this scale in Crudwell?</p> <p>A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2256	Consultee Damian and Nicola Gilmartin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132154	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2257	Consultee Damian and Nicola Gilmartin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132154	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2258	Consultee Damian and Nicola Gilmartin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132154	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell Primary School is already over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields. The school's ability to expand is not guaranteed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2259	Consultee Damian and Nicola Gilmartin	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132154	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2260	Consultee Alex Stewart	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132165	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to express my concern as to how the council can 'green light' the proposed development at ridgeway farm Crudwell. The village has made its view clear at the area board meeting and further to that I wish to ask how is it possible when the proposal effects an area outside the permissible bounds of development in Crudwell. The area is also a green field site. Tetbury lane can not cope with any further additional traffic. This is not sustainable development especially when you consider that this will be a increase of over 35% of the number of house holds in the village not to mention up to 100 extra cars (two cars per house hold, some have more...)in to a single track lane every morning.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2261	Consultee Alex Stewart	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132165	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	the drains in the village and surrounding area can not cope as it is let alone with a additional 50 (we already have 10 under construction).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2262	Consultee Alex Stewart	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132165	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The school is at full capacity and there is no village shop. A proposal for half the houses was turned down last year by the council for all the above. How can it now consider a proposal for more? I shall take the matter up with James Grey our MP				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2263	Consultee Mr Anthony Rideout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132174		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by ¼ during the Plan Period (and more after that) which exceeds the requirement for a 5 year supply. The Plan is not effective because WC's examination of "Windfall", which is expected to provide 60% of new housing is grossly inadequate – comprising one page out of 4500 pages of the plan documents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2264	Consultee Mr Anthony Rideout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132174		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge			Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2265	Consultee Mr Anthony Rideout	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132174		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not consistent with National Policy because WC has failed to give a proper weight to Brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2266	Consultee MR Jeremy Kelton Person ID: 1126756	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the changes to the settlement boundaries for East of Dene and Boreham/Spurt Mead are not required and are illogical. In the case of the East of the Dene site this will allow developers the opportunity to further speculatively develop beyond the proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified- The draft plan for Warminster is not an appropriate strategy, when compared with other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable. It is noticeable that Warminster now has only 1 doctors' surgery with the closure of the Smallbrook Practice; that the local designated primary school is full, as is Warminster's only secondary school which, furthermore, has no room for expansion on its present site. Laying a financial contribution against a developer cannot conjure these types of service out of thin air and therefore need a deeper understanding of the infra-structure implications and needs as a result of development of the Boreham/Spurt Mead and East of the Dene sites. This argument equally applies to Warminster's employment situation, where most of its employees travel out of Warminster which, with the exception of Salisbury and the army facilities on Salisbury Plain, are accessed by roads across the town from these sites i.e. the A36 west and the A350 north and south. In Bishopstrow we are also deeply concerned by the potential for coalescence into Warminster. Both the sites mentioned here build on or close to Bishopstrow's parish boundary and Conservation Area.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire Council forces developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent- The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p>				

	<p>An analysis of the maps provided in your consultation documents show the risks of flooding in Bishopstrow due to upstream developments. The development of Boreham/Spurt Mead and East of the Dene will not reduce this risk and in fact has the potential to make the situation worse, as recent flood events have consistently shown.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for spring 2018.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2267	Consultee Mrs Sharon Neal Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Hullavington Parish Council Person ID: 849874		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Comments from Hullavington Parish Council for the consultation on the Pre-submission draft Wiltshire Housing Site Allocation Plan are: Hullavington Parish Council was pleased to note that the area designated by Wiltshire Council was also the choice of the village, following the results of a questionnaire that was circulated throughout the village by the Neighbourhood Plan Steering Group recently. The Parish Council is concerned regarding access to the site as shown on a proposed plan as illustrated during a recent presentation by Hannick Homes. It considers that Highway improvements would be needed at the cross roads of the C31/C33				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2268	Consultee Mrs Sharon Neal Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Hullavington Parish Council Person ID: 849874		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Comments from Hullavington Parish Council for the consultation on the Pre-submission draft Wiltshire Housing Site Allocation Plan are: concerned as to whether the sewerage farm would be able to cope with any future development. There is also concern regarding the effect on water pressure as some areas of the village do have problems with very low pressure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2269	Consultee Mr Robert Escott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132158		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off the A363 at White Horse Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The parcel of land lies adjacent to the White Horse Business Park. In my opinion, no one will want to live within this area because of the low frequency, permanent noise, appearing to emanate from the LF Beauty air conditioning unit on top of its building. I reported this to Wiltshire Council Environmental Health two months ago, and again last week. The noise has been persistent for a couple of years. Mostly noticeable in the summer months. I have recorded the noise on several occasions and hold this as evidence. I am awaiting a response from Environmental Health to investigate further. I do have some other issues, in line with other representations but this is the most important in my view. If this can be resolved it would be a step in the right direction.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2270	Consultee Mr. David Searle	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704409	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the above plan. I object to the plan, as it stands, as I consider that not enough thought has been applied to retain agricultural land before using land which is not productive in this way.</p> <p>The site to the East of the Dene is essentially agricultural and I consider that it should remain so for the foreseeable future.</p> <p>In conclusion I consider that agricultural land should be safeguarded and should be grateful if you would recognise my objection to the proposed plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2271	Consultee Mr. David Searle	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704409		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.9			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I can quite see that the land to the south west of the Boreham cross roads could be used as it has been filled with waste material and is not sufficiently large to be used for agriculture.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2272	Consultee Mr. David Searle	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 704409	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	I am pleased to see, however that the land surrounding the school in Woodcock Road has been removed from the boundary as too many school playing fields have been lost in recent times.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2273	Consultee Lesley Bailey Person ID: 1132247	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing as a Crudwell resident of over 30 years standing to express my concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Plan. Together with the 10 dwellings already being built on this site, this represents around 20% increase in dwellings in the village of Crudwell. This is disproportionate, unnecessary and unwelcome.</p> <p>There is absolutely no strategic need for a site of this scale in Crudwell. The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. A similar level of oversupply of around 2200 houses is forecast across the wider North and West Wiltshire housing market area. This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met. Crudwell is not anti-development, it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2274	Consultee Lesley Bailey Person ID: 1132247	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic.</p> <p>It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development.</p> <p>To summarize, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell in not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2275	Consultee Nick Egerton Person ID: 1132255	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>No evidence of housing need for Yatton Keynell</p> <p>The proposal for 30 houses on land east of Farrells Field has been put forward at County level in order to meet the County's strategic housing requirements for the Chippenham remainder area. The site allocation for 30 houses in Yatton Keynell is not based on any evidence that there is a specific local housing need in Yatton Keynell. Appendix E of the Chippenham Community Area topic paper, confirms that no local housing needs survey was undertaken as part of the draft Plan. The proposed dwellings should be justified with evidence that there is a specific local need and the plan should confirm how that need will be met.</p> <p>In light of the above the plan is unsound, it not justified and is not consistent with national policy set out in paragraph 158 of the NPPF which states:</p> <p>'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'.</p> <p>Absence of a Neighbourhood Plan</p> <p>Of the five large villages within the Chippenham Community Area, Yatton Keynell is the only village without a Neighbourhood Plan. It is acknowledged that delivery of housing supply through a community led Neighbourhood Plan offers a positive and proactive approach to delivering housing need rather than a site selection process which is only put forward by landowners.</p> <p>The local Ward Councillor called for a Neighbourhood Plan to be made at a Parish Council meeting back in November 2014 (copy of minutes attached). This was suggested in response to specific concerns that were raised by the community in relation to the proposal for development of land adjacent to Farrells Field. The Parish Council have not addressed this request.</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states:</p> <p>'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be engaged in a proactive way, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>Site selection process unsound</p> <p>Para 5.13 of the Chippenham Community Area Remainder Topic Paper – June 2017 states that the village of Sutton Benger which has an identified a housing need, was discounted as a village which could accommodate additional housing growth. The Plan states that the village primary school cannot accommodate growth and therefore the village cannot accommodate more housing. The exclusion of the village from the housing allocation plan seems unjustified as the plan should consider all housing types not just those for families. Just because the school is full that doesn't exclude new housing being delivered for elderly, and people without children (flats starter homes). If some additional housing was accepted in Sutton Benger it might reduce the overall need for housing which has been identified in the other larger villages where there is considered no housing need.</p>				

	<p>The village of Yatton Keynell which has no evidence of identified housing need (this is minutes in Parish Council Meeting minutes November 2014), and no Neighbourhood plan has been identified for having a significant proportion of the 138 dwellings needed to meet the Chippenham Area Strategic housing target.</p> <p>The housing sites selection process is contrary to Para 159 of the NPPF. It states: 'Local planning authorities should have a clear understanding of housing needs in their area. They should: -prepare a strategic Housing Market Assessment to assess their full housing needs andThe Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which addresses the need for all types of housing, including affordable housing and the needs of different groups in the community such as but not limited to families with children, older people people with disabilities, service families and people wishing to build their own homes...';</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2276	Consultee Nick Egerton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132255		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Another factor which was not considered as part of the site selection was the landscape constraints in place for the village Yatton Keynell. A significant amount of Yatton Keynell settlement and adjoining land is washed over by AONB rendering a large area of land that is not available for development. This fact should have been identified as a constraint in the overall site selection process and taken into account when considering the amount of new development proposed in the village.</p> <p>30 dwelling will have a significant impact on the character of the area</p> <p>Para 5.31 identifies land East of Farrells Field, Yatton Keynell for the development of approximately 30 dwellings. The Council claim that 'it is in a location that has the capacity to accommodate change from an environmental, heritage and landscape perspective, and could assimilate into the existing built form, whilst positively conserving and enhancing the village-edge setting'. However, a large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2277	Consultee Nick Egerton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132255		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure issues Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area. These issues are identified in the site allocation supporting text, and the need for a capacity appraisal and further assessment is required. Infrastructure needs should be identified and established prior to the allocation of the site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2278	Consultee Nick Egerton Person ID: 1132255	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Lack of community engagement and poor consultation</p> <p>The draft plan process is lengthy, complicated and difficult for the public to become engaged with. The planning process which has taken place and resulted in the Farrells Field site being put forward for housing, has not been meaningful, as it has not provided opportunity for the local community to comment on or consider alternative sites. The Parish Council have not engaged in the plan process or adequately represented the views of the local people in response to the proposal being put forward.</p> <p>I consider the proposed allocation for such a large site which will have such a significant impact on the community in yatton Keynell should be the subject of more meaningful consultation process by means of a Neighbourhood Plan.</p> <p>It is my understanding (from P61 of the Chippenham Community Area Remainder Topic Paper) that of the five large villages identified as part of the Chippenham remaining area, none of the Parish Council's responded to the Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement. It states in para 2.23:</p> <p>'Town and parish councils are the most local tier of democratic representation and, as such, they provide a key link with local communities. They are a specific consultation body under the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires that Wiltshire Council has to consult with specific consultation bodies which they consider may have an interest in the subject. Wiltshire Council is committed to continuing to consult with the local councils'.</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states:</p> <p>'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2279	Consultee Persimmon Homes Persimmon Homes	Agent Mr Jeremy Higgins Grosvenor Court	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132230	Pro Vision Person ID: 1132220	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy H3.1 (Land at Netherhampton Road)</p> <p>5.3 Like the land north of Netherhampton Road, as the Stages of Site Assessment plan above clearly shows, only a small part of the now proposed allocation was considered at the earlier stages of the site assessment process and the proposed allocation of the now much larger seems to be without any real justification other than the Susatrainability Appraisal, the conclusions of which we challenge for the reasons given in this document.</p> <p>5.4 The revised SA contained in the previous section of this document clearly demonstrates that this site scores more poorly than the land north of Downton Road. In light of this, it is considered that the allocation should be reduced by 190 dwellings. Reducing the number of proposed dwellings should not affect the ability of the proposed allocation to deliver the proposed primary school as such a facility is proposed on the land north of Downton Road, where the number of proposed dwellings (290) is lower than the proposed reduced allocation (350) on the land at Netherhampton Road.</p> <p>5.5 In light of the above, it is considered that inclusion of the land at Netherhampton Road in the DPD with the current amount of housing, would render the plan unsound as it does not represent the most appropriate strategy when considered against the reasonable alternatives i.e. land north of Downton Road. Land north of Downton Road should instead be allocated for the provision of 290 dwellings.</p> <p>[see attached for full representation]</p>			
Attached files (Please see Objective)		4729436			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		It is considered necessary to participate in the oral part of the examination to demonstrate how the approach that the council has taken in selecting the sites proposed for allocation is flawed.			

Comment ID:	2280	Consultee Persimmon Homes Persimmon Homes	Agent Mr Jeremy Higgins Grosvenor Court	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132230	Pro Vision Person ID: 1132220	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Policy H3.3 (North of Netherhampton Road)</p> <p>5.1 The revised SA contained in the previous section of this document clearly demonstrates that this site scores more poorly than the land north of Downton Road and should not have been proposed for allocation. Furthermore, it would appear that allocation of this site was not even considered until the later stages (stage 3) of the site selection process (which were not the subject of public consultation). A copy of a plan prepared by the Council during the earlier stages of the site selection process is shown below. This clearly demonstrates that the land north of Netherhampton Road was not considered for selection during the earlier stages (stages 1 & 2) of the site selection process.</p> <p>5.2 In light of the above and the contents of sections 3 and 4 of this document, it is considered that inclusion of the land north of Netherhampton Road in the DPD would render the plan unsound, as it does not represent the most appropriate strategy when considered against the reasonable alternatives i.e. land north of Downton Road. Land north of Downton Road should instead be allocated for the provision of 290 dwellings.</p> <p>[see attached for full representation]</p>			
Attached files (Please see Objective)		4729436			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		It is considered necessary to participate in the oral part of the examination to demonstrate how the approach that the council has taken in selecting the sites proposed for allocation is flawed.			

Comment ID:	2281	Consultee Persimmon Homes Persimmon Homes	Agent Mr Jeremy Higgins Grosvenor Court	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132230	Pro Vision Person ID: 1132220	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Table 4.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Table 4.1</p> <p>5.9 Table 4.1 sets out the Council's estimated Housing supply to meet the housing requirement contains within the adopted Wiltshire Core Strategy. This includes completions and developable commitments. the Council has confirmed in an email dated 15 September (a copy of which is attached as Appendix 7) that the allocated strategic site at Churchfields is included within the developable commitments figure. However planning permission is yet to be granted for the allocated 1,100 dwellings and the fact that the Council is now proposing to allocate the land at Netherhampton Road to compensate and try to address the lack of delivery from the Churchfields sites speaks volumes about the likelihood of the allocation at Churchfields ever delivering any of the allocated dwellings.</p> <p>5.10 The Council has a history of allocating large housing allocations in and around Salisbury and this has led to problems in terms of the delivery of new housing in the past. The allocation of a smaller number of larger sites provides a less flexible housing land supply. Allocation of the land north of Downton Road would provide a more flexible supply of allocations which could deliver new housing more quickly and in a more sustainable location).</p> <p>5.11 Paragraph 6.19 of Topic Paper 4 (Developing Plan Proposals) states "Further sites at Salisbury support provision for primary education in the south of the City. They improve choice. They also help to safeguard land supply should there be unforeseen and serious delay with the delivery of any other sites". In light of the email attached as Appendix 2, it seems clear that the contents of paragraph 6.19 apply just as much to the land north of Downton Road as they do to the sites proposed for allocation at Netherhampton Road.</p> <p>5.12 In light of the above and the conclusions of section 4 of this document, the land north of Downton Road should be allocated instead of the land north of Netherhampton Road and part of the land off Netherhampton Road or in addition to these sites.</p> <p>[see attached for full representation]</p>			
Attached files (Please see Objective)		4729436			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2282	Consultee Persimmon Homes Persimmon Homes	Agent Mr Jeremy Higgins Grosvenor Court	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132230	Pro Vision Person ID: 1132220	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.21			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Paragraph 4.21 5.6 Paragraph 4.21 states “The focus for further work was the set of ‘more sustainable’ sites identified at stage 3. Further consultation with stakeholders helped to develop potential sites into site options with individual housing capacities and specific boundaries. Consultation also helped to identify requirements that should be highlighted for individual site options, to guide the form development should take, including the definition of realistic site boundaries. In exceptional circumstances, it was necessary to consider ‘less sustainable’ sites”. This paragraph highlights the Council’s muddled thinking and flawed Sustainability appraisal and has led to the proposed allocation of unsuitable sites (such as the land north of Netherhampton Road) and the exclusion of sites suitable for allocation, namely the land north of Downton Road. [see attached for full representation]				
Attached files (Please see Objective)	4729436				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is considered necessary to participate in the oral part of the examination to demonstrate how the approach that the council has taken in selecting the sites proposed for allocation is flawed.				

Comment ID:	2283	Consultee Persimmon Homes Persimmon Homes	Agent Mr Jeremy Higgins Grosvenor Court	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132230	Pro Vision Person ID: 1132220	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.67			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 4.67</p> <p>5.7 Paragraph 4.67 states “The site at Netherhampton Road has the ability to address the lack of housing delivery at Churchfields, later within the plan period, and also the potential to provide employment land for Churchfields businesses to relocate, thereby freeing up land at Churchfields for housing delivery in the longer term. The WCS identifies the site within an area of search, to be considered if further land is required in future to meet housing requirements, as part of the Council’s monitoring process. Monitoring has shown that further land is required due to the redevelopment of Churchfields taking longer than anticipated. The Plan therefore implements this contingency in order to ensure a sufficient supply of housing. The allocation of land at Netherhampton Road, a substantial site, will not lead to an increase in the overall scale of housing growth at Salisbury than was proposed by the WCS”</p> <p>5.8 The contents of this documents have shown that the Sustainability Assessment of the proposed allocations is flawed and has resulted in the proposed allocation of sites that perform less well than sites which were previously being considered for allocation i.e. the land north of Downton Road. The land north of Downton Road could provide the same function as the proposed allocation at Netherhampton Road in terms of providing a contingency from the expected (and likely) underdeliver from the allocated strategic site at Churchfields and in a more sustainable location. It is therefore considered, the proposed allocation at Netherhampton Road in its current form renders the plan unsound, as it does not represent the most appropriate strategy when considered against the reasonable alternatives i.e. land north of Downton Road.</p> <p>[see attached for full representation]</p>				
Attached files (Please see Objective)	4729436				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is considered necessary to participate in the oral part of the examination to demonstrate how the approach that the council has taken in selecting the sites proposed for allocation is flawed.				

Comment ID:	2284	Consultee Mrs M L Surry Person ID: 1105334	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6			Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith. The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state: 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include: • Boundary hedgerows / tree lines • Lambrok Stream These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2285	Consultee Tim Roberts	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132276		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Re: Wiltshire County Council Draft Site Allocations Plan – It is important to differentiate between the village of Crudwell and the designated area for the Neighbourhood plan which is the Parish. I believes the village has been described as Large because it has two Hotels, two Pubs, a large lorry haulage yard, a car sales and servicing facility and a School.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2286	Consultee Tim Roberts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132276	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many farms surround the Village farms. The village has about 250 dwellings Crudwell Parish Council has in the past supported the introduction of new build housing projects as a means of sustaining the viability of the village and will continue to do so in the future. With the introduction of small estates every few years the character of the village has not been spoilt and the Conservation area has not been threatened. The centre of the village has been developed from the A429 and the rural feel of the village has been maintained.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2287	Consultee Tim Roberts Person ID: 1132276	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Ridgeway Farm had been submitted to Wiltshire Council back in 2014. That application drew much local opposition from local people, principally on the grounds of the scale of the development, it being outside the designated red line settlement boundary, and its likely impact on the local infrastructure, specifically: the likely increased traffic on Tetbury Lane; impacts on already overburdened drainage and sewerage systems and oversubscription of Crudwell Primary School.</p> <p>It is clear there is a lot of local opposition to having a site allocation plan forced on the village. Over a hundred parishioners turned up at the last Area Board meeting to voice their opinion and over £5000 was raised in a fortnight to engage a consultant to put the villages case to an Inspector. 2</p> <p>In Conclusion I am surprised a Development as large as this is proposed in a small village with a significant conservation area which already has a School which is full, an identified Sewerage and Drainage problem, has no shop and a bus service which at best is poor and is planned to be reduced. I believe the village has the opportunity through its emerging Neighbourhood Plan to define its own future.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2288	Consultee Tim Roberts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132276	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst it is understood that Wiltshire Council needs to ensure an adequate five year housing land supply across each housing market area, the Site Allocations Plan would result in an oversupply of 4,284 dwellings to 2026 when past completions are combined with deliverable commitments, and windfall sites are included. Even when windfalls are excluded, the oversupply is still 2,198 dwellings across the Housing Market Area. The Site Allocations Plan also results in an oversupply of homes in the Malmesbury Community Area, even without windfalls. Wiltshire Council has a history of oversupply of homes in the former North Wilts area excluding Chippenham. In eight of the last ten years more homes have been built than planned, in the other two years targets were virtually met. In fact over the last ten years the average oversupply has been 143% higher than planned. On this basis, there is no strategic need to identify any new homes at Crudwell, so the Wiltshire Site Allocations Plan should not do so. I believe that this plan if adopted will set a planning precedent that will be impossible to manage, it being outside the designated red line settlement boundary.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2289	Consultee Tim Roberts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132276	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	A major concern to Parishioners is the risk of flooding which happens to properties around the Swillbrook which runs through the centre of the village. Significant damage has occurred to many houses in the village in recent years both through surface water and raw sewerage. Surface water from the proposed site would make this situation far worse. We must not overlook the fact that many properties around the school and(former) post office green as far up the A429 as The Butts estate already need non-return valves to stay safe from sewerage flooding until the excess over capacity subsides. In addition, sewerage frequently exudes from all the manhole covers around the PO Green in Tuners Lane due to the lack of Pumping Station capacity , even during only moderate rainfall. The Council have been contacted by Hankerton Parish Council expressing their concern over the increase in Sewerage this plan would bring to their own pumping station as it barely copes at present.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2290	Consultee Mr Michael Dennis	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1128249	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.</p> <p>The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5</p> <p>– Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Boundary hedgerows / tree lines • Lambrok Stream <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long- term protection and favourable management in order to secure continued or future use by Bechstein's bats. This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2291	Consultee Mr Al Wright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 871876		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I object to this plan as it fails to allocate sites in accordance with the law and the NPPF PPG that requires sites not following the prescribed process to be refused. This community has at every opportunity provided accurate up to date flood information across the area which the council has decided to ignore. Despite significant floods occurring they chose not to investigate, and despite advice in both the SFRA 1 for the county produced by flood experts and advice provided by the EA that a SFRA 2 is required for warminster, and despite agreeing to do one in the core strategy they have failed to produce the required assessment or use its results to safely allocate sites. There are no Sequential tests and the advice by the planners to this community contradicts the actions taken creating a situation where we the community are prevented from achieving outcomes we wanted and protecting this community from further flooding. [refer to attached report for full representation]				
Attached files (Please see Objective)	4728484				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2292	Consultee Mr Al Wright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 871876		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I object to this plan as it fails to allocate sites in accordance with the law and the NPPF PPG that requires sites not following the prescribed process to be refused. This community has at every opportunity provided accurate up to date flood information across the area which the council has decided to ignore. Despite significant floods occurring they chose not to investigate, and despite advice in both the SFRA 1 for the county produced by flood experts and advice provided by the EA that a SFRA 2 is required for warminster, and despite agreeing to do one in the core strategy they have failed to produce the required assessment or use its results to safely allocate sites. There are no Sequential tests and the advice by the planners to this community contradicts the actions taken creating a situation where we the community are prevented from achieving outcomes we wanted and protecting this community from further flooding. [refer to attached report for full representation]				
Attached files (Please see Objective)	4728484				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2293	Consultee Mr Al Wright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 871876		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I object to this plan as it fails to allocate sites in accordance with the law and the NPPF PPG that requires sites not following the prescribed process to be refused. This community has at every opportunity provided accurate up to date flood information across the area which the council has decided to ignore. Despite significant floods occurring they chose not to investigate, and despite advice in both the SFRA 1 for the county produced by flood experts and advice provided by the EA that a SFRA 2 is required for warminster, and despite agreeing to do one in the core strategy they have failed to produce the required assessment or use its results to safely allocate sites. There are no Sequential tests and the advice by the planners to this community contradicts the actions taken creating a situation where we the community are prevented from achieving outcomes we wanted and protecting this community from further flooding. [refer to attached report for full representation]				
Attached files (Please see Objective)	4728484				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2294	Consultee Orla and Paul Dunn Carder Person ID: 1132219	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note the proposals that are being made to alter existing settlement boundaries in Salisbury, Trowbridge, and other Market towns to develop these areas, with the purpose of ensuring the delivery of houses in Wiltshire's three Market Town areas for the period up to 2026. I strongly object to ANY changes within Warminster to the existing settlement boundaries, and further allocation of new sites for housing, as the selection of sites is not sound.</p> <p>The proposed plan is NOT sound, and I object strongly for the following reasons:</p> <p>Environment and character of the area</p> <p>The proposed change to the settlement boundary at Home farm is a particularly baffling suggestion. This site has already been rejected by the planning inspector, for a great number of reasons, one of which was due the character of the area, the following was stated by the planning inspector</p> <p>"I saw that the land mostly comprises arable fields, with similar fields to the north, together with a few cottages and other houses (some set in trees) and bounded by lanes or roads, to the east, west and south. Although there is urban development immediately to the west (across Grange Lane), the area has a pleasant and obviously rural appearance and is very much on the edge of Warminster. From my observations from local footpaths to the north, west and east of the area and from Battlesbury Hill I consider that the land relates well in visual terms to the open countryside to the north and east, forming an integral part of the countryside east of the town. I accept that a high stone wall and cottages fronting Boreham Road impact on any meaningful visual relationship with the countryside to the south, other than when seen from the Hill top. However, in view of the open-ness of the land and its linkage with other open land to the east and north (and especially Battlesbury Hill), I consider that the town policy limit hereabouts should be drawn along the eastern edge of the denser development fronting The Dene, St George's Close and (the southern part of) Grange Lane."</p> <p>The character of the area has not changed and these comments are still valid.</p> <p>In summary, I strongly object to any change to the housing numbers and settlement boundaries in Warminster, and want my letter to be brought to the attention of the Planning Inspector's examination currently scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2295	Consultee Orla and Paul Dunn Carder Person ID: 1132219	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note the proposals that are being made to alter existing settlement boundaries in Salisbury, Trowbridge, and other Market towns to develop these areas, with the purpose of ensuring the delivery of houses in Wiltshire's three Market Town areas for the period up to 2026. I strongly object to ANY changes within Warminster to the existing settlement boundaries, and further allocation of new sites for housing, as the selection of sites is not sound.</p> <p>The proposed plan is NOT sound, and I object strongly for the following reasons:</p> <p>Wiltshire's Conservation Officer also has grave concerns regarding the impact of development on the Character of the area, and considers the effect on listed buildings and structures in the area, and potentially listable properties in the area. The Conservation Officer also considers it "difficult to see how development of this area would make a positive contribution to local character and distinctiveness".</p> <p>In summary, I strongly object to any change to the housing numbers and settlement boundaries in Warminster, and want my letter to be brought to the attention of the Planning Inspector's examination currently scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2296	Consultee Orla and Paul Dunn Carder	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132219		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note the proposals that are being made to alter existing settlement boundaries in Salisbury, Trowbridge, and other Market towns to develop these areas, with the purpose of ensuring the delivery of houses in Wiltshire's three Market Town areas for the period up to 2026. I strongly object to ANY changes within Warminster to the existing settlement boundaries, and further allocation of new sites for housing, as the selection of sites is not sound.</p> <p>The proposed plan is NOT sound, and I object strongly for the following reasons:</p> <p>Infrastructure The plan has not considered the effect on Warminster's current infrastructure, which is struggling in many areas, for example one of our Doctors' surgeries has recently closed, and it is extremely difficult to get an appointment to see a doctor. This is not the only problematic area, there are many more including (but not limited to) Parking and Education.</p> <p>In summary, I strongly object to any change to the housing numbers and settlement boundaries in Warminster, and want my letter to be brought to the attention of the Planning Inspector's examination currently scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2297	Consultee Orla and Paul Dunn Carder Person ID: 1132219	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note the proposals that are being made to alter existing settlement boundaries in Salisbury, Trowbridge, and other Market towns to develop these areas, with the purpose of ensuring the delivery of houses in Wiltshire's three Market Town areas for the period up to 2026. I strongly object to ANY changes within Warminster to the existing settlement boundaries, and further allocation of new sites for housing, as the selection of sites is not sound.</p> <p>The proposed plan is NOT sound, and I object strongly for the following reasons:</p> <p>Infrastructure</p> <p>The plan only increases the number of houses, and makes no provision for increasing or upgrading the infrastructure of the individual areas. Relying on all residents travelling across the town to use a single service only increases the pressure on roads, and discourages people from walking or cycling. No provision is made for local employment in the plan, and the large employment areas of Bath, and Trowbridge will increase the pressure on roads further still. Currently we have problems in the very narrow streets on the B3414 near the centre of Town.</p> <p>The proposed site access is onto Boreham Road. I consider this to be very dangerous. As a resident of Grange Lane, I know how dangerous and difficult it is currently to exit the lane safely due to the fast movement of traffic in this area including around the proposed entrance area. Having the entrance to the site to the south when the main housing development area is to the north also seems contrary and only inviting further applications for development the south of the area. If you must develop this area, why not consider an entrance directly from the roads near the north of the site of Woodcock Road.</p> <p>In summary, I strongly object to any change to the housing numbers and settlement boundaries in Warminster, and want my letter to be brought to the attention of the Planning Inspector's examination currently scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2298	Consultee Orla and Paul Dunn Carder Person ID: 1132219	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note the proposals that are being made to alter existing settlement boundaries in Salisbury, Trowbridge, and other Market towns to develop these areas, with the purpose of ensuring the delivery of houses in Wiltshire's three Market Town areas for the period up to 2026. I strongly object to ANY changes within Warminster to the existing settlement boundaries, and further allocation of new sites for housing, as the selection of sites is not sound.</p> <p>The proposed plan is NOT sound, and I object strongly for the following reasons: Warminster has a great number of flooding problems at the moment, and it seems that nobody is willing to accept responsibility for managing it. This needs good sound solution to this problem. Home Farm is very wet during periods of heavy rain, and usually has a large pond on it during the winter period. Grange Lane floods regularly. There was a period last year when the Post Office was refusing to deliver letters to some of the properties. Clearly Home Farm is a run off area for water off the high ground to the North of it, and if it were developed the flooding issues will only become worse, with the development potentially increasing the flood risk to existing properties. Boreham Road regularly floods, and with more run off this will become worse.</p> <p>The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA), thereby managing and reducing risk of flooding throughout Wiltshire. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages. This omission may open up the threat of judicial review should the plan progress as it stands.</p> <p>In summary, I strongly object to any change to the housing numbers and settlement boundaries in Warminster, and want my letter to be brought to the attention of the Planning Inspector's examination currently scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2299	Consultee Orla and Paul Dunn Carder Person ID: 1132219	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note the proposals that are being made to alter existing settlement boundaries in Salisbury, Trowbridge, and other Market towns to develop these areas, with the purpose of ensuring the delivery of houses in Wiltshire's three Market Town areas for the period up to 2026. I strongly object to ANY changes within Warminster to the existing settlement boundaries, and further allocation of new sites for housing, as the selection of sites is not sound.</p> <p>The proposed plan is NOT sound, and I object strongly for the following reasons:</p> <p>The increase in the allocation seems to be made as a contingency plan to the existing sound, and well considered delivery plan failing to meet the requirements for the 2026 figures. It seems an overreaction to change settlement boundaries, encouraging development of green field sites when the chances are that the existing plan will deliver the required housing and infrastructure that is required for this housing. The existing site at the West Urban Extension could have its allocation increased to cover this shortfall, and this way all of the issues regarding infrastructure etc will not pose problems. The sound existing plan for the West Urban extension, which was subject to careful consideration to deliver the housing to 2026 was considered sound by a planning inspector previously. Whilst we have some concerns about the negative impact of further development on the West side of town, this has the support of local councilors and as they have been recently reelected, presumably the local population there.</p> <p>In summary, I strongly object to any change to the housing numbers and settlement boundaries in Warminster, and want my letter to be brought to the attention of the Planning Inspector's examination currently scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2300	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Overall Planning Policy</p> <p>The Westbury Topic Paper of the Plan states that the number of dwellings in Bratton is 819. The actual number is 516 some 38% fewer than the number stated. The figure for Housing Completions 2006 – 2016 is stated as 20 whereas the reality is more like 8 so this figure too is grossly overstated. So the starting point for the plan is clearly wrong. These inaccurate numbers casts doubt on the other figures in the Plan.</p> <p>The Core Strategy states</p> <p>Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.</p> <p>This proposal satisfies none of these requirements</p> <p>The Housing Needs survey identified a need for 8 properties yet the Plan proposes 40. So clearly the land is not being allocated to meet the needs of the Bratton community.</p> <p>At para 2.15 of the Plan the following appears</p> <p>Development (within large villages) limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities</p> <p>This proposal is contrary to this key core policy.</p> <p>The over-development proposed at the site is urbanisation within a village context and totally inappropriate and is not aimed at meeting 'the housing needs of the settlement'.</p> <p>Page 22 of the Core Strategy, para 4.15 states</p> <p>At the settlements identified as villages, a limited level of development will be supported in order to help retain the vitality of these communities. At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries.....Small housing site are defined as sites involving fewer than 10 dwellings</p> <p>This is not a small housing site of the type envisaged by the Core Strategy, rather a major proposal introduced without any discussion with the local community. This proposal is in breach of this strategic statement.</p> <p>The Core Strategy statement continues</p> <p>Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement boundary to identify new developable land to help meet the housing and employment needs of that community. In turn this could bring forward benefits to the local community such as improvements to the economy through the identification of land for employment purposes.</p> <p>The Parish Council, elected in May, has committed itself to developing a neighbourhood plan and this surely is the proper vehicle for identifying the housing needs of the village rather than allowing them to be blighted by an unneeded development just to satisfy the need to find somewhere</p>				

to put 40 houses to meet a theoretical Government target. The Parish Council response recorded in the Plan is no longer its position as it is clear from an analysis of the planning policy that significant residential development on this site is inappropriate. In summary, it is clear that the allocation of Site 321 satisfies none of the requirements of the Core Strategy approved in 2015. The Council's Core Strategy confirms that developments of this nature are inappropriate in a village the size of Bratton. Dropping a development on an urban scale on the edge of the village is clearly insensitive to the village.

We have calculated that Site 321 is 12,529m². That is 313m²/property. Manor Fields, the only other major housing development in the village, has an area of 26,057m². With its 66 houses, that's 395m²/property. Even at this density residents' car parking is a major problem.

If Manor Fields was built at 313m²/property it would be the equivalent of building 83 houses i.e. squeezing an additional 17 houses into the land, an additional 34 cars or more. This density of development is clearly unsuitable for a rural village.

The combined effect of these policies must mean that the level of development in a Large Village such as Bratton must be no greater than can fit within the village without causing it to impact on the wider hinterland of the area, in terms of needing jobs and relying on services and local shops. An allocation of approximately 40 houses is of a size suitable for placing at a Local Service Centre such as Market Lavington or a town such as Westbury rather than Bratton and the Core Strategy specifically states at paragraph 4.14 that Local Service Centres should provide for local employment opportunities, improved community facilities and/or affordable housing, and in the same manner paragraph 2.15 of the Plan stipulates that Local Service Centres should provide modest levels of development to safeguard their role and deliver affordable housing. Nor is the Plan effective since there is no prospect of employment opportunities being generated in the village to require such a significant development. Whilst we recognise national policy requires the Council to make appropriate housing allocations Site 321 does not meet wider Government priorities relating to the development of sustainable housing, reduction in transport and protection of the countryside.

To remedy this the review must take into consideration a wide range of national policies and Wiltshire Council's own Core Strategy. Better account must be taken of a wide range of other factors including

Highways where the topic paper understates the busyness of the B3098

The quality of the environment as the site sits in a Special Landscape Area

The quality of the land as the site concerned consists of agricultural land of the highest quality

There is an alternative site within the settlement boundary in the ownership of the Parish Council. The Council has resolved to investigate its potential to meet the housing needs of the village.

We would propose that Wiltshire Council withdraw Site 321 from the Housing Allocations Plan and work with the Parish Council to develop the alternative site which we estimate could provide some 15 homes.

West Wiltshire District Council refused planning consent for a smaller development of 23 houses on Site 321 in 1994. Bratton has ensured that affordable housing has been built since then, particularly at Pear Tree Orchard, and it is smaller developments such as this, which are suitable for the size of the village.

This letter contains the issues considered by the Council in reaching its decision to object to the allocation of Site 321 for housing in Bratton. The Clerk passed on the Council's decision in a letter sent to you by email on 14 September and subsequently confirmed in an email of 18 September that the Chair and vice-Chair would be submitting a supplementary paper expanding on the reasons for this decision. See also Comment IDs: 699-705.

For the record we think it is extremely optimistic to expect lay people to have the expertise to respond in the detail required but, thanks to the vice-Chair, the Council has researched the planning policy background to this allocation and we are extremely disappointed by what we have discovered.

I trust the above satisfies the requirements of the questions demonstrating why the Council question the legality and soundness of the Plan and why it considers it to be improperly prepared, unjustified, ineffective and not in accordance with national policy.

In closing we would like to re-iterate our concern about the nature of the consultation exercise. It was launched in July over the main holiday period, when most Parish and Town councils are in recess. This was compounded by a complex form for individuals to respond to, a portal on the internet which was difficult to access and a complete lack of contact with the community. This has led to widespread irritation in the village.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Finally the Council will wish to participate at the oral examination of the Plan. We consider it necessary to ensure that those sitting in judgement of the Plan have a full appreciation of our concerns relating to the reasoning contained in the Topic Paper which led to the inclusion of Site 321.

Comment ID:	2301	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Landscape policy</p> <p>Turning now to landscape considerations the Core Strategy states that Policy C3 Special Landscape Areas (SLA) is a saved policy from the West Wiltshire District Plan. Site 321 is within the SLA. That Policy C3 states</p> <p>The landscape character of SLAs will be conserved and enhanced and development will not be permitted which is considered to be detrimental to the high quality of these landscapes.</p> <p>Proposals for development essential to the social and economic well-being of the rural communitywill be permitted having regard to other material planning considerations</p> <p>This proposal is contrary to this policy statement as the housing proposed is not 'essential' to the well-being of the rural community of Bratton</p> <p>Core Policy 51 is also relevant in this case not least owing to the designation of the area as SLA 13. This policy states</p> <p>Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character....Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character areas identified in the Landscape Character Assessment(s) and any other relevant assessments and studies.</p> <p>The development proposed of 40 houses is in direct conflict with this policy.</p> <p>The Core Strategy at 6.80 identifies the Wiltshire District Landscape Character Assessment. The key section of this assessment is section 4.0. These requirements relating to the Bratton and Edington Chalk Terrace state</p> <p>The overall strategy for the area is to conserve the generally intact landscape and settlement pattern with small villages nestling at the bottom of the Chalk Downland...Specific management objectives are to</p> <p>Seek to resist any development that would affect the open views across the terrace to the chalk uplands</p> <p>Conserve ... the existing field pattern</p> <p>Conserve the existing small scale settlement pattern and avoid larger developments that would be out of scale and character.</p> <p>This proposal is in direct conflict with this policy.</p> <p>The Inherent Landscape Sensitivities for the area G2 (Westbury Greensand and Chalk Terrace) in which the proposed site lies are listed as</p> <p>Surviving hedgerow network</p> <p>Open views to dramatic Chalk Downland Edge</p> <p>Open views to Westbury White Horse as a dramatic landscape feature</p> <p>Strong sense of tranquility throughout the character area</p> <p>Development of this site within that landscape is at odds with the requirements of this policy</p> <p>The Specific Management Objectives for G2 are</p> <p>Seek to resist any development that would affect the open views across the terrace to the chalk uplands</p> <p>Conserve open views to the Westbury White Horse as a distinctive landmark</p>				

	<p>Conserve the existing sparse settlement pattern and avoid larger developments that would be out of scale and character within the existing situation</p> <p>The proposal, therefore to develop this lowland landscape has a potential detrimental impact on this important Chalkland Edge landscape. To screen the development with trees shows a lack of understanding of the landscapes in this area.</p> <p>To remedy this the review must take into consideration a wide range of national policies and Wiltshire Council's own Core Strategy. Better account must be taken of a wide range of other factors including</p> <p>Highways where the topic paper understates the busyness of the B3098</p> <p>The quality of the environment as the site sits in a Special Landscape Area</p> <p>The quality of the land as the site concerned consists of agricultural land of the highest quality</p> <p>There is an alternative site within the settlement boundary in the ownership of the Parish Council. The Council has resolved to investigate its potential to meet the housing needs of the village.</p> <p>We would propose that Wiltshire Council withdraw Site 321 from the Housing Allocations Plan and work with the Parish Council to develop the alternative site which we estimate could provide some 15 homes.</p> <p>West Wiltshire District Council refused planning consent for a smaller development of 23 houses on Site 321 in 1994. Bratton has ensured that affordable housing has been built since then, particularly at Pear Tree Orchard, and it is smaller developments such as this, which are suitable for the size of the village.</p> <p>This letter contains the issues considered by the Council in reaching its decision to object to the allocation of Site 321 for housing in Bratton. The Clerk passed on the Council's decision in a letter sent to you by email on 14 September and subsequently confirmed in an email of 18 September that the Chair and vice-Chair would be submitting a supplementary paper expanding on the reasons for this decision.</p> <p>See also Comment IDs: 699-705.</p> <p>For the record we think it is extremely optimistic to expect lay people to have the expertise to respond in the detail required but, thanks to the vice-Chair, the Council has researched the planning policy background to this allocation and we are extremely disappointed by what we have discovered.</p> <p>I trust the above satisfies the requirements of the questions demonstrating why the Council question the legality and soundness of the Plan and why it considers it to be improperly prepared, unjustified, ineffective and not in accordance with national policy.</p> <p>In closing we would like to re-iterate our concern about the nature of the consultation exercise. It was launched in July over the main holiday period, when most Parish and Town councils are in recess. This was compounded by a complex form for individuals to respond to, a portal on the internet which was difficult to access and a complete lack of contact with the community. This has led to widespread irritation in the village.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Finally the Council will wish to participate at the oral examination of the Plan. We consider it necessary to ensure that those sitting in judgement of the Plan have a full appreciation of our concerns relating to the reasoning contained in the Topic Paper which led to the inclusion of Site 321.</p>

Comment ID:	2302	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Sustainability Appraisal</p> <p>A Sustainability Appraisal is an obligatory part of the development process and must be published when a Plan is made. This has been done in this case. However, the conclusions of the Appraisal in the consideration of Site 321 in Bratton should be subject to critical examination: Objective 2 has an objective of ensuring efficient and effective use of land and the use of suitably located previously developed land and buildings. The land at Site 321 is agricultural land and is described as BMV (Best and Most Versatile) Land. No part of the land is previously used land. The land is part of a Special Landscape Area. Yet the scoring in the answer is one negative, on the basis that there is a minor adverse effect and mitigation measures are readily available. On any reasonable interpretation the loss of the best form of land with a site which has no brownfield land at all must rank an higher adverse rating than a single negative. The mitigation measure is to increase the number of houses from the number originally designated as the appropriate amount, but again if the appropriate number of houses at a site is 32 increasing it by 25% again to make 40 houses is unreasonable and results in over development. It disregards all planning policy as to how many houses should be located at Bratton as a Large Village. It renders any arguments about needs for the village and the community irrelevant. It is increased without any regard to the local infrastructure, medical care, transport, road safety and road capacity and the capacity of the site to provide sufficient parking for residents and friends. It ignores the capacity of the village to improve employment opportunities. Objective 12 relates to employment with an objective of ensuring adequate provision of high quality employment land and diverse opportunities to meet the needs of local businesses and a changing work force. The answer is a single positive. Yet in a case where no employment land is being provided at all it seems unreasonable to give a positive answer at all, rather a negative should be given. Objective 8 relates to the provision of housing: ensuring everyone with the opportunity to live in good quality, affordable housing and ensure an appropriate mix of dwelling sizes, types and tenures. This is answered with a triple positive. No other objective is answered with a triple sign, apart from this. All are answered in the negative except Objectives 8, 11 and 12. In terms of the needs of the village this triple answer may be unreasonable. The housing will be dense as approximately 40 will be fitted on the site. The presumption used is 30 houses per hectare with only two storey houses maximum. Housing in Bratton is expensive and the same housing in Westbury would provide greater affordability for a wider band of private purchasers. The affordable housing will be available for all residents in the region and not necessarily the children of residents in Bratton or the local area or others with a local need. Likewise with Objective 11 on encouraging a vibrant and diversified economy, two positives have been given to this objective. Objective 9 on the aim to reduce poverty and deprivation and to promote more inclusive and self-contained communities scores a single negative. Perhaps a double negative would be more appropriate considering the location and infrastructure of the village. To remedy this the review must take into consideration a wide range of national policies and Wiltshire Council's own Core Strategy. Better account must be taken of a wide range of other factors including Highways where the topic paper understates the busyness of the B3098 The quality of the environment as the site sits in a Special Landscape Area</p>				

	<p>The quality of the land as the site concerned consists of agricultural land of the highest quality There is an alternative site within the settlement boundary in the ownership of the Parish Council. The Council has resolved to investigate its potential to meet the housing needs of the village. We would propose that Wiltshire Council withdraw Site 321 from the Housing Allocations Plan and work with the Parish Council to develop the alternative site which we estimate could provide some 15 homes. West Wiltshire District Council refused planning consent for a smaller development of 23 houses on Site 321 in 1994. Bratton has ensured that affordable housing has been built since then, particularly at Pear Tree Orchard, and it is smaller developments such as this, which are suitable for the size of the village. This letter contains the issues considered by the Council in reaching its decision to object to the allocation of Site 321 for housing in Bratton. The Clerk passed on the Council's decision in a letter sent to you by email on 14 September and subsequently confirmed in an email of 18 September that the Chair and vice-Chair would be submitting a supplementary paper expanding on the reasons for this decision. See also Comment IDs: 699-705. For the record we think it is extremely optimistic to expect lay people to have the expertise to respond in the detail required but, thanks to the vice-Chair, the Council has researched the planning policy background to this allocation and we are extremely disappointed by what we have discovered. I trust the above satisfies the requirements of the questions demonstrating why the Council question the legality and soundness of the Plan and why it considers it to be improperly prepared, unjustified, ineffective and not in accordance with national policy. In closing we would like to re-iterate our concern about the nature of the consultation exercise. It was launched in July over the main holiday period, when most Parish and Town councils are in recess. This was compounded by a complex form for individuals to respond to, a portal on the internet which was difficult to access and a complete lack of contact with the community. This has led to widespread irritation in the village.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Finally the Council will wish to participate at the oral examination of the Plan. We consider it necessary to ensure that those sitting in judgement of the Plan have a full appreciation of our concerns relating to the reasoning contained in the Topic Paper which led to the inclusion of Site 321.</p>

Comment ID:	2303	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Landscape assessment At Stage 4a of the Process a Landscape Assessment was carried out. This Field Study highlights the two Public Footpaths running over the site. The Landscape character is described as "Pleasant". This is understated in the Council's opinion. The remoteness and tranquillity judgement is given as "Peaceful", but this is not correct. The B3098 although a B road is the main road leading through from Westbury to the east to West Lavington and on to Pewsey, Devizes and south to Salisbury and Andover. Much traffic passing from the Westbury direction and travelling to Devizes, Calne and Melksham use the B3098 from Westbury to Bratton to cut north and avoid the roundabout and delays at Yarnbrook. Statistical evidence is not available on this. The assessment states The B3098 Westbury Road does not appear to be a particularly busy road and the landscape at the western edge has an exposed and remote feel. Overall the site and immediate landscape context is peaceful. This is not the view of residents who have to drive out on to the road or use the road at its narrow points. As long ago as 2007 in the West Wiltshire District Council Landscape Character Assessment referred to above in the section for the Bratton & Edington Greensand and Chalk Terrace, it was noted as a Key Landscape Change there was Increasing commuter traffic along the B3098. To remedy this the review must take into consideration a wide range of national policies and Wiltshire Council's own Core Strategy. Better account must be taken of a wide range of other factors including Highways where the topic paper understates the busyness of the B3098 The quality of the environment as the site sits in a Special Landscape Area The quality of the land as the site concerned consists of agricultural land of the highest quality There is an alternative site within the settlement boundary in the ownership of the Parish Council. The Council has resolved to investigate its potential to meet the housing needs of the village. We would propose that Wiltshire Council withdraw Site 321 from the Housing Allocations Plan and work with the Parish Council to develop the alternative site which we estimate could provide some 15 homes. West Wiltshire District Council refused planning consent for a smaller development of 23 houses on Site 321 in 1994. Bratton has ensured that affordable housing has been built since then, particularly at Pear Tree Orchard, and it is smaller developments such as this, which are suitable for the size of the village. This letter contains the issues considered by the Council in reaching its decision to object to the allocation of Site 321 for housing in Bratton. The Clerk passed on the Council's decision in a letter sent to you by email on 14 September and subsequently confirmed in an email of 18 September that the Chair and vice-Chair would be submitting a supplementary paper expanding on the reasons for this decision. See also Comment IDs: 699-705.</p>				

	<p>For the record we think it is extremely optimistic to expect lay people to have the expertise to respond in the detail required but, thanks to the vice-Chair, the Council has researched the planning policy background to this allocation and we are extremely disappointed by what we have discovered.</p> <p>I trust the above satisfies the requirements of the questions demonstrating why the Council question the legality and soundness of the Plan and why it considers it to be improperly prepared, unjustified, ineffective and not in accordance with national policy.</p> <p>In closing we would like to re-iterate our concern about the nature of the consultation exercise. It was launched in July over the main holiday period, when most Parish and Town councils are in recess. This was compounded by a complex form for individuals to respond to, a portal on the internet which was difficult to access and a complete lack of contact with the community. This has led to widespread irritation in the village.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Finally the Council will wish to participate at the oral examination of the Plan. We consider it necessary to ensure that those sitting in judgement of the Plan have a full appreciation of our concerns relating to the reasoning contained in the Topic Paper which led to the inclusion of Site 321.</p>

Comment ID:	2304	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Bratton Parish Council Person ID: 1125770		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Turning to the settlement boundary you can see from the recommendation above the Council, with one small addition do not wish to see the expansion of the settlement boundary. Particular concern was expressed at the southern extension of the village. Members felt that extending that boundary may encourage owners of large Victorian and Georgian houses to seek permission to develop their gardens for housing. To remedy this the review must take into consideration a wide range of national policies and Wiltshire Council's own Core Strategy. Better account must be taken of a wide range of other factors including Highways where the topic paper understates the busyness of the B3098</p> <p>The quality of the environment as the site sits in a Special Landscape Area</p> <p>The quality of the land as the site concerned consists of agricultural land of the highest quality</p> <p>There is an alternative site within the settlement boundary in the ownership of the Parish Council. The Council has resolved to investigate its potential to meet the housing needs of the village.</p> <p>We would propose that Wiltshire Council withdraw Site 321 from the Housing Allocations Plan and work with the Parish Council to develop the alternative site which we estimate could provide some 15 homes.</p> <p>West Wiltshire District Council refused planning consent for a smaller development of 23 houses on Site 321 in 1994. Bratton has ensured that affordable housing has been built since then, particularly at Pear Tree Orchard, and it is smaller developments such as this, which are suitable for the size of the village.</p> <p>This letter contains the issues considered by the Council in reaching its decision to object to the allocation of Site 321 for housing in Bratton. The Clerk passed on the Council's decision in a letter sent to you by email on 14 September and subsequently confirmed in an email of 18 September that the Chair and vice-Chair would be submitting a supplementary paper expanding on the reasons for this decision.</p> <p>See also Comment IDs: 699-705.</p> <p>For the record we think it is extremely optimistic to expect lay people to have the expertise to respond in the detail required but, thanks to the vice-Chair, the Council has researched the planning policy background to this allocation and we are extremely disappointed by what we have discovered.</p> <p>I trust the above satisfies the requirements of the questions demonstrating why the Council question the legality and soundness of the Plan and why it considers it to be improperly prepared, unjustified, ineffective and not in accordance with national policy.</p> <p>In closing we would like to re-iterate our concern about the nature of the consultation exercise. It was launched in July over the main holiday period, when most Parish and Town councils are in recess. This was compounded by a complex form for individuals to respond to, a portal on the internet which was difficult to access and a complete lack of contact with the community. This has led to widespread irritation in the village.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Finally the Council will wish to participate at the oral examination of the Plan. We consider it necessary to ensure that those sitting in judgement of the Plan have a full appreciation of our concerns relating to the reasoning contained in the Topic Paper which led to the inclusion of Site 321.

Comment ID:	2305	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>Dolphin Farms Ltd do not support Policy H3 insofar as allocations at Netherhampton Road should be deleted for reasons given in response to Policy H3.1. It is proposed that land North of The Partway (SHLAA Site S80) should be considered as a more sustainable location for growth that can be delivered in the plan period. This would contribute to replacing some of the above housing provision upon which Policy H3.1 is reliant.</p> <p>The land to the North of The Partway is well placed to accommodate growth in order to meet local housing needs and help sustain the new community at Old Sarum/Longhedge. The land is well related to the existing development, with direct access to the highway network and in single ownership. The land is available for development and a range of survey and assessment work has commenced to inform the master planning of the site.</p> <p>Old Sarum was originally open fields surrounding an isolated estate of around 70 social houses, although the Old Sarum Airfield business park was operational directly to the south and various other commercial uses, including the Park & Ride facility were in the vicinity. Land was originally allocated in the Salisbury District Local Plan (2004) for mixed use development including housing, employment, retail, education, recreation and community uses. Outline Planning Permission was granted in June 2007 for mixed use development with 630 dwellings, but with areas reserved for post 2011 development. Consequently, there have been consents for an additional 180 dwellings within the boundaries of the site. The residential estate extends to part of the south western boundary of site S80 with the remaining boundary adjoining public open space forming part of the Old Sarum development.</p> <p>A further mixed use development was allocated on land between the Old Sarum development and the A345, known as 'Longhedge'. This was allocated in the South Wiltshire Core Strategy for 450 dwellings and 8 hectares Employment. Subsequently outline planning permission was granted for a mixed use development comprising 673 dwellings, Employment Uses (B1, B2, B8), Neighbourhood Centre, Primary School, Public Open Space and access to the A345. The development is currently under construction, with Old Sarum completed and a Local Centre recently developed with access directly onto The Partway.</p> <p>Thus, over a period of 10 years or so, the Local Planning Authority has developed a strategy which has focussed development at Old Sarum, with the objective of a new community with a high level of self containment whilst having good public transport links to the city centre. Site S80 is well located in relation to the mixed use developments at both sites. Its south western boundary adjoins the northern phases of housing within the Old Sarum development, including as area of parkland along approximately half of the boundary. Its north western boundary adjoins the Longhedge development albeit that the adjoining area is also proposed for parkland. Site 690 and the Longhedge site are both contained by the Monarch's Way bridleway.</p> <p>A Context Plan is provided at Appendix A to this representation.</p>				

	<p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Partway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Partway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRoW.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>
<p>Attached files (Please see Objective)</p>	<p>4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.</p>

Comment ID:	2306	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>Site Selection Process</p> <p>The Site Selection Process Methodology is set out in the Salisbury Area Topic Paper, June 2017. Land to the North of The Portway Site S80 did not progress to Stage 4 of the site selection process by reason of having 5 or more of the SA objectives recorded as "moderate adverse effects".i.e. where "mitigation is likely to be difficult or problematic." (A "minor adverse effects" rating is where "mitigation measures are readily achievable.")</p> <p>Dolphin Farms Ltd have commissioned several preliminary assessments to guide the master planning of the site and respond to some of the assumptions inherent in the Council's recorded assessment scales for the site.</p> <p>The allocation has essentially not been advanced based on "moderate adverse effect" being recorded against the following six SA objectives.</p> <p>Obj 1. "Protect and enhance all biodiversity and geological features and avoid irreversible losses"</p> <p>This rating appears to apply to all site options on the basis that the HRA screening assessment has identified that development at the settlement could contribute towards impacts upon the River Avon SAC through increased water abstraction, increased phosphate loading and habitat loss/damage. However, there is no embargo on development and for this to form basis of "moderate adverse effect" for all sites does not provide a meaningful comparison between the site options of any biodiversity constraints ..</p> <p>Dolphin Farms Ltd commissioned a Preliminary Ecological Appraisal which is provided as Appendix B.</p> <p>The vast majority of the site (arable) comprises land of negligible I low ecological value. Subject to a sensitively designed development scheme, implemented with suitable avoidance, mitigation and compensation measures, it is considered that there are no overriding ecological constraints to the future development of the site. On the contrary, the opportunity exists to provide a number of net gains in biodiversity as part of the development of the site.</p> <p>On the basis of the findings of the report the rating should reasonably change to "minor adverse effect."</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Portway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Portway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local</p>				

	<p>services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRow.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>
Attached files (Please see Objective)	4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.

Comment ID:	2307	Consultee Dolphin Farms Ltd	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132344	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>Obj 2. "Effective and efficient use of land and use of suitably located PDL"</p> <p>The assessment summary (page 57) appears to indicate that the loss of greenfield land should equate to a "minor adverse effect", which is not consistent with the recorded rating on Table F.3 or with that accorded to other sites e.g. Site S1027.</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Portway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Portway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRoW.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>			
Attached files (Please see Objective)		4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.			

Comment ID:	2308	Consultee Dolphin Farms Ltd	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132344	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>Obj 3. "Use and Manage Water Resources in a sustainable manner"</p> <p>Once again this appears to apply to all site options on the basis of falling within the catchment of the Hampshire Avon and in a high risk catchment for phosphate loading.</p> <p>A preliminary Drainage Appraisal is provided as Appendix C. This advises that adverse effects on groundwater can readily be mitigated by most sustainable surface water management arrangements.</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Partway (Site S90) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Partway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRow.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>				
Attached files (Please see Objective)	4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.				

Comment ID:	2309	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>Obj 6. "Protect, Maintain and Enhance Historic Environment"</p> <p>Dolphin Farms Ltd commissioned a preliminary heritage assessment to consider the potential impact and mitigation for designated heritage assets and potential archaeological interest., which is attached as Appendix D. Similar consideration of course applied to the adjoining developments and indeed Old Sarum would have had a greater impact on the adjacent Old Sarum Airfield conservation area.</p> <p>The review of heritage resources has identified below-ground archaeological remains within the site, specifically prehistoric below-ground remains associated with barrows, ditches and part of a large enclosure located within the site. The assessment has also identified intervisibility with two designated heritage assets, namely the Scheduled Monuments Ende Burgh and Old Sarum. However, with appropriate design, including appropriate use of open space, the recorded heritage resource is not considered to preclude development across the site as a whole. With appropriate design, adverse impacts to Ende Burgh and Old Sarum Scheduled Monuments would not exceed less than substantial harm, at the lower end of this spectrum. Development which includes for open space at the south eastern area of the site/adjacent to the centre of the south-western boundary, would allow for preservation in situ of remains in these areas..</p> <p>It is not considered that development would result in any notable adverse impacts on the significance of the Old Sarum Airfield Conservation Area, which principally drives its significance from the illustrative value as a WW1 airfield.</p> <p>On the basis of the summary heritage assessment mitigation measures are clearly identified and achievable. The rating should be changed to "minor adverse effects."</p> <p>It is also noted that the allocated site 1028 at Netherhampton Road is recorded as "minor adverse effects" when it also has recognised high potential for archaeological significance.</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Partway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Partway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRoW.</p>				

	Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.
Attached files (Please see Objective)	4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.

Comment ID:	2310	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3 SALISBURY			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>Obj 7. "Conserve and enhance character and quality of rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place"</p> <p>Dolphin Farms Ltd have commissioned a Preliminary Landscape and Visual Appraisal which is provided as Appendix E.</p> <p>In terms of landscape elements and features, the Site comprises a single, large arable field bordered by a minor road, existing housing development, a tall line of generally dense vegetation and gappy hedgerow vegetation along the Monarch's Way bridleway. Whilst development of parts of the site would inevitably result in the loss of the existing arable field, neither the arable fields nor the vegetation which largely defines the field boundaries are uncommon in the surrounding landscape. Any proposed development would create the opportunity to provide enhancements to the existing landscape structure, ensuring the retention of valued features and elements in the longer term, as well as providing additional biodiversity and green infrastructure benefits as recommended in the published landscape policy and guidance.</p> <p>There are limited places from where the existing site is visible. Where it can be seen, it is frequently seen in the context of existing built form such as the recently constructed housing development adjacent to the its south-western boundary.</p> <p>Proposed development would have a minimal effect on the view from the outer edges the Old Sarum hillfort, due to the context of existing built form which partially screens the site. The principal short range views towards the Site are from the Monarch's Way, The Partway minor road and from the adjoining housing. Publicly accessible views from these locations are limited to areas in close proximity to the site and typically feature clear views of the recent housing development adjacent to the south-western boundary of the Site. The low level existing vegetation along the edge of the recent housing development does little to visibly soften the transition between the housing and the wider countryside. Development of the Site would, necessarily, add to the extent of housing within the views. However, sensitive design of tree and hedgerow planting along the Partway edge and along the Monarch's Way would help to filter views both of the raw edge of the existing of housing development and the proposed housing.</p> <p>Recommendations have also been made to set back proposed built form from both The Partway frontage and along the Monarch's Way and this has been incorporated into the conceptual masterplan for the Site. These measures would help to limit the visual impact both in short range and long range views towards the site. They would also help to preserve the view from the Monarch's Way towards the hillfort at Old Sarum.</p> <p>In conclusion, following analysis of landscape and visual considerations relating to the Site and the surrounding area, a series of design mitigation measures have been proposed and incorporated into the conceptual masterplan for the site to limit its potential landscape and visual effects. This design is clearly at a formative stage and there would be scope to strengthen green infrastructure and landscaping if necessary. The</p>			

	<p>appraisal concludes that residential development could successfully be accommodated without unacceptable effects on landscape character or visual amenity.</p> <p>On the basis of the heritage assessment mitigation measures are clearly identified and achievable. The rating should be changed to "minor adverse effects."</p> <p>It is also noted that the allocated site 1028 at Netherhampton Road is recorded as "minor adverse effects" when it has recognised high landscape impact which can be argued to be significantly greater than site S80 .</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Partway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Partway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRoW.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>
<p>Attached files (Please see Objective)</p>	<p>4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.</p>

Comment ID:	2311	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes																		
				Do you consider the draft WHSAP is sound?	No																		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared																			
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified																			
				Effective																			
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>Obj 9. "Reduce poverty and deprivation and promote more inclusive and self-contained communities."</p> <p>The rating of "moderate adverse impact" for this objective is curious and contradicts the Summary SA, which indicates a "moderate positive effect" as the development will increase the population and contribute to the economy through use of local shops and services (Obj 11). This must therefore also surely contribute to self-containment of the community at Old Sarum/Longhedge.</p> <p>From the SA Summary the "moderate adverse effect" rating appears to be based upon the misguided assumption that a new primary school would be required which could not be provided based on the relatively limited scale of development..</p> <p>However, informal discussion with the Education Authority has indicated that the pupils generated by the new housing would help sustain the existing and planned schools, rather than require new provision as is the case with other proposed allocations in the plan. The primary school provision can be summarised as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">PUPILS</th> <th style="text-align: center;">SCHOOL CAPACITY</th> </tr> </thead> <tbody> <tr> <td>OLD SARUM</td> <td style="text-align: center;">250 (810 x 0.31)</td> <td style="text-align: center;">420</td> </tr> <tr> <td>LONGHEDGE</td> <td style="text-align: center;">208 (673 x 0.31)</td> <td style="text-align: center;">420</td> </tr> <tr> <td>SITE 690</td> <td style="text-align: center;">108 (350 x 0.31)</td> <td style="text-align: center;">-</td> </tr> <tr> <td>TOTAL</td> <td style="text-align: center;">566</td> <td style="text-align: center;">840</td> </tr> <tr> <td>274 SURPLUS</td> <td></td> <td></td> </tr> </tbody> </table>					PUPILS	SCHOOL CAPACITY	OLD SARUM	250 (810 x 0.31)	420	LONGHEDGE	208 (673 x 0.31)	420	SITE 690	108 (350 x 0.31)	-	TOTAL	566	840	274 SURPLUS		
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TOTAL	566	840																					
274 SURPLUS																							

	<p>It is understood that the above standard assessment of school pupil yields is not currently reflected in reality because pupils are coming to the Old Sarum Primary School from elsewhere in the city..</p> <p>However, this cannot be sustainable in the long term and in any case there is concern that the Longhedge Primary School will require additional pupils to be sustainable. In any case there is clearly potential to accommodate pupils from additional housing in the vicinity.</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Partway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Partway at Old Sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRoW.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>
<p>Attached files (Please see Objective)</p>	<p>4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.</p>

Comment ID:	2312	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>Sustainable Location</p> <p>The presumption in favour of sustainable development is at the heart of the NPPF, with a core planning principle being that plan making should: "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."</p> <p>The developments of Old Sarum and Longhedge have not been planned comprehensively. Old Sarum has provided a primary school at a relatively early stage, which has since been extended to a 2FE school. There is a playing field delivered as part of MOD land redevelopment and children's play areas. A local centre has now been provided with an anchor store and small retail units. Land is reserved for a doctor's surgery. A similar level of facilities is planned for the Longhedge development although it remains to be seen if this is effectively delivered within the terms of the S106.</p> <p>Pegasus has previously been involved with the planning of the Old Sarum development, both the original allocation and the subsequent applications for additional housing. The need for services and facilities to come forward and be sustained at a reasonable level has been self evident from engagement with the local community on these applications. The provision of public open space is a key objective locally and the development of site S80 would create the opportunity for a strategic recreational green corridor linking the two developments and their respective open spaces.</p> <p>There have been various studies relating to catchments to sustain local services and facilities, which will very much depend upon the circumstances. All recognise that increasing customer choice and mobility means people are less likely to use local facilities and thus the population needed to support local services is tending to increase. The relative isolation of Old Sarum from the city, notwithstanding a good public transport service, has meant that delivery of local services and facilities are a key issue for the local community. The provision of about 350 new homes immediately within the vicinity of the developing community will sustain key services and facilities.</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Partway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Partway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local</p>				

	<p>services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRow.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>
<p>Attached files (Please see Objective)</p>	<p>4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.</p>

Comment ID:	2313	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80</p> <p>A transport Statement is provided at Appendix F which further demonstrates the sustainability of the location for further housing in terms of proximity to local facilities and public transport links.</p> <p>In terms of traffic impact the report refers to the two sites which have been included within the draft WHSAP are the site S1027 and S1028 off Netherhampton Road. These sites have been considered by the Council more sustainable than S80. However, the Netherhampton Road sites are located in an area already noted in the council's Transport Model Forecasting report as having two key access junctions which are highway hotspots, these are Harnham Gyratory and Park Wall Junction. Any development to this area would impact severely on these two junctions which are already over capacity in peak periods.</p> <p>S80 is in a preferable location for development as the main junction affected, Castle Roundabout is not recognised as being a highway hotspot, and therefore it could cope with an increase in traffic.</p> <p>In conclusion, on the basis of the appended assessments Pegasus consider that the criteria for the site Selection process has been misapplied and underestimated the capability for effective mitigation for developments at Site S80. At the most only 2 of the SA objectives could be rated as "moderate adverse effects" and the site should be reconsidered for selection on this basis.</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Partway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Partway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRoW.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>				
Attached files (Please see Objective)	4728525 / 4728522 / 4728517 / 4728520 / 4728519 / 4728518 / 4728521				

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.

Comment ID:	2314	Consultee Dolphin Farms Ltd	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132344	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3 SALISBURY		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORTS: Appendix A - Context Plan S80, Appendix B - Ecological Appraisal S80, Appendix C - Drainage Appraisal S80, Appendix D - Heritage Appraisal S80, Appendix E - Landscape and Visual Assessment S80, Appendix F - Transport Statement S80, Appendix G - Concept Plan S80 Concept Plan</p> <p>The various environmental appraisal referred to above and appended to these representations have informed a preliminary concept plan for Site S80, which is included as Appendix G. This indicates a developable area of about 10 hectares, from which an estimated capacity of 350 dwellings is derived, although this could vary depending on the outcome of the more detailed design process.</p> <p>Dolphin Farms Ltd consider that land at Netherhampton Road (Sites 1027 and 1028) should be deleted from Policy H3 for reasons given in response to the Policy H3.1.</p> <p>Land North of The Partway (Site S80) should be included in Policy H3 as an allocation for about 350 dwellings to compensate, in part, for the deletion of the above sites</p> <p>The supporting text in the format used for other allocations could be as follows (subject to agreement with the LPA).</p> <p>"Land North of the Partway at Old sarum is allocated for the development of approximately 350 dwellings on 17 hectares of land as shown on the Proposals Map. The site is well located to the new communities at Old Sarum and Longhedge and will contribute to sustaining the local services and facilities provided by these developments. The existing impact of new housing at Old Sarum within the wider landscape can be mitigated by strengthening landscaping to the north east boundary of the site along the Monarchs Way PRoW.</p> <p>Designated heritage assets in the vicinity include 'Ende Burgh' long barrow, Old Sarum Airfield Conservation Area, and Old Sarum Ancient Monument. Archaeological remains are recorded within the site. Design and layout taking account of a Heritage Impact Assessment would be capable of preventing development from having a harmful influence. Strategic open space along the south eastern boundary would allow for preservation in situ of below ground archaeological remains whilst maintaining views to Old Sarum SAM from Monarch's Way.</p>				
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If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To allow opportunity to provide detailed evidence and demonstrate the sustainability of SHLAA Site S80, which is considered to have been unfairly represented in the Site Selection Process.				

Comment ID:	2315	Consultee Mrs Karen Johnson-Wright	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 711666	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Council's Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	2316	Consultee Mr Ian Preece	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132372		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1) IMPACT ON LOCAL TRAFFIC</p> <p>There has been a significant increase in traffic flow along the A3094 Netherhampton Road in recent years, particularly at peak periods, due to the building of the Wellworthy Drive development and the relocation of Bookers to the Harnham Business Park. The A3094 is also used as a 'Southern Bypass' by traffic trying to avoid the Salisbury ring road when travelling from the A36 to the North to the Southern side of the city. The current road infrastructure is not, in my opinion, robust enough to absorb an additional 1000 vehicles (a conservative estimate), nor is the surrounding infrastructure, such as the junction of the A3094 with the A338, A354 and the Newbridge Road, or the junction of the A3094 and the A36 at Quidhampton. Both of these junctions see significant volumes of traffic, with queuing extending for well over a mile at times. Salisbury already has a significant infrastructure challenge due to the physical location of the city, the restrictions imposed due to the natural habitats, and the number of rivers and watercourses that criss-cross the environment. Allowing such a large development, in such a traffic sensitive area will only make the current situation significantly worse.</p> <p>In the past, a 'Southern Relief Road' was considered, which would have been a significant help in addressing a large part of Salisbury's traffic flow problems. As this was not implemented, I cannot see any justification for additional development work in the area that is already subject to so much congestion.</p> <p>I would also point out that recent changes to the provision of pedestrian crossings on the A3094 mean it is extremely difficult to cross this road at peak times and weekends.</p> <p>Whilst I fully understand the pressing need for additional, affordable housing, any development must take into account the impact of the proposed work on a number of important areas: LOCAL TRAFFIC, LOCAL EMPLOYMENT and LOCAL SERVICES.</p> <p>In conclusion, I would urge the Economic Development and Planning department to think very carefully about this and consider a holistic approach to the provision of housing in the City. The plans as they stand do not appear to have fully taken into account the very real issues that development on this scale would create, or the needs of the local population.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2317	Consultee Mr Ian Preece Person ID: 1132372	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2) IMPACT ON LOCAL EMPLOYMENT</p> <p>It is tempting to think that a large influx of new residents will be a good thing for the local economy, but I do not believe this to be the case with just provision of housing.</p> <p>The simple question to ask is "Where will people living in the new development work?" I put this question to the Council staff at the public exhibition held at the Guild Hall in Salisbury, and was told that all new housing development required provision for appropriate commercial development, to ensure that a balance was maintained. I asked about where this development would be, and did not get a straight answer, just a comment that 'commercial development tends to lag behind housing'. So, to put it bluntly, there is nowhere for a significant number of new people making their home in the City, to work. At the same exhibition, I also heard a Council representative suggest that new residents would be travelling 'to the West of the City' for work. This is a staggeringly na-ive view. There ARE NO SIGNIFICANT EMPLOYMENT OPPORTUNITIES TO THE WEST OF THE CITY.</p> <p>If you accept this fact, then adding to the population will actually increase the competition for jobs. It is interesting to note that the Harn ham Business Park STILL has only one client, namely Bookers, who relocated locally. The park has been available for development for years now, but it would appear that nobody wants to invest their time and money in Harnham for commercial purposes. This is probably related to the local traffic problems discussed in (1) above. Therefore, provision of work for so many new residents seems pretty remote.</p> <p>On a wider point, the number of employers who provided clerical work in the City has fallen drastically in recent years, with key companies like Friends Provident taking their business elsewhere. So, the opportunities for local work are limited.</p> <p>Whilst I fully understand the pressing need for additional, affordable housing, any development must take into account the impact of the proposed work on a number of important areas: LOCAL TRAFFIC, LOCAL EMPLOYMENT and LOCAL SERVICES.</p> <p>In conclusion, I would urge the Economic Development and Planning department to think very carefully about this and consider a holistic approach to the provision of housing in the City. The plans as they stand do not appear to have fully taken into account the very real issues that development on this scale would create, or the needs of the local population.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2318	Consultee Mr Ian Preece Person ID: 1132372	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3) IMPACT ON LOCAL SERVICES The A3095 runs for approximately four miles between Fugglestone St. Peter at Wilton in the West, to the Newbridge interchange in the East. The number of local amenities along that route is woeful: Local shop for everyday items= 1 Locals School = 1 nursery and middle school Takeaway= 1 Doctors surgery = none Chemists= none Petrol Station = none The lack of these facilities means that local residents are forced to travel into and out of Salisbury, all using the same section of the A3094, and adding to the problems. All school children not in primary or middle schools have to travel right across the City. I understand there is provision for a school of some sort, but any future developments MUST be supported by corresponding improvements to local services and facilities. I genuinely believe that the community would embrace improvements in local services if it meant that journeys into the city centre, and particularly the A36 Southampton Road, were greatly reduced. Just adding houses and residents will do nothing to help an already difficult situation. Whilst I fully understand the pressing need for additional, affordable housing, any development must take into account the impact of the proposed work on a number of important areas: LOCAL TRAFFIC, LOCAL EMPLOYMENT and LOCAL SERVICES. In conclusion, I would urge the Economic Development and Planning department to think very carefully about this and consider a holistic approach to the provision of housing in the City. The plans as they stand do not appear to have fully taken into account the very real issues that development on this scale would create, or the needs of the local population.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2319	Consultee Craig Harrison	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132380		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write to object to the proposed planning adjacent to Westmead Crescent and Boundry Walk. I use these fields frequently for walking my dogs, and enjoying walking from Trowbridge to Southwick. Over time I've seen lots of wildlife, from Rabbits to woodpeckers and even Deer. The fields are next Southwick country park, and the wildlife doesn't suddenly start and end in this park. The wildlife spills over and needs places to live and thrive. I ask of you to take into consideration the effects you have on such a space. With so many brown sites in Trowbridge that are possible to build on, it's so disheartening that the wildlife will be significantly reduced by these proposed plans. I ask you reconsider the proposed plans, and I will fight them ever step of the way.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2320	Consultee Mrs Beverly Hoddinott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126903		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Objective 2 - Housing Land Supply		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am no IT expert as my career of 24 years as a paramedic does not require this. I am really struggling to comment on line, register etc. I do not feel this is easy at all and unfair especially for the elderly.</p> <p>I wish to object to the soundness of the plan.</p> <p>POSITIVELY PREPARED- NO.</p> <p>The plan does not meet objectively assessed development requirements. It exceeds the requirement for a 5 year supply.</p> <p>JUSTIFIED-NO</p> <p>No explanation about the infrastructure to support this big expansion</p> <p>EFFECTIVE-NO</p> <p>WC'S examination of windfall which is expected to provide 60% of new housing is inadequate, comprising of 1 page out of 4500 pages of the plan documents.</p> <p>CONSISTANT WITH NATIONAL POLICY-NO</p> <p>WC has failed to give proper weight to brown field sites . Trowbridge town centre has derelict sites which could provide hundreds of homes.</p> <p>SAVE OUR GREEN SITES.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2321	Consultee Jannette and Adrian Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132392	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council Community Governance Review July 2016</p> <p>A great deal of work and public expense was involved in preparing reports for the CGR consultation that took place last year. At a meeting of full council it was decided that this area of North Bradley should not be adopted by Trowbridge Town Council.</p> <p>However, in the Wiltshire Housing Site Allocations Plan it is stated in paragraph 3.3 'That no settlements in the Trowbridge Area are considered to have had their settlement boundaries reviewed through a sufficiently advanced neighbourhood planning process.'</p> <p>Are we to understand that the costly Boundary Review of 2016 was done in a less than professional manner and therefore ultimately pointless? Or is this a way of forcing a second review in order to overturn some of the earlier conclusions which do not suit Wiltshire Council and their desire to site the majority of houses in and around Trowbridge?</p> <p>Your draft plan believes that green spaces could be protected and enhanced albeit you are taking a lot and giving little in return yet not looking at your brown sites. You believe that it would create employment in the local building trade – we suggest it might mean more cars driving to and from the area and any construction would be temporary anyway once the houses were built. These proposals believe that local shops would benefit from more houses whereas we truly think that the local shops won't necessarily gain from more houses in and around Trowbridge, maybe with the exception of the revitalised Odeon area, because in our experience local people prefer to visit 'nicer' towns with better facilities. In our opinion despite Trowbridge being the county town of Wiltshire it is very sadly lacking – you should be looking to building it up inside out and not making into a big conurbation with no character or heart.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2322	Consultee Jannette and Adrian Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132392	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This corner of North Bradley not only supports Bechstein Bats, but offers sufficient bio diversity to support Great Crested Newts, Toads, Frogs, Grass Snakes, Adders, Owls and various other birds of prey and wild deer.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2323	Consultee Jannette and Adrian Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132392	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This lane serves as public amenity used by local people walking dogs or simply enjoying a family walk in what is a rural oasis in an already built up surrounding area. Cyclists, joggers, horse riders, take advantage of the lack of cars and people also gather blackberries, sloes, rosehips, elderflowers and elderberries in the old hedgerows. The people living in the planned Ashton Park will doubtless also be making use of this facility whilst strolling through to the Spitfire Retail Park, as the workers from the White Horse Business Park already currently do.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2324	Consultee Jannette and Adrian Robinson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132392		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Any road widening at either end of Drynham Lane will totally spoil the nature of this much appreciated local resource. (We actually produced a petition when objecting to the boundary review – which was just a snapshot of how people use and enjoy this lane.) Despite the draft plan stating that Trowbridge is within walking and cycling distance (we haven't noticed any properly 'joined up' cycle lanes within this busy county town of Wiltshire) it must be appreciated in this modern age that the majority of houses will use upwards of two cars for 'school runs' and transportation to a place of work. In addition to the people living on the estate, the traffic to and from the proposed school will just exacerbate this problem.</p> <p>Any road that joins up to the roundabout near KFC will only exacerbate the gridlock that frequently occurs with the link in roads. Extra traffic along Wiltshire Drive will have a similar effect further along Bradley Road. However, the worst aspect of having such an increased number of cars along the very limited capacity within Drynham Road and Dursley Road will create problems because the road, at the quietest times, is like a slalom run where you have to weave in and out of parked cars which frequently causes frustration with motorists.</p> <p>It would be interesting to see how you would solve the problem at the end of Dursley Road where, with the exception of taxis and buses, you are not allowed to turn right onto County Road. Cars are often tempted to illegally turn right across two lanes of traffic or, as we do, drive to the top and then do a very risky u-turn on the roundabout at the top. I frequently have to stop on the roundabout because other vehicles have misinterpreted my indications and assumed I was just turning right – increased traffic doing this can only increase the likelihood of an accident.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2325	Consultee Jannette and Adrian Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132392	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This area is not prone to dramatic flooding, although the fields do have a tendency to 'pool' as pointed out by a representative of Wessex Water and the lane does flood after heavy rain. It does seem that the local area copes well enough with adverse weather but any large development is likely to introduce greater strain on this natural capability.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2326	Consultee Jannette and Adrian Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132392	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>History As already mentioned in the draft plan this lane contains the original farmhouse, now a Grade II listed building, all of the cottages nearby are former farmworkers cottages and a cow/pig shed – it seems a shame to put these at risk when Trowbridge, for a county town, is woefully short of well maintained historical sites and character.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2327	Consultee Jannette and Adrian Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132392	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Why is there such a rush forward to build over precious green land without the numerous brownfield sites contained within the centre of Trowbridge being addressed first?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2328	Consultee Jannette and Adrian Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132392	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Why would you consider building all these houses when the primary schools are already over-subscribed and secondary schools at full capacity within a few years (based on your own research)?</p> <p>Why would you consider building all these homes when there is insufficient capacity within dentist and doctor's surgeries in the local areas? A fact of enormous public concern with national and local resources already stretched to the limit.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2329	Consultee Mr and Mrs Trevor and Shelley McGrath	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132398	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are writing to protest against the proposed development on the fields at Church Lane, Trowbridge (BA14 OEH). Having read the proposals we think the access onto the A361 Frome Road is clearly dangerous and other access points totally unsuitable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2330	Consultee Mr and Mrs Trevor and Shelley McGrath	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132398	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The pollution, noise levels and traffic congestion would be unacceptable. This development would completely ruin the ambience of the countryside feel of the area which would be deeply upsetting to residence and visitors.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2331	Consultee Mr and Mrs Trevor and Shelley McGrath	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132398	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	One reason we chose to live in Church Lane was because of the views across the fields and the Country Park which is particularly helpful to Mr McGrath, who is disabled, and greatly appreciates the rural aspect. These views would be lost if the development is allowed to go ahead.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2332	Consultee Mr and Mrs Trevor and Shelley McGrath	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132398	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are informed by local residents that planning permission on this site has been denied on several occasions in the past mainly, we understand, due to the regular flooding of the area which makes it unsuitable for housing. Similar situations have arisen throughout the country, with dire consequences.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2333	Consultee Mr and Mrs Trevor and Shelley McGrath	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132398	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We also have Wildlife issues to consider; Beckstein bats, regular visits from deer, badgers etc. and of course, the ancient hedgerows and profusion of wild flowers which would be lost under this ill considered urbanisation of our rural environment.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2334	Consultee Mr and Mrs Trevor and Shelley McGrath	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132398	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We would like to know why there is planning in place for over 5,000 dwellings in Trowbridge, which have not even been started. If housing is such an urgent issue, why have these houses not been built?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2335	Consultee Mr and Mrs Trevor and Shelley McGrath	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132398	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Also, there are more suitable brownfield sites nearer or in the town centre that could be developed, so why build on greenfield sites on the town perimeter? Everyone would benefit from housing being sited on the derelict sites that blight the town and stop the Donut Effect that is rapidly degrading Trowbridge centre to the detriment of all.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2336	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT: Salisbury Transport Strategy</p> <p>Dolphin Farms Ltd does not support the allocations at Netherhampton Road (Site S1028) and gives details as to why it is unsound. The WHSAP proposes to allocate 750 houses in the Salisbury Community Area. Site S1028 would accommodate the vast majority (640) with 100 houses proposed on the site opposite (Site S10271), 100 houses to extend the existing Rowbarrow housing development (Site 3272), and 10 houses at Hilltop Way (Site S61).</p> <p>The Plan therefore proposes to allocate 85% of the potential future allocated housing in Salisbury in one location at Netherhampton Road. Our client has several major concerns in this regard::</p> <p>Traffic</p> <p>The Netherhampton Road sites are located in an area already noted in Wiltshire Council's Transport Model Forecasting report as having two key access junctions which are highway hotspots. These are: Harnham Gyratory and Park Wall Junction. Any development at Netherhampton Road would severely impact on these two junctions which are already over capacity in peak periods. See the representations made in relation to Paragraph 5.128.</p> <p>The Summary of the Salisbury Transport Strategy is included at Appendix 1. Paragraph 5.6 states that:</p> <p>"Junction improvements tend to result in more traffic passing through a particular junction and thus consume any of the additionally created capacity. This is particularly so in Salisbury, where the Netherhampton Road provides an alternative route for traffic passing through Salisbury and improvement to traffic flow through the Harnham Gyratory would result in more traffic travelling along Netherhampton Road rather than along the A36."</p> <p>This implies that Netherhampton Road could (in 2012) accommodate increased levels of traffic from the Harnham Gyratory travelling away from Salisbury City Centre. The proposal of 740 homes on Netherhampton Road will not only have a major adverse impact on these junctions, it would also have to contend with the additional traffic proposed above if the Council's plans come to fruition. It is proposed that the Council's Transport Strategy is flawed and before any strategic allocations can be made, the traffic modelling and proposed network improvements MUST be robust and based on housing trajectories looking forward to 2036 in line with the timescales of the Council's intended Local Plan Review.</p> <p>A planning application was submitted by Wiltshire County Council in 2002 (ref. S/2002/1961) for the construction of a viaduct over the River Nadder and the construction of a single carriageway relief road for Harnham including associated infrastructure and works on land which forms part of the Site S1028.</p>				

	<p>It is submitted that the development of Sites S1027 and S1028 would not only substantially increase traffic movements along Netherhampton Road and have major adverse impacts on the already burdened highway, it would also remove the opportunity to provide a clear and practical highways solution for the city. As it stands, there are no proposals to improve the current highways problems, despite having been on the Council's agenda for many years.</p> <p>In these circumstances, it is essential that a highways solution be proposed in order to be confident in the delivery of the homes prior to any allocation</p> <p>It is submitted that the Policy H3.1 allocations at Netherhampton Road (S1027 and S1028) are neither sustainable nor deliverable within the plan period. Policy H3.1 should be deleted and Site S1027 deleted from Policy H.3.</p>
<p>Attached files (Please see Objective)</p>	<p>4728738</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To allow the opportunity to provide detailed evidence and articulate concerns over the sustainability and deliverability of the H3.1 allocation.</p>

Comment ID:	2337	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1, H3.3 Netherhampton Rd Salisbury			Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Landscape		Effective		
	<p>The evidence base supporting the WHSAP includes a Landscape Assessment which assesses all of the proposed site allocations. The assessment of Site Ref. S1028 is set out at pages 13-16 of the Landscape Assessment Part 2. It judges the site to be:</p> <p>Attractive and peaceful with high visual prominence; High sensitivity for public accessibility; Contains highly important views; Low mitigation potential; HIGH ADVERSE effect on landscape character; HIGH ADVERSE impact on views (including view from public rights of way); Medium adverse effects on neighbouring residential properties, and Low capacity to accommodate change.</p> <p>The assessment goes on to state that development of the site would adversely affect views and it would be difficult to mitigate against this; and that development of the site would conflict with the recommendations made for the site and the wider area, as set out in the "Salisbury District Settlement Setting Assessment" (2008).</p> <p>The findings of the Landscape Assessment as documented were not included in the summary assessment of the Sustainability Appraisal of Site S1028 which is set out at Table F.9 within the Salisbury Community Topic Paper. Misleadingly, the second paragraph specifically states that "No major adverse effects have been identified for this site". It is submitted that due consideration has not been given to the potential landscape harm that would arise through the site's development and its encroachment towards the Cranborne Chase AONB boundary, thereby potentially affecting its setting.</p> <p>Notwithstanding the sensitivity of the landscape within which Site S1028 is located, as an urban extension it relates very poorly to the existing settlement pattern and has no well defined boundaries. It does not represent a sustainable consolidation of existing development or relate to defined physical boundaries. There are more logical sites available, including our client's land North of Old Sarum (Site S80)</p> <p>It is submitted that the Policy H3.1 allocations at Netherhampton Road (S1027 and S1028) are neither sustainable nor deliverable within the plan period. Policy H3.1 should be deleted and Site S1027 deleted from Policy H.3.</p>		Consistent with national policy		
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To allow the opportunity to provide detailed evidence and articulate concerns over the sustainability and deliverability of the H3.1 allocation.

Comment ID:	2338	Consultee Dolphin Farms Ltd	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132344	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Water Supply</p> <p>There is no local water supply capacity available for the development of 640 homes at Site S1208 and this has been confirmed by a local water utility company (ref. Table G.5 of the Salisbury Community Area Topic Paper). A capacity appraisal would be needed to confirm the scope, and works would be necessary to upgrade the local supply and capacity. In the absence of knowledge of the scale of the works, it is submitted that such works may render the scheme unviable, particularly when combined with highways infrastructure upgrades (yet to be identified). It is submitted that the Policy H3.1 allocations at Netherhampton Road (S1027 and S1028) are neither sustainable nor deliverable within the plan period. Policy H3.1 should be deleted and Site S1027 deleted from Policy H.3.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To allow the opportunity to provide detailed evidence and articulate concerns over the sustainability and deliverability of the H3.1 allocation.				

Comment ID:	2339	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Deliverability</p> <p>The deliverability of Site S1208 is extremely questionable. There is no evidence to indicate that development could come forward by overcoming the very real constraints and develop a comprehensive mixed use strategy within the plan period. We consider that the approach taken in the HSAP to allocate 87% of the Salisbury housing allocations in one location, with many unknown and unresolved issues, risks a significant housing shortage in Salisbury within the plan period.. Particularly when considered in tandem with the allocations of housing at Churchfields (1100 houses) and the Central Car Park (200 houses) which have been confirmed in the WHSAP as unlikely to come forward within the Plan period.</p> <p>By limiting the potential housing supply to one large site in Salisbury, the plan conflicts with paragraph 14 of the NPPF which states that: "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change"</p> <p>Should Sites S1028 and S1027 fail to deliver within the plan period, the Plan would not allow for sufficient flexibility for an alternative, deliverable site to come forward in accordance with policy.</p> <p>In terms of lead times a report into the delivery of urban extensions on behalf of Gladman developments limited was prepared in February 2014 and was submitted as evidence to the Stroud Examination. The Gladman study was supported by evidence provided by local authorities on 78 sites. The Study considered the factors associated with bringing forward major urban extensions of 500+ dwellings before moving on to look at specific case studies from each of the English regions, Scotland and Wales. The Study was an exercise in considering deliverability, the factors which affect deliverability, the timescales involved from a site being identified for development to planning permission being granted and thereafter the rates at which housing can realistically be delivered on major urban extension sites of 500+ dwellings.</p> <p>The results of the site specific research, was then drawn together to inform an overall assessment of the timescales associated with bringing forward urban extensions and rates of delivery once development gets underway. The Study was made available to LPAs, government departments and agencies and industry bodies as an evidence based tool which can be drawn upon to inform Development Plans across the UK.</p> <p>The Study found that the time taken to determine planning applications is a major factor in the overall delivery timescales for Major Residential Development sites. The average time period from the initial concept to the grant of planning permission for sites in England is 6.67 years. The average timescale from submission to a grant of outline planning permission was 34 months (time periods for determination as provided by the relevant Authority).</p> <p>The average across those sites in the Study which have extant permission in outline and where the timescales between the Council resolving to grant permission and the decision being issued are available (where the time period for legal agreements to be made has been provided by the Authority) was 23.6 months. It should be noted many sites failed to progress beyond a resolution to grant because of unresolved legal matters.</p>				

	<p>In terms of delivery from subsequent discussions with the relevant developers the Study found (including Taylor Wimpey, Barratt, David Wilson Homes, Bellway and Redrow), the average annual delivery rate of 30 - 35 dwellings per annum per single house builder outlet is realistically achievable.</p> <p>The Study concluded that an 8-year period should be allowed for from the preparation of an outline/ principle planning application to the delivery of homes. It is important to note that the Study was rooted in factual evidence provided by Local Authorities across England and Scotland. The Savills Study on behalf of Barratt Homes in October 2014 provided an update on the Gladman Study (also submitted to the Stroud Local Plan Examination). It identified 24 sites for which an outline application was submitted after 2010, 18 of which were identified in the original Gladman report.</p> <p>Compared with the overall sample, these sites progressed much more quickly, taking an average of 33 months from the submission of the outline application to start on site, against the average of the whole sample of 60 months. "This suggests that it has become more likely that large sites will progress through the planning system quickly enough to begin delivering housing units within the lifetime of a five-year housing land supply plan." Even so, 33 months from submission of outline planning application to a start on site would still point to an overall period approaching 4 years for the first occupation once the initial infrastructure phase has been allowed for together with the construction period for the first houses.</p> <p>If this were applied to the Netherhampton site, it would take 6.7 years to progress to outline application stage, and a further 33 months so first commencement. This would take the timeframe beyond 2026.</p> <p>Therefore, even in the event where Site S1028 is considered to be developable, it is highly unlikely to commence within the plan period. It is submitted that the Policy H3.1 allocations at Netherhampton Road (S1027 and S1028) are neither sustainable nor deliverable within the plan period. Policy H3.1 should be deleted and Site S1027 deleted from Policy H.3.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To allow the opportunity to provide detailed evidence and articulate concerns over the sustainability and deliverability of the H3.1 allocation.</p>

Comment ID:	2340	Consultee Dolphin Farms Ltd	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132344	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.3 Netherhampton Rd Salisbury		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Local Plan Review</p> <p>The Wiltshire Core Strategy (WCS) 2015 plans for housing to come forward through its strategic allocations, neighbourhood plans and planning applications as well as subsequent site allocations development plan documents. The need to bring forward a Housing Site Allocations Plan to compliment the WCS was identified to provide a surety of housing supply through the remaining plan period to 2026. At the same time the Council has embarked upon the Wiltshire Plan Review for the period 2016 - 2036 with a regulation 18 consultation on Options in 2018.</p> <p>Notwithstanding the concerns over the sustainability of the proposed H3.1 allocation, there is a clear doubt over its ability to deliver housing over the plan period. Paragraph 4.68 recognises the need for a "generous lead in time" for delivery of Netherhampton Road, recognising the scale of the site and need to develop a mitigation strategy and master plan. The site is also identified as having potential to provide employment land for relocation of businesses from Churchfields Business Park, thus freeing up land for delivery of housing at that location in the "longer term". There is no indication of the extent of employment land to be provided under H3.1 for this purpose. Churchfields was first allocated in the South Wiltshire Core Strategy and there is still no indication of any strategy for relocating the 200 or so businesses that occupy the business park. It should be noted that this is a "Housing Sites Allocations Plan" intended to compliment the WCS and provide surety in housing land supply during the plan period up to 2026. Employment sites are allocated, with land requirements specified, through the WCS, mainly as part of strategic mixed use developments. The need for further employment sites will form part of the Local Plan Review.</p> <p>Policy H3.1 is the only mixed use allocation within the HSAP and of a significantly larger scale than the other allocations. In all the circumstances, it is evident that the land at Netherhampton Road should be given more time to assess constraints and develop a mixed use development strategy. The scale of development should be more appropriately considered through the Local Plan Review 2016-2036.</p> <p>It is submitted that the Policy H3.1 allocations at Netherhampton Road (S1027 and S1028) are neither sustainable nor deliverable within the plan period. Policy H3.1 should be deleted and Site S1027 deleted from Policy H.3.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To allow the opportunity to provide detailed evidence and articulate concerns over the sustainability and deliverability of the H3.1 allocation.				

Comment ID:	2341	Consultee Mrs Beverly Hoddinott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126903		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	CONSISTANT WITH NATIONAL POLICY-NO WC has failed to give proper weight to brown field sites . Trowbridge town centre has derelict sites which could provide hundreds of homes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2342	Consultee Mr and Mrs Trevor and Shelley McGrath	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132398	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	The centre of Trowbridge is dying and presents a dismal welcome to visitors and locals alike; additional out-of-town development will only make matters far worse. Traders and shoppers are both very pessimistic about the commercial future of Trowbridge town centre and feel that the chronic neglect and lack of civic pride shown by the local authorities will lead to the irreversible decline of the heart of the town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2343	Consultee Mrs Karen Forster Person ID: 1132418	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified - The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent - The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	2344	Consultee Paul Bailey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132429		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As I understand it, there is already oversupply of housing forecast in both the local Malmesbury Community Area (100 houses before any Windfall sites) and the wider North & West Wiltshire area (2200 houses). There is therefore no strategic need for a site of the proposed scale in Crudwell.</p> <p>Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met. Crudwell is not anti-development, it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2345	Consultee Paul Bailey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132429	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I have lived in Crudwell all my life (26 years) and am very concerned about the proposals to substantially increase housing in the village when facilities are already running at full capacity. The plan to build 50 dwellings at Ridgeway Farm represents a 20% increase in dwellings in the village of Crudwell, an increase that is neither necessary nor sustainable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2346	Consultee M.A. & G.A. Wyeth	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132428	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to make a protest against the proposed development along Netherhampton Road, Salisbury. Harnham Village is already saturated with houses using the one main road. The traffic bottlenecks every day on route to Salisbury or Wilton. It makes it almost impossible to try and cross the road on foot.</p> <p>I hope the authorities will come to the right conclusion and realise this is not the appropriate environment for further development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2347	Consultee Mr & Mrs John and Jean Beech	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132437	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The infrastructure has not been thought through. The only access to the site is via Elizabeth Way on 50 mph road. At the moment there is no public transport on this road. With an estimated number of 500-600 dwellings bus stops and crossings will have to be put in place.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2348	Consultee Mr & Mrs John and Jean Beech	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132437	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The 217 dwellings mentioned only refer to the Wyke Road end of the site. Once further planning permission has been given for the rest of the 16 hectares there will be 500-600 dwellings. i.e. 500-600 homes = 700-800 cars 500-600 homes = 700-800 children There are: no schools no shops no Dr No bus service</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2349	Consultee Mr & Mrs John and Jean Beech	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132437	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Hilperton Gap is not a field lying empty it is farm land currently growing maze				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2350	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared		
Please identify the policy, paragraph, table, figure or site to which you are referring.	5.128 Salisbury	Effective			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED REPORT: Salisbury Transport Strategy</p> <p>Dolphin Farms Ltd do not support the paragraph but give details as to why it is unsound.</p> <p>Paragraph 5.128 of the WHSAP relates to the transport network in Salisbury. The paragraph seeks to provide reassurance relating to 'measures to support the scale of growth envisaged by the WCS'. Our client has several key concerns in this regard.</p> <p>The Summary of the Salisbury Transport Strategy (2012) is attached at Appendix 1. There are no page numbers but page 1 sets out the housing growth for Salisbury and Wilton as set out in the WCS as 4, 170 homes. However, the indicative requirement is in fact 6,060 homes by 2026.</p> <p>Figure 3.2 of the Summary document specifically identifies the Harnham Gyratory, Exeter Street roundabout and the Park Wall Junction as operating at over 70% - 90% capacity. These junctions would all be heavily affected by the proposed allocation of 640 homes on Netherhampton Road as the traffic from that site (Site S1028) will pass at least one of these junctions when travelling to any destination.</p> <p>Section 3 of the Summary document sets out the highway constraints as including:</p> <p>The highway network is constrained by the operation of Exeter Street Roundabout.</p> <p>There are delays on the roads approaching the Harnham Gyratory.</p> <p>Some through traffic between Wilton and Southampton Road routes through Harnham rather than the A36.</p> <p>Despite forecasting traffic modelling dating back to 2008, there has been no progress in terms of upgrading the existing highway network to date.</p> <p>The Summary document makes recommendations for network improvements to the Harnham Gyratory and Exeter Street roundabouts but there has been no progress in terms of upgrading the capacity. Furthermore as the housing requirement increases, there is no evidence to demonstrate that the proposed measures to 'upgrade' the road network will be sufficient to address the increased amount of traffic.</p> <p>Paragraph 5.6 of the Summary document states that:</p> <p>"Junction improvements tend to result in more traffic passing through a particular junction and thus consume any of the additionally created capacity. This is particularly so in Salisbury, where the Netherhampton Road provides an alternative route for traffic passing through Salisbury and improvement to traffic flow through the Harnham Gyratory would result in more traffic travelling along Netherhampton Road rather than along the A36."</p>				

	<p>This implies that Netherhampton Road could (in 2012) accommodate increased levels of traffic from the Harnham Gyratory travelling away from Salisbury City Centre. The proposal of 740 homes on Netherhampton Road will not only have a major adverse impact on these junctions, it would also have to contend with the additional traffic proposed above if the Council's plans come to fruition. It is proposed that the Council's Transport Strategy is flawed and before any strategic allocations can be made, the traffic modelling and proposed network improvements MUST be robust and based on housing trajectories looking forward to 2036 in line with the timescales of the Council's intended Local Plan Review.</p> <p>The Council cannot rely on the status quo to support the levels of traffic movements that would be generated from 740 homes on Netherhampton Road.</p>
Attached files (Please see Objective)	4728738
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To allow the opportunity to present detailed evidence and articulate concern over outdated traffic modelling and lack of highway network improvements.

Comment ID:	2351	Consultee Mrs K Shepherd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445966		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register most strongly, my opposition to the proposed building of 840 houses in Harnham. We have lived at this address for thirty years and year on year, have had first hand experience of the ever increasing volume of traffic and the inability of the existing roads to cope. In twenty years the character of the traffic on the Harnham road has changed dramatically and now includes a very large number of heavy goods vehicles. The road can barely cope with volume of traffic at present: every day traffic backs up for more than 500 metres from the Harnham Gyratory. This causes significant pollution and is a major health hazard particularly to young children on their way to school and to the elderly. Road safety is a major concern. Sadly, a recent fatality closed the road for 5 hours. The result was an 8 minute journey to Park Wall traffic lights taking some 50 minutes, as the city routes and Wilton road felt the knock on effect of this accident. The constructions of a large number of dwellings, accompanied by at least one vehicle per household, will add an unsupportable burden to an already stretched transport system. Other solutions need to be explored. Before any building is considered, an efficient transport infrastructure has to be present. Last week, I was interested to see on local television, an Oxford City councillor highlighting their need for more housing and stating their priority and starting point would be transport. Because we are a medieval city, built around the confluence of 5 rivers, a modern transport infrastructure will always pose problems. We should be considering smaller, brown field site developments and developing those areas around established park and ride bus routes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2352	Consultee Mrs K Shepherd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445966		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register most strongly, my opposition to the proposed building of 840 houses in Harnham. We have lived at this address for thirty years and year on year, have had first hand experience of the ever increasing volume of traffic and the inability of the existing roads to cope. In twenty years the character of the traffic on the Harnham road has changed dramatically and now includes a very large number of heavy goods vehicles. The road can barely cope with volume of traffic at present: every day traffic backs up for more than 500 metres from the Harnham Gyratory. This causes significant pollution and is a major health hazard particularly to young children on their way to school and to the elderly. Road safety is a major concern. Sadly, a recent fatality closed the road for 5 hours. The result was an 8 minute journey to Park Wall traffic lights taking some 50 minutes, as the city routes and Wilton road felt the knock on effect of this accident. The constructions of a large number of dwellings, accompanied by at least one vehicle per household, will add an unsupportable burden to an already stretched transport system. Other solutions need to be explored. Before any building is considered, an efficient transport infrastructure has to be present. Last week, I was interested to see on local television, an Oxford City councillor highlighting their need for more housing and stating their priority and starting point would be transport. Because we are a medieval city, built around the confluence of 5 rivers, a modern transport infrastructure will always pose problems. We should be considering smaller, brown field site developments and developing those areas around established park and ride bus routes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2353	Consultee Mrs K Shepherd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445966		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Harnham has very little infrastructure to support its existing population. There are no doctors or dentists and no secondary school and only a single convenience store. This infrastructure cannot support such a large increase in population.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2354	Consultee Mrs K Shepherd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445966		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Harnham has very little infrastructure to support its existing population. There are no doctors or dentists and no secondary school and only a single convenience store. This infrastructure cannot support such a large increase in population.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2355	Consultee Mrs K Shepherd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445966		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The housing problem is not going to go away any time soon. In light of Salisbury's problems, Wiltshire County Councillors should apply to the Government for the money to develop a garden town, towards the north of the county, as part of a solution to this problem.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2356	Consultee Ms Julie Vaughan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126178		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a long term resident of Parsonage Green West Harnham Salisbury Wilts. I wanted to voice my constructive objections ie road infrastructure to the proposed new housing development on Netherhampton Road but unfortunately i am unable to do this on your website due to the complicated nature of the site so please accept this email to register my objections.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2357	Consultee Dolphin Farms Ltd	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1132344	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table	4.1 Housing Market Areas: Minimum to be allocated	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Dolphin Farms Ltd does not support Table 4.1 but explains why it is unsound.</p> <p>Table 4.1: Housing Land supply for Wiltshire's HMAs (forecast at 1 April 2017) indicates that the remaining housing requirement in the South Wiltshire HMA is:</p> <p>Requirement: 10,420, Completions 5,067, Developable Commitments 4,759, Plan Allocations 594</p> <p>Pegasus do not agree that the Developable Commitments as set out in Table 4.1 at 4,759 is correct. This figure includes 750 (of the allocated 1100) homes at Churchfields (Salisbury) and 200 homes at the Central Car Park site (Salisbury). It is widely known that these sites have been longstanding allocations (ref. Wiltshire Core Strategy, Core Policy 20). Paragraphs 4.66 of the WHSAP confirm that Churchfields is a strategic mixed use site that, in order to be developed requires substantial employment uses to decant, and is now expected to commence "later than envisaged and much less land for new housing will be available before 2026." Commercial space at Churchfields is available to let and there are some 200 businesses with about 4,500 employees within the estate. The site was originally allocated for housing in the South Wiltshire Core Strategy (2012) and there is still no evidence to indicate that the decant process will commence in the foreseeable future or that the Council has any strategy to enable this to happen to the extent that the site can be comprehensively planned for housing.. Pegasus submit there is no prospect of this site coming forward within the plan period and the provision of housing should not be reliant upon this site. Similarly, the Central Car Park site is in commercial use with no evidence or application coming forward to indicate its deliverability within the plan period.</p> <p>Pegasus submit that neither Churchfields nor the Central Car Park site should be included within the Developable Commitments as this is misleading and contrary to paragraph 14 of the NPPF which states that local planning authorities should positively seek opportunities to meet the development needs of their area and should meet their objectively assessed needs. The WHSAP acknowledges the delay in these allocations being deliverable and on this basis, Wiltshire Council has not positively sought alternatives to meet the housing needs.</p> <p>Pegasus submit that the Developable Commitments in Table 4.1 to be reduced by 950 homes to 3,809. This would have the impact of increasing the residual requirement to 1,544 in the South Wiltshire HMA.</p> <p>This will ensure that the plan is justified insofar as being the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence (paragraph 182 of NPPF).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Dolphin Farm Estates had good local knowledge and would welcome participation on the potential delivery of the sites within the plan period.				

Comment ID:	2358	Consultee Mr & Mrs Richard & Rosemarie Gale	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704313	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Proposed 40 houses will mean additional cars and people on B3098 daily Adjacent parking in estate not roads not to be used Access onto B3098! Likely to need a roundabout access to village up to White Horse Tourist attraction Where cars will park with limited garages available or small estimated sizing Bratton Parish Council don't accept the site at recent meeting Paramount to access via County Hall to see plans put forward Additionally meeting for residents to comment and endorse Bratton Council with their voices and our views.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2359	Consultee Mr & Mrs Richard & Rosemarie Gale	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704313	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Drain on school. Some come now from Westbury and Bratton Doctors surgery local to village can't take more Bratton Parish Council don't accept the site at recent meeting Paramount to access via County Hall to see plans put forward Additionally meeting for residents to comment and endorse Bratton Council with their voices and our views.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2360	Consultee Mr & Mrs Richard & Rosemarie Gale	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 704313	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Too dense for sites! Adapt landscaping required Bratton Parish Council don't accept the site at recent meeting Paramount to access via County Hall to see plans put forward Additionally meeting for residents to comment and endorse Bratton Council with their voices and our views.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2361	Consultee Ms Julie Vaughan	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126178	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a long term resident of Parsonage Green West Harnham Salisbury Wilts. I wanted to voice my constructive objections ie road infrastructure to the proposed new housing development on Netherhampton Road but unfortunately i am unable to do this on your website due to the complicated nature of the site so please accept this email to register my objections.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2362	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared Justified Consistent with national policy		No
Please identify the policy, paragraph, table, figure or site to which you are referring.		Table 4.7 HMA housing land supply 2006-2026			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Paragraph 47 of the NPPF requires that the full objectively assessed needs for market and affordable housing (OAN) is met within the Housing Market Area (HMA) as far as is consistent with the policies set out in the NPPF.</p> <p>The Wiltshire Core Strategy Inspector issued a letter on 2nd December 2013 (large parts of which are maintained in his Final Report) which identified that the OAN was in the region of 44,000 dwellings over the plan period. Nevertheless, the Inspector went on to accept a housing requirement of 42,000 dwellings.</p> <p>The High Court Judgment of Jelson Limited vs Hinckley and Bosworth Borough Council et al [2016] EWHC 2979 (Admin), defines what is meant by the terms OAN and housing requirement in paragraph 41, as follows:</p> <p>"Full Objective Assessment of Need for Housing: This is the objectively assessed need for housing in an area, leaving aside policy considerations. It is therefore closely linked to the relevant household projection; but it is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics ...</p> <p>Housing Requirement: This is the figure which reflects, not only the assessed need for housing, but also any policy considerations that might require that figure to be manipulated to determine the actual housing target for an area. For example, built development in an area might be constrained by the extent of land which is the subject of policy protection, such as Green Belt or Areas of Outstanding Natural Beauty. Or it might be decided, as a matter of policy, to encourage or discourage particular migration reflected in demographic trends. Once these policy considerations have been applied to the figure for full objectively assessed need for housing in an area, the result is a "policy on" figure for housing requirement. Subject to it being determined by a proper process, the housing requirement figure will be the target against which housing supply will normally be measured."</p> <p>This identifies that a policy-on housing requirement can be different from the policy-off OAN to achieve particular policy objectives, such as protecting environmental assets or preventing unsustainable cross boundary relationships. However, in Wiltshire no such policy objective was fulfilled through the adoption of a housing requirement below the OAN. The reasons were in effect that:</p> <ol style="list-style-type: none"> i. the OAN could not be achieved; ii. the Council could not demonstrate a five-year land supply against the OAN; iii. the OAN was not assessed as being the preferred option through the Sustainability Appraisal; and iv. the Council were committed to rapidly reviewing and responding to the OAN. <p>However, none of these reasons can now be justified (as described below) and so there can be no reason for not meeting the full OAN as required by paragraph 47 of the NPPF.</p>			

The OAN could not be achieved

Wiltshire delivered in excess of the annualised housing requirement in 2013/14 and in 2014/15, even in the absence of allocations prior to 2015. This clearly demonstrates that the adopted housing requirement can be sustainably exceeded. Indeed, now that the Strategic Allocations of the Core Strategy (and the Chippenham Site Allocations Plan and Neighbourhood Plans) are delivering it would be expected that these rates of delivery would increase significantly. This entirely undermines the previous evidence presented to the Inspector examining the Wiltshire Core Strategy that such rates of development were unachievable.

The Council could not demonstrate a five-year land supply against the OAN

Based on the Council's figures and method of calculation, the Council would currently be able to identify a five-year land supply against a housing requirement of 46,158 dwellings (7,440 in East Wiltshire HMA; 27,898 in North and West Wiltshire HMA; 10,820 in South Wiltshire HMA) in addition to the allowance for 900 dwellings at the West of Swindon. The adopted housing requirement can therefore be increased to reflect (or even exceed) the OAN in accordance with the NPPF.

The OAN was not assessed as being the preferred option through the Sustainability Appraisal

The Sustainability Appraisal (SA) has evolved since the adoption of the Core Strategy, and this has been used to inform the Housing Site Allocations Plan which proposes to deliver circa 46,600 dwellings.

The Council were committed to rapidly reviewing and responding to the OAN

The Inspectors Final Report relied upon the Council producing a new SHMA by early 2016 (see paragraph 81). This would have enabled the Council to respond positively to address the identified needs through the planned early review of the Core Strategy. However, in the intervening 3 years, no such SHMA has been produced and there has been no progress on the early review of the Core Strategy. It is self-evidently the case, that the Council have not re-assessed needs and responded appropriately. The continued reliance upon the commitments of the Council to identify and address the OAN should not be afforded weight, given that the previous commitments have not been fulfilled.

Based on the preceding analysis, there is no evidence and no justification for not meeting the OAN in full in Wiltshire, as required by paragraph 47 of the NPPF. The Housing Site Allocations Plan should therefore seek to deliver the OAN of 44,000 dwellings. Such an approach would be wholly consistent with the housing requirement of the Core Strategy which requires the delivery of at least 42,000 dwellings.

The SHMA

Wiltshire Council and Swindon Borough Councils have jointly commissioned a SHMA. A draft of this document was presented at workshops in October 2016 although the document was not published. However, in the following year no further progress has been made towards the publication of this SHMA. This is highly unusual given that SHMAs typically take only a few months to produce and that the Wiltshire Core Strategy Inspector had relied upon the publication of this document in early 2016 to find the Wiltshire Core Strategy sound.

This SHMA should be published as soon as possible in order that participants can either be reassured that the Development Plan for Wiltshire is doing its job and meeting the OAN in full; or that appropriate action can be taken to identify additional sources of supply.

The Standardised Methodology

The Government are due to consult upon a standardised methodology for the OAN in September 2017. Whilst this will only be a consultation document and the weight to be afforded should be viewed in this context, it will provide an indication of the OAN for Wiltshire.

Once the SHMA and/or the standardised methodology is made available, it will be necessary for the OAN to be responded to within the Housing Site Allocations Plan in accordance with the findings of the Inspector Ware regarding the Harrogate District Sites and Policies DPD who identified

that where the OAN had been reassessed it is necessary to take this into account in a Site Allocations Plan. The same finding has recently been reached by Inspector Lyons in relation to the Forest of Dean Site Allocations Plan.

Based on the preceding analysis, it is clear that in order to accord with national policy, it is necessary for the Housing Site Allocations Plan to deliver the full OAN for Wiltshire, taking account of the identified OAN (44,000 dwellings) and any newly arising evidence.

DISTRIBUTION OF GROWTH BETWEEN THE HMAs

Wiltshire contains 3 HMAs, each of which is planned to deliver at least 9% in excess of the Core Strategy minimum housing requirement according to Table 4.7. Provision of a level of housing in excess of the minimum housing requirements, and cumulatively in excess of the currently identified OAN is to be supported providing this supports the spatial distribution identified in the Core Strategy.

DEVELOPABLE SUPPLY

The Council have identified the developable supply in the CA Topic Papers and in Table 4.9 of the draft Plan. However, the Council have not identified the individual components that make up this supply and as such the total figures in Table 4.9 cannot be relied upon. The necessary evidence should have been made available for this consultation, and will be required prior to examination. Pegasus Group reserve the right to submit detailed representations on this when the necessary evidence is made available.

The latest assessment of the developable supply which is available is contained in the Wiltshire Housing Land Supply Statement Update March 2017 (HLSS). It is useful to consider some of the components of supply identified in this report in order to assess the robustness of the Councils current unpublished assessment.

There are a number of sources of supply in the HLSS which should not be relied upon to deliver as outlined below.

Windfall allowance

The Draft Plan includes a windfall allowance based on the previous delivery of previously developed sites. This source of supply is in itself uncertain, but it is useful as an indication of what would be delivered if previous rates of delivery were able to be maintained.

There are however, methodological flaws in the approach the Council takes to calculating the windfall allowance.

The Council have changed their methodology for calculating the windfall allowance since the examination of the Wiltshire Core Strategy. At that time, the Council assumed that small sites would deliver circa 575 dwellings and that large sites would deliver circa 364 dwellings totalling 939 dwellings within five years. However, the Council now assume that there will be 1,611 windfall dwellings within five years. This has been calculated using a consistent methodology for calculating the small site allowance (although based on a different period) from which it can be calculated that the Council now assume that circa 1,036 dwellings will be delivered on previously developed large windfall sites. This is despite the fact that the Council do not have any evidence that there is sufficient capacity on such sites to deliver this level of housing. Indeed, at the time of the examination the Council identified a total potential capacity of only 364 dwellings (and some of these may have subsequently gained consent and so be included in the developable supply already).

The approach of the Council in regards to the large windfall allowance relies upon the delivery of a level of dwellings for which there is no evidence that there is the requisite capacity. Indeed, the Council rely upon the trends of large windfall development in recent years, but this is inevitably hugely variable and a single large windfall development can have a disproportionate effect on the average.

Saved Local Plan Allocations

The Council continue to rely upon the delivery of saved Local Plan allocations in the HLSS. This includes sites which were allocated in the North Wiltshire Local Plan in June 2006, the Salisbury District Local Plan in June 2003, and the West Wiltshire District Plan 1st Alteration in June

2004. Despite the fact that these sites have been allocated for development for between 11 and 13 years, there has been no progress towards site delivery.

The record of delivery of sites needs to be taken into account when assessing the availability of sites as set out in the NPPG (3-020). These saved allocations have an extensive record of non-implementation and against this background the certainty of any delivery from these sites is limited. Accordingly, in accordance with the NPPG these sites should not be relied upon to deliver.

Neighbourhood Plan Allocations

The HLSS also includes a number of Neighbourhood Plan allocations which are not subject to planning applications. The developability of sites is not required to be demonstrated in order for a Neighbourhood Plan to be made. Indeed, this is demonstrated by the fact that Wiltshire Council do not consider that the majority of sites allocated in the Devizes Neighbourhood Plan will deliver prior to 2024 in the HLSS.

The fact that the Council do not consider that these sites are deliverable for an extended period casts doubt on whether these sites will deliver at all. Even if they do deliver, it would only take a minimal delay for them to deliver outside of the plan period. As such, these sites should not be relied upon to deliver in the absence of detailed evidence.

MONITORING

The Housing Site Allocations Plan is one of the delivery mechanisms for the Core Strategy. As such, the Council will be required to demonstrate that a five-year land supply exists at adoption. The Council have not yet produced the HLSS for 2017 which will be required to demonstrate this and so Pegasus Group reserve the right to submit comments on this matter when the relevant information is available.

The examination of the Housing Site Allocations Plan provides the opportunity to set the framework for monitoring housing delivery through the remainder of the plan period. Such an exercise will prevent this matter being continually debated through S78 appeals as has happened for many years.

The Buffer

Paragraph 47 of the NPPF requires that a 5% buffer is applied to the five-year housing requirement, but where there is a record of persistent under-delivery this should be increased to 20%.

The Council assess the record of delivery against the adopted housing requirement, which in itself does not represent the OAN. This means that even if the housing requirement was achieved there would still be a record of under-delivery against the housing needs. It is therefore necessary to treat the housing requirement as an absolute minimum.

Even against this housing requirement, East Wiltshire HMA has under-delivered in 60% of years; North and West Wiltshire HMA in 70% of years; and South Wiltshire HMA in 80% of years.

The Local Plans Expert Group report to Government proposed that where there was under-delivery in 65% of years this would equate to a record of persistent under-delivery. Similar approaches have been supported by Inspectors at S78 inquiries (for example ref: 3025120). This would indicate that a 20% buffer is required in both North and West Wiltshire HMA and in South Wiltshire HMA. Indeed, in these HMAs, the record of delivery has resulted in a significant shortfall against the housing requirement across the plan period to date.

The approach to dealing with undersupply Wiltshire Council adopt the Liverpool (or residual) approach to addressing undersupply which has arisen over the plan period to date. This approach has been adopted in Wiltshire since before the publication of the NPPG.

The NPPG (3-035) identifies that:

	<p>"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate."</p> <p>This is commonly referred to as the Sedgefield approach, and it is the preferred approach of the Government where there is undersupply (NB - where there is no such undersupply, there is no guidance of the appropriate approach). To adopt an alternative approach (including the Liverpool approach) it would be necessary to demonstrate that it was not possible to adopt the Sedgefield approach and that the Council was working jointly to address any five-year land supply shortfalls with neighbouring authorities.</p> <p>Indeed, this matter was discussed in detail during the appeal regarding Land off Park Road, Malmesbury (2200503) where the Inspector identified that it was necessary to adopt the Sedgefield approach to accord with the NPPG. This recommendation was supported by the Secretary of State.</p> <p>In the South Wiltshire HMA it would not be possible to demonstrate a five-year land supply using the Sedgefield approach. The Council should therefore have worked with neighbouring authorities to address the current shortfall, but they have not done so. In the absence of such joint working, it is necessary to adopt the Sedgefield approach and identify additional allocations to demonstrate a five-year land supply.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Pegasus have put forward detailed considerations in this representation and would welcome the opportunity to discuss the various aspects with the Inspector and responding to any questions, including further discussion on emerging government policy.</p>

Comment ID:	2363	Consultee Ms Julie Vaughan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126178		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a long term resident of Parsonage Green West Harnham Salisbury Wilts. I wanted to voice my constructive objections ie land flooding each winter to the proposed new housing development on Netherhampton Road but unfortunately i am unable to do this on your website due to the complicated nature of the site so please accept this email to register my objections.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2364	Consultee Ms Julie Vaughan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126178		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a long term resident of Parsonage Green West Harnham Salisbury Wilts. I wanted to voice my constructive objections ie land flooding each winter to the proposed new housing development on Netherhampton Road but unfortunately i am unable to do this on your website due to the complicated nature of the site so please accept this email to register my objections.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2365	Consultee Ms Rachel Hunt Person ID: 1102653	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to air my concerns about the choice of site 1021 (Church Lane) at a site for the proposed development of at least 40 dwellings. Planning policy states that councils should maintain the setting of Heritage Sites. Whilst the Draft Housing sites Allocations Plan does acknowledge St Johns Church and Southwick Court, it fails to mention the other listed buildings that surround this site.</p> <p>The sites at the back of Church Lane provide a rural setting for 6 Grade II Listed buildings as follows:</p> <ul style="list-style-type: none"> - St Johns Church School and Hall masters dwellings comprising 4 dwellings. (UID1021593) - Church of St Johns (UID 1364192) - 344 Frome Road (UID 1364193) - Rose Villa (UID 1021594) . <p>National policy states that:</p> <p>129 - Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.</p> <p>132 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.</p> <p>In addition to the listed buildings at this site there is also an ancient water meadow:</p> <p>MWI73579 Water Meadow, West of Upper Studley</p> <p>Summary A post medieval water meadow is visible as earthworks on air photographs.</p> <p>References</p>			

	<p>National Monuments Record, ST 85 NW 95 English Heritage Archives, 1577543 Grid reference ST 8403 5643 (map quarter sheet ST85NW)</p> <p>The site at Church lane should be maintained as open countryside to uphold the setting of these heritage buildings. Building in any of the current paddock would dramatically affect their setting, but also development of the larger field would impact on the open countryside that these buildings have shared for over 200 hundred years.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2366	Consultee Persimmon Homes Persimmon Homes Person ID: 1132230	Agent Mr Jeremy Higgins Grosvenor Court Pro Vision Person ID: 1132220	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Omission Land north of Downton Road, Salisbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The merits of allocating land north of Downton Road versus the merits of allocating land at Netherhampton Road.</p> <p>To demonstrate the suitability of the site for new residential development, the following documents have been prepared:</p> <ul style="list-style-type: none"> • a concept masterplan; • an Ecological Appraisal of the site; • a Landscape & Visual Impact Assessment (LVIA) of the site; and • a Heritage Assessment of the site. <p>3.2 Copies of these documents are attached as appendices to this document. [see attached]</p> <p>3.3 The concept masterplan (a copy of which is attached as Appendix 1) shows how the site could provide up to 290 dwellings in an acceptable fashion that would not have an adverse impact on the Salisbury or Britford Conservation Areas, the Special Landscape Area that surrounds Salisbury or areas of ecological importance or protected species. The concept masterplan has taken account of and been informed by the recommendations of the Ecological Appraisal, Heritage Assessment and LVIA.</p> <p>3.4 Based on the Councils requirements for affordable housing provision contained within the adopted Core Strategy, the proposed scheme could provide 116 affordable dwellings.</p> <p>3.5 Following consultation with the Education Authority, the concept masterplan also includes a 1.8 ha site for a new Primary School in light of the fact that existing Primary Schools in Salisbury are at capacity and the provision of such a facility would provide some “future proofing”. An email from Claire Medland, the Head of School Place Commissioning at Wiltshire Council is attached as Appendix 2</p> <p>3.6 The provision of a school on the land north of Downton Road is also closer to existing schools that are at capacity, namely Harnham and Longford Primary schools as well as recently completed new residential developments and the proposed allocation at Rowbarrow, than the proposed school to be provided on the land at Netherhampton Road. This is acknowledged in para 5.28 of the draft Housing Site Allocations DPD.</p> <p>3.7 The LVIA that has been prepared (a copy of which is attached as Appendix 3) clearly demonstrates that the development of the site would not result in a significant adverse landscape or visual impact.</p>				

3.8 The Heritage Assessment (a copy of which is attached as Appendix 4) also concludes that development of the site would not result in an adverse impact on Heritage Assets or harm the character and appearance of the Salisbury City and Britford Conservation Areas.

3.9 The Ecological Appraisal of the site (a copy of which is attached as Appendix 5) demonstrates that the residential development of the site could be achieved without having an adverse impact on protected species and could provide ecological enhancements.

In light of the above we would comment as follows on the scores given to the land north of Downton Road in the SA.

Objective 1 (Protect and enhance all biodiversity and geological features and avoid irreversible losses)

4.6 As the ecology assessment of the land north of Downton Road (a copy of which is attached as Appendix 5) demonstrates, residential development of the site would protect and enhance the biodiversity of the site. On this basis, it is considered reasonable to score it as a neutral or no effect.

Objective 2 (Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings)

4.7 We agree that the scoring for this objective in respect of the land north of Downton Road is correct.

Objective 3 (Use and manage water resources in a sustainable manner)

4.8 We agree that the scoring for this objective in respect of the land north of Downton Road is correct.

Objective 4 (Improve air quality throughout Wiltshire and minimise all sources of environmental pollution)

4.9 Given both the site's proximity to key local services and facilities and the Park & Ride located opposite the site, it is considered that future residents would have a realistic opportunity to use more sustainable (non car) modes of travel and this would help improve air quality in Salisbury and should be scored as a major positive effect.

Objective 5 (Minimise our impacts on climate change through reducing greenhouse gas emissions)

4.10 We agree that the scoring for this objective in respect of the land north of Downton Road is correct.

Objective 6 (Protect, maintain and enhance the historic environment)

4.11 Given the conclusions of the Heritage Assessment (attached as Appendix 3) and the fact that the concept masterplan (attached as Appendix 1) has taken account of the recommendations of the Heritage Assessment, it is considered that the land north of Downton Road should be scored as a Neutral or no effect.

Objective 7 (Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place)

4.12 Given the conclusions of the LVIA (attached as Appendix 5) and the fact that the concept masterplan (attached as Appendix 1) has taken account of the recommendations of the LVIA, it is considered that the land north of Downton Road should be scored as a Neutral or no effect.

Objective 8 (Provide everyone with the opportunity to live in good quality, affordable housing and ensure an appropriate mix of dwelling sizes, types and tenures)

	<p>4.13 We agree that the scoring for this objective in respect of the land north of Downton oad is correct.</p> <p>Objective 9 (Reduce poverty and deprivation and promote more inclusive and self- contained communities)</p> <p>4.14 Given the proposed provision of a new primary school on the land north of Downton Road, which would serve both the existing community as well as new residents, we consider that the land north of Downton Road should be scored as a major positive affect.</p> <p>Objective 10 (Reduce the need to travel and promote more sustainable transport choices)</p> <p>4.15 Given both the site's proximity to key local services and facilities and the Park & Ride located opposite the site, it is considered that future residents would have a realistic opportunity to use more sustainable (non car) modes of travel and should be scored as a major positive effect.</p> <p>Objective 11 (Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth)</p> <p>4.16 We agree that the scoring for this objective in respect of the land north of Downton Road is correct.</p> <p>Objective 12 (Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce)</p> <p>4.17 We agree that the scoring for this objective in respect of the land north of Downton Road is correct.</p> <p>4.18 In light of the above, we have prepared a revised version of the SA scoring in relation to the land north of Downton Road and the sites proposed to be allocated at Netherhampton Road. [See attached]</p>
<p>Attached files (Please see Objective)</p>	<p>4729436 / 4729432</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2367	Consultee J E Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132525	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Having looked online at the documents posted, I am lost as to how to leave my views online regarding this issue and hope that recording them in writing is acceptable.</p> <p>Plans to build on this field have twice before been rejected and to the best of my knowledge nothing has changed regarding this location except, maybe, there's more traffic on the B3098. I note that someone classes this road as a tranquil minor road - they clearly aren't a regular user of it, or been inconvenienced by the regular closures caused by accidents.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2368	Consultee J E Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132525	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The village was consulted to determine the requirement for new low-cost housing, and this identified a need for only a few dwellings.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2369	Consultee J E Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132525	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I believe the application incorrectly lists Bratton as having over 900 houses, with a population of under 1300 (2011). The White Horse News delivers 528 issues to Bratton properties; an extra 40 houses would make this a not inconsiderable 7.5% increase;				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2370	Consultee J E Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132525	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	this would put even more strain on drainage, services, and use of the B3098 as there is no employment and few businesses in Bratton.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2371	Consultee J E Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132525	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>A previous application proposed fewer houses on this plot; that was rejected and now 40 are being considered?! Other building developments in the village do not have this density of dwellings and they suffer parking problems - how is this development going to cope?</p> <p>To conclude, I find it incredible that our county representatives feel that this latest proposal is better suited to our Award-winning large village than the previous, failed plans. It has not addressed the problems of the earlier developments and brings the prospect of high density living to its residents and problems of parking, over-loading services, schools, and local surgery.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2372	Consultee J E Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132525	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Currently, the land under consideration is bordered by two well-used footpaths neither of which needs moving as they run along its boundaries. Residents in the new houses would be unimpressed to have all and sundry walking their dogs past their windows at all hours of the day as happens at the moment.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2373	Consultee Barry King Person ID: 1132552	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Objective 2 - Housing Land Supply		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Comments on Wiltshire Housing Site Allocation Plan Please find below comments on the above draft plan for consideration. I have used the recommended framework for providing a response as far as reasonably practicable. The Plan is Positively Prepared I cannot agree that the Plan has been entirely positively prepared. The requirement to provide additional areas for building with the county is recognised but the distribution of these additional areas seems highly biased towards Trowbridge. Why so many here, and why not in other areas? Whilst Trowbridge is the county town, the influx of the developments proposed will, in the opinion of many I am sure, ruin the town. Importantly: The sites proposed for HMA destroy the separation between Southwick, North Bradley and White Horse Business Park. Discussion locally confirms that residents are against this concept. It is not considered to be in the best interest of those outlying areas or the Town. Similarly, Hilperton and Church Lane sites should be added into the equation. The boundaries agreed in the Wiltshire Core Strategy document represent a more appropriate position. No consideration appears to have been given to use of 'Brown Field' sites of which there are several. These should be first choice for redevelopment and not the consumption of yet more Greenfield sites. Developers should not be allowed to dictate their preference for Greenfield sites in the quest for profit. No consideration is given to infrastructure issues. A school is proposed but no mention of doctors, public transport and other supporting services. There is no mention of a firm plan for these. The Core Plan (Jan 16) notes improvements to the A350 at Yarnbrook. However, the increased traffic associated with the proposed allocations will result in further gridlock of the area from Yarnbrook through to the town centre and possibly beyond. The 'holistically planned' upgrade of Drynham Lane and/or Drynham Road is meaningless and would in any event be a disaster. It would ruin a peaceful area with excessive traffic with nowhere to go other than the already saturated traffic flow on the A363 or the heavily used 'rat run' that Wiltshire Drive has become. Traffic management in the Trowbridge area is already chaotic and the proposals will simply compound the situation. The plan recognises the List II status of Drynham Lane Farmhouse which is welcomed. However, it makes no mention of the Farmhouse and outbuildings in Drynham Road which are known to house bats and other protected species and warrant similar HIA consideration. The Plan is Justified The Plan is not considered Justified. There is no (that I am aware of) comparison with alternative options or indeed any alternative options presented. Furthermore, 'proportional evidence' for the plan is at best weak or at worse absent. This component of the plan could usefully be strengthened to provide informed consideration. The plan therefore presents as a 'fait accompli'. There is much reliance on mitigation actions to known issues which have not been adequately explored or developed. Similarly, the plan states 'expectations as a significant employment and strategic service centre'. These have been the expectation of the Council for over thirty years and</p>				

	<p>while some much needed amenities have been added, the reality is the situation is in decline and promises to remain so. I have heard it said that businesses consider Trowbridge as a dead end backwater. Harsh maybe, but the point being that there is no work for the occupants of the proposed housing so they will mostly have to travel outside the area. With a poor road network and just three river crossings of the Avon to where work might be, the whole thing becomes unattractive and will severely impact the nearby towns of Bradford on Avon and Melksham. In this sense the plan is not justified as it does not address any bigger picture issues. It just focusses on how to get as many houses as possible into our area!</p> <p>The Plan is Effective</p> <p>The plan could well be deliverable but at a cost to our environment and it is not the deliverable the residents wish to see at this juncture. As with any plan there will be risks. Resolution of these seems to rest on an 'it will be alright' approach. Until the bigger picture issues and risks are addressed, the plan does not appear effective.</p> <p>The Plan is Consistent With National Policy</p> <p>The Council and its Planners obviously consider the plan is in accordance with the National Policy. I am not informed enough to either agree or disagree with this position. However, I make the observation that there must be alternative and better ways of delivering the policy than that presented in this plan. For instance why do 700 of the 900 houses 'over' the original plan have to be in Trowbridge? Wiltshire is a big County and there must be alternative site(s) available.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2374	Consultee Rangeford Strategic (Westwells) Ltd	Agent Mr Mervyn Dobson Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132530	H D Town Planning Ltd Person ID: 1006176	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2, pp 3.1-3.8 & 4.1-4.48; Site Land South of Westwells Road, Neston, Corsham		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst the earlier paragraphs of the Wiltshire Housing Site Allocations Plan (WHSAP) attempt to provide a summary of the background to the preparation of the Plan including, importantly, the higher tier Wiltshire Core Strategy (WCS) (approved in 2014, the overall approach taken in the identification of sites is considered to be unsound as it fails to take account of a number of highly important considerations which stem not only from the WCS but also from gradual, but important, shifts in central Government policy, particularly as this relates to brownfield sites. To demonstrate this it is necessary to review briefly some of the WCS policies. The most important factor to bear in mind so far as the WCS is concerned is that:-</p> <p>(i) The overall housing total contained in Policy CP2 is a minimum. Hence the reference in the first paragraph of the Policy to “at least 42,000 homes” a fact which is also referred to in more detail in the Inspector’s Report on the overall housing numbers; Paragraph 81 of his report notes that:-</p> <p>“..... I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the Plan period with the flexibility to deliver more.”</p> <p>(ii) The housing figures for the individual Community Areas (CAs) set out in Policy CP2 of the WCS are an indicative requirement and therefore because of the need for the flexibility to go above the minimum 42,000 homes referred to above, they should not be regarded as ceilings above which further development should not be considered. The WHSAP fails to acknowledge this fact and instead operates using the numbers for each of the CAs as a ceiling (see below).</p> <p>In addition to these two important principles it is as well to draw attention to the fact that the Plan period (2006 – 2026) now has less than 10 years to run and is therefore not in accordance with the advice in Paragraph 157 of the NPPF; this states that “crucially” plans should be drawn up over an appropriate timescale, preferably a 15 Year horizon to take account of longer term requirements, and be kept up to date. In the context of this last point it should be borne in mind that since the approval of the WCS central Government has made it clear that it wants to boost housing supply to in excess of 250,000 units per annum. To that end it has recently released (14th September 2017) a consultation draft on how to undertake Objectively Assessed Housing Needs which includes a higher annual figure for Wiltshire (2,227pa) than the figure which is contained within the WCS (2,100pa). Both of these factors suggest that it is important for the WHSAP process to look positively at all aspects of housing delivery and not just use the process as one which seeks to impose a cap on development; this applies to all settlements be they Principal Settlements right down to Small Villages, provided the opportunities are there for a sustainable form of development.</p> <p>We believe that this particularly applies to brownfield development opportunities where central Government has over the last 5 years sought to place increasing emphasis particularly in the context of delivering more housing. First in the NPPF Paragraph 17 which sets out 12 housing principles; the eighth bullet point specifically encourages the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. In this vein Paragraph 111 goes on to state:-</p>				

“Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.”

It is relevant to note here that the NPPF refers not just to decisions but also to policies suggesting that local planning authorities should not just leave these matters to landowners but should actively promote brownfield land where such sites are known to be available and deliverable through the Local Plan (& Core Strategy) process.

It should also be noted that following on from the last sentence of Paragraph 111 of the NPPF, Policy CP2 of the WCS contains just such a target for housing delivery from brownfield sites (35%). According to Topic Paper No. 3 produced by the Council as supporting material, over the period 2006 – 2015 this target had not been met, with only 29% of completions coming from this source (see Paragraph 5.15). Moreover it is not clear that this source (identified as windfalls) actually represents brownfield land or just houses which have come forward on unallocated sites.

For the future, where there are likely to be a greater proportion of completions coming forward from strategic greenfield sites (such as those around Chippenham and Trowbridge), it seems highly likely that this figure will fall so that the 35% target for brownfield completions will be ever further away.

Since the publication of the NPPF both the Coalition and the current Government has placed even greater emphasis on housing delivery from brownfield sites. This includes first a Consultation Paper “Building More Homes on Brownfield Land” issued before January 2015. In the introduction to this paper Paragraph 7 states:-

“Brownfield land suitable for housing has a vital role to play in meeting the country’s need for new homes while protecting the countryside, and for this reason the Government wants to maximize the number of new homes on suitable brownfield land”.

Paragraph 8 continues:-

“The planning systems plays a key role in facilitating housing, and local planning authorities through their policies and decisions have the potential to drive up the number of homes coming forward on brownfield land. Historic data suggests that there is enough suitable brownfield land to accommodate up to 200,000 homes, and the Government wants to see local planning authorities take a proactive approach to realising this potential, through the use of local development orders.” (our emphasis)

The Paper then goes on to promote the wider use of brownfield Registers and local Development Orders with authorities identifying potential sites which are deliverable, free of constraint, and capable of developing (more than 5 units) (see Paragraph 14).

This was followed in December 2015 by a further paper on proposed changes to the National Planning Policy Framework which included questions on supporting housing development on brownfield sites by the use of brownfield registers, which at that stage were included in the Housing & Planning Bill (now an Act). Paragraph 22 of that Paper states:-

“To ensure that all possible opportunities for brownfield are pursued we propose to make clearer in national policy that substantial weight should be given to the benefits of using brownfield land for housing (in effect a “presumption” in favour of brownfield land). We propose to make it clear that development proposals for housing on brownfield sites should be supported unless overriding conflicts with the Local Plan or the NPPF can be demonstrated and cannot be mitigated.”

Following this, central Government pursued the idea of improving brownfield land registers (introduced in 2004) by setting out the legislation making them mandatory and by introducing the possibility of Council’s granting permission by the use of Orders for the principle of residential development; these powers are explained in the NPPG (Reference ID 59-001-20170728 Paragraphs 1 – 32 and ID 58-001-20170728 Paragraphs 1 – 48). It is expected that all authorities will have completed this process by the end of 2017.

Additionally the White Paper “Fixing the Broken Housing Market” issued in February 2017 identified the importance of using brownfield sites to boost housing production. In the Chapter 1 Summary the fifth bullet point identifies the need to maximize the use of brownfield land with Paragraph 1.3 noting that plans do not always encourage a sufficiently wide range of sites to come forward. These points are elaborated upon in Paragraphs 1.24 - 1.25 with the first sentence making clear that:-

“We must make as much use as possible of previously developed land (brownfield land) for homes – so that this resource is put to productive use, to support the regeneration of our cities, towns and villages, to support economic growth and to limit the pressure on the countryside.”

Paragraph 1.25 goes on to state:-

“Going further, the presumption should be that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as flood risk).”

All of this change to central Government policy on brownfield land sets a context for an examination of the WHSA DPD to see whether this advice has been carried through into practice by the Council. A starting point is the WCS since this provides the higher tier framework for the WHSA DPD.

We have already noted that Policy CP2 of the WCS is drafted in terms of minimum housing numbers and that it also contains a brownfield target which has yet to be met. Additionally it should be noted from the WCS Policy CP1 that settlement boundaries around all settlements above Larger Villages will be important in identifying land and that outside such boundaries development will not normally be permitted unless it falls within the “exceptions” identified in Paragraph 4.25. Small Villages have no settlement boundaries and development is limited to 5 or fewer dwellings and are therefore expected to play little or no part in the WHSA DPD.

The supporting text to Policy CP2 identifies sources for new homes in Paragraph 4.24 including strategic allocations in the WCS, retained Local Plan allocations, existing commitments, regeneration projects, business expansion plans, sites identified in the WHSA DPD and Neighbourhood Plans, and windfall sites. Paragraph 4.25 identifies additional sources of supply which it states are to respond to local circumstances and national policy including additional employment land (Policy 34), Military Establishments (Policy 37), Development Related to Tourism (Policies 39 and 40), Rural Exceptions Sites (Policy 44), Specialist Accommodation (Policies 46 and 47) and supporting Rural Life (Policy 48). Interestingly there is no policy dealing specifically with brownfield land albeit much of the brownfield land in Wiltshire is Military (or former Military) land and is presumably covered by Policy 37. The site at Neston falls into this category (see below) but in theory Wiltshire does not have a specific policy on re-use of brownfield land which helps maximize housing delivery.

Policy 37 is the closest to a brownfield policy and therefore should be quoted in full. It states:-

“New development and changes of use as operational facilities that help enhance or sustain their operational capability will be supported.

Redevelopment, conversion or change of use of redundant MoD sites and buildings will be supported provided they are well related to an existing settlement in terms of both location and scale. Sites that are removed from settlements should only be considered where the existing buildings and infrastructure on the site are suitable for redevelopment, conversion or change of use. Redevelopment proposals will not exceed the existing building footprint and floorspace unless they are well located to an existing settlement. The focus will be on employment-led development and other uses should be determined through a masterplanning approach with the local community.

Development at operational or redundant sites should enhance the overall character of the site. All development at operational or redundant sites should mitigate any adverse impacts on local infrastructure, and not erode the character of the surrounding area. All proposals must ensure that the cultural and historical significance of the military facilities located on the site are understood and inform the scope of future development of that site.”

The Policy itself is not entirely clear that it applies to redundant MoD sites which have already been sold and the supporting text suggests that any redevelopment process needs to go through a Master Planning exercise. Significantly the policy also says that preference will also be given for employment uses (as opposed to residential) although the reasons for this are not stated anywhere in the documentation. To that extent the Policy does not accord with the NPPF or the latest policy statements on brownfield land in the White Paper (as quoted above).

However, setting this aside for the moment, it is relevant now to see how this “flexibility” has been interpreted in the WHSA DPD. At the outset it should be stated that we do not believe any allowance has been made for the emergence of brownfield sites either in the Objectives for making allocations, or in the Housing Delivery Strategy; this latter includes a numerical analysis of needs based on the minimum requirement and the site selection process has been heavily influenced by the settlement hierarchy and settlement boundaries. It is clear from reading Sections 3 and 4 of the WHSA DPD that no effort has been made to identify brownfield sites at all in the context of meeting housing requirements. Despite the fact that there is a specific target for housing from brownfield sites in Policy CP2 of the WCS, maximizing delivery from this element simply does not feature in the approach taken, despite also the increasing emphasis placed on this source by central Government. We would have expected this to have been one of the basic objectives in terms of identifying new housing allocations but, apart from the cursory, rather dismissive reference in Paragraph 3.6 of the WHSA DPD, previously developed land is ignored for the purposes of land search. It is true that brownfield sites are discussed in Paragraphs 5.17 – 5.35 of the Housing Topic Paper No. 3 but this is primarily in the context of delivery and justification for a windfall site allowance, rather than positively identifying such sites.

The basis of the Plan appears to be twofold:-

(i) To ensure that the overall housing numbers and allocations are sufficient to at least meet the minimum indicative requirements for each Community Area (CA) and subsequently of the 3 HMAs.

(ii) To focus on the Settlement Hierarchy when making new housing allocations.

In reality the methodology has meant that where housing numbers meet the minimum indicative housing figures in CAs no further work is undertaken to identify other potential sites. This is abundantly clear from Paragraph 4.24 which states quite openly:-

“The rationale for the Plan is to supplement housing land supply. This is a strategic priority stemming from the WCS. The spatial strategy expects development at Large Villages to respond to local needs. At the same time it is Government and the Council’s wish to give direct power to local communities to articulate their own visions for their area, to define and respond to their own local need. Therefore in the absence of a strategic priority, where land supply can meet objectives of the Plan without allocating sites at villages then it should not”.

Whether there are any sustainable locations in Large or Small Villages which could accommodate housing on brownfield sites, is simply not pursued if the overall minimum housing numbers are achieved. Such an approach we would say is neither positive, justified or effective; nor is it consistent with national policy.

The effect of this numerically based approach also carries through into the settlement hierarchy based principle which also militates against brownfield sites. In this case as Small Villages have no settlement boundaries and are limited to small scale development they are simply not examined in the WHSA DPD. Paragraph 4.16 makes this point clear as follows:-

“Housing Development at Small Villages is required to take the form purely of limited infill. House building will be small in scale, for sites of single figures, and the Plan does not seek to identify such sites.”

Again this militates against the identification of brownfield sites; and again it is neither positive, justified or effective in delivering Government policy.

Of course it may be argued that brownfield sites do not have to be identified and could come forward at any stage under WCS exceptions policies. However, this is a weak line of argument for a number of reasons. First, Paragraph 111 of the NPPF makes it clear that policies should be promoted which bring forward and identify brownfield sites and that Councils should be proactive in bringing forward such sites. Secondly, the Council do not actually have a policy which specifically refers to brownfield sites being used for housing; Policy 37 refers only to Military Establishments and then primarily in the context of employment uses. Where there are obvious brownfield sites which have been promoted for housing through the SHLAA (such as the objection site) this should be properly examined and allocated in the forward planning process. The larger the site the more important this becomes. Failure to undertake this task properly when making such assessments and allocations further undermines the whole selection process. Further reference will be made to this below.

Having identified these problems in the approach taken by the Council, we would strongly assert that at the general level, the Plan is unsound because it has not been positively prepared, is not properly justified in the context of brownfield land, is not effective in seeking to maximize housing production from sustainable and brownfield sites; and is fundamentally inconsistent with Government policy.

Having made general comments about the procedure for identifying housing sites generally and the lack of attention to brownfield sites we want to proceed by seeing how the approach has affected the Corsham Community Area which is set out in WHSA DPD and the supporting documents with particular reference to a potential housing site between Rudloe and Neston (which will be referred to as the objection site).

The simplest way of summarizing the Council’s position is to say that as both Corsham Town and the remainder of the Community Area already had housing sites which exceed the indicative housing figure no further sites were considered. However, it is interesting to note the approach in the DPD which has been taken to drawing settlement boundaries which are shown at the rear of that document. At the outset it should be stated that the settlement of Corsham, which is classified as a second tier Market Town, is surrounded on its western and southern sides by a large amount of military buildings and MoD land which links up the main settlement to Rudloe and to Neston. The former is regarded as a large village with a settlement boundary (but excluding employment land) and the latter is classified as a Small Village. However, the true amount of development and the actual separation from each other can be seen on the OS plans and is readily apparent on the ground. These areas of development and brownfield land can easily be distinguished from the open arable land which lies to the North and East. However, for the purposes of defining settlement boundaries much of this development is simply ignored even where it has recently been redeveloped, such as on parts of the MoD Corsham and at MoD Royal Arthur; the latter is now being developed as a retirement community. Not only does this decision to ignore recent redevelopment and MoD buildings seem completely illogical but it also generates a wholly artificial sense of separateness between the settlement boundaries which does not exist on the ground. Thus, for example Neston and Rudloe are effectively joined up by development and any gap between Neston and Corsham is narrow at best and effectively the two are joined by brownfield MoD land. And yet the settlement boundaries amendments continue to ignore these facts and treat them all as separate settlements.

	<p>It can be seen that part of the reason for this derives from the methodology used in defining settlement boundaries as can be seen from Paragraph 7.11 of Topic Paper No. 1 which states that:-</p> <p>“This does not mean that employment land should be excluded from settlement boundaries in all types of settlement. Therefore the revised settlement boundary review methodology will exclude employment development at the edge of Large Villages.”</p> <p>This has apparently been done because Policy 35 of the WCS does not protect employment sites at Large Villages as it does in higher category settlements. However, in reality this approach fosters a wholly artificial approach to separation of settlements.</p> <p>This can be demonstrated quite graphically in relation to the objection site which we are seeking to promote which lies on the south side of Westwells Road at its junction Moor End; a plan is attached as Appendix 1 showing the brownfield site to the north together with a small area of greenfield land in the south adjacent to the Wadswick Green development. This is a site of approximately 6.1 hectares formerly owned by the MoD and used as a camp during WWII; the brownfield site comprises just under 5 hectares of this total. The buildings on the site have been partially demolished but the lower walls, foundations and roads are all evident on a site inspection. The Council accepts that this is a brownfield site and that it is subject to Policy 37 of the WCS as a former MoD site. It has previously had two earlier planning applications submitted on it, one for a mixed use scheme and one for employment; both have been withdrawn.</p> <p>Local residents have claimed that the site separates Neston from Rudloe but in reality the two are already linked on the Northern side of Westwells Road where a 1990s estate abuts the adjoining MoD employment area. The objection site lies on the south side of this road again adjacent to an MoD employment area and alongside a private road linking south westwards to the former Royal Arthur site (now known as Wadswick Green) which lies beyond the objection site. This site was also a brownfield site and originally received planning permission as long ago as 2008 and is now nearing completion. Bizarrely none of this very large area of development is shown as falling within a settlement boundary despite the overall character of the area being one of a mix of built up schemes very close to the edge of Corsham (and Rudloe). The site itself is therefore surrounded on three out of four sides by development and represents a brownfield site where there are no serious planning or other grounds against its redevelopment for residential purposes in accordance with central Government policy. As such this sustainably located site should be recognized as an important opportunity for residential development even though it might lead to the indicative minimum housing numbers for the Corsham CA being exceeded. This is precisely the sort of flexibility that is encompassed within the overarching WCS policy and one which the Inspector also recognized when he stated that such indicative figure should not be used prescriptively to prevent development from coming forward. It also complies with central Government advice. To make the Plan more effective, positive and in accordance with central Government policy the site should be specifically identified as a brownfield allocation on the Proposals Map and in Policy H2 of the WHSA DPD with an approximate capacity of up to 150 dwellings.</p> <p>To make the Plan more effective, positive and in accordance with central Government policy the site should be specifically identified as a brownfield allocation on the Proposals Map and in Policy H2 of the WHSA DPD with an approximate capacity of up to 150 dwellings.</p>
<p>Attached files (Please see Objective)</p>	<p>4729415 / 4729416</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The Plan as drafted is fundamentally unsound because of its failure to properly consider brownfield sites in accordance with central Government advice. This point needs to be elaborated upon in detail at the Examination since the approach taken by the Council is also operating to depress potential housing numbers which could otherwise be brought forward entirely in accordance with the Plan. The Council has demonstrably failed to adopt a proactive approach to re-use of brownfield land and this needs further explanation at the Examination. The objection site is a large site capable of accommodating about 150 dwellings and its omission needs a proper explanation by the Council.</p>

Comment ID:	2375	Consultee Mr and Mrs R and J C Hussey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132562	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We wish to object to the proposed development at Woodmarsh for the following reasons. In the Wiltshire Council Core Strategy, Core Policy 29, paragraph 2.4 Issues and Considerations it states that the land between Trowbridge and North Bradley would not be built upon as this is regarded as the "buffer" between Trowbridge and North Bradley.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2376	Consultee Mr and Mrs R and J C Hussey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132562	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are also concerned as to where the additional traffic would gain access onto the village road. This road is constantly busy and the additional vehicles would add to the congestion already being experienced.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2377	Consultee Mr and Mrs R and J C Hussey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132562	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The field on which the proposed housing is being considered often floods after heavy rain. It is effectively a natural flood plain. This would be lost if the housing was constructed and the water would have to find its own natural level which could cause some further problems.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2378	Consultee Barry King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I cannot agree that the Plan has been entirely positively prepared. The requirement to provide additional areas for building with the county is recognised but the distribution of these additional areas seems highly biased towards Trowbridge. Why so many here, and why not in other areas? Whilst Trowbridge is the county town, the influx of the developments proposed will, in the opinion of many I am sure, ruin the town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2379	Consultee Barry King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Coalescence			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The sites proposed for HMA destroy the separation between Southwick, North Bradley and White Horse Business Park. Discussion locally confirms that residents are against this concept. It is not considered to be in the best interest of those outlying areas or the Town. Similarly, Hilperton and Church Lane sites should be added into the equation. The boundaries agreed in the Wiltshire Core Strategy document represent a more appropriate position.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2380	Consultee Barry King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Brownfield			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No consideration appears to have been given to use of 'Brown Field' sites of which there are several. These should be first choice for redevelopment and not the consumption of yet more Greenfield sites. Developers should not be allowed to dictate their preference for Greenfield sites in the quest for profit.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2381	Consultee Barry King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No consideration is given to infrastructure issues. A school is proposed but no mention of doctors, public transport and other supporting services. There is no mention of a firm plan for these.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2382	Consultee Barry King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Core Plan (Jan 16) notes improvements to the A350 at Yarnbrook. However, the increased traffic associated with the proposed allocations will result in further gridlock of the area from Yarnbrook through to the town centre and possibly beyond. The 'holistically planned' upgrade of Drynham Lane and/or Drynham Road is meaningless and would in any event be a disaster. It would ruin a peaceful area with excessive traffic with nowhere to go other than the already saturated traffic flow on the A363 or the heavily used 'rat run' that Wiltshire Drive has become. Traffic management in the Trowbridge area is already chaotic and the proposals will simply compound the situation.</p> <p>With a poor road network and just three river crossings of the Avon to where work might be, the whole thing becomes unattractive and will severely impact the nearby towns of Bradford on Avon and Melksham. In this sense the plan is not justified as it does not address any bigger picture issues. It just focusses on how to get as many houses as possible into our area!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2383	Consultee Barry King	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The plan recognises the List II status of Drynham Lane Farmhouse which is welcomed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2384	Consultee Oxford Law	Agent Mr Peter Frampton Framptons	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132580	Person ID: 550322	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Semington		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Semington is a sustainable settlement which can accommodate a modest level of housing growth to maintain and enhance existing facilities and services. The provision of land for housing of a medium scale will support engagement of small and medium sized house builders – thereby improving the rate of housing delivery. Settlement boundaries should not be defined as a ‘tourniquet’ preventing new housing which is necessary to maintain and enhance the vitality of settlement – denying the opportunities for new households to locate in the village and contribute to village life. The land edged red on the attached plan included within the settlement boundary of Semington.				
Attached files (Please see Objective)	4729472				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To contribute orally to the consideration of settlement boundaries and to test the claimed soundness of the DPD.				

Comment ID:	2385	Consultee Barry King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	However, it makes no mention of the Farmhouse and outbuildings in Drynham Road which are known to house bats and other protected species and warrant similar HIA consideration.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2386	Consultee Barry King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Delivery and Plan Strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan is Justified The Plan is not considered Justified. There is no (that I am aware of) comparison with alternative options or indeed any alternative options presented. Furthermore, 'proportional evidence' for the plan is at best weak or at worse absent. This component of the plan could usefully be strengthened to provide informed consideration. The plan therefore presents as a 'fait accompli'.</p> <p>The Plan is Effective The plan could well be deliverable but at a cost to our environment and it is not the deliverable the residents wish to see at this juncture. As with any plan there will be risks. Resolution of these seems to rest on an 'it will be alright' approach. Until the bigger picture issues and risks are addressed, the plan does not appear effective.</p> <p>The Plan is Consistent With National Policy The Council and its Planners obviously consider the plan is in accordance with the National Policy. I am not informed enough to either agree or disagree with this position. However, I make the observation that there must be alternative and better ways of delivering the policy than that presented in this plan. For instance why do 700 of the 900 houses 'over' the original plan have to be in Trowbridge? Wiltshire is a big County and there must be alternative site(s) available.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2387	Consultee Barry King	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132552	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is much reliance on mitigation actions to known issues which have not been adequately explored or developed. Similarly, the plan states 'expectations as a significant employment and strategic service centre'. These have been the expectation of the Council for over thirty years and while some much needed amenities have been added, the reality is the situation is in decline and promises to remain so. I have heard it said that businesses consider Trowbridge as a dead end backwater. Harsh maybe, but the point being that there is no work for the occupants of the proposed housing so they will mostly have to travel outside the area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2388	Consultee Mr David Ogborne Planning Liaison Manager Wessex Water Person ID: 390498	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	water and waste infrastructure					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the consultation for the Site Allocations Plan, which supports the later stages of the Wilts Core Strategy plan period to 2026. We have been working with Wilts Council to review sites and make preliminary assessments on water and waste infrastructure. We note the sites that are now included in the allocations plan. There are a range of sites, which are subject to capacity constraints. These sites have previously been identified to Wilts Council and will require detailed appraisal work when promoted through the planning system. We note that there are a number of sites granted on appeal, which appear to fall outside settlement boundaries at a number of locations. Wessex Water will review strategic capacity for the larger allocations and examine smaller sites at the earliest possible stages through developer enquiries and planning consultations.</p> <p>Water Supply Longer term Water Resource plans are currently being updated, however capacity for this plan period is available to support these allocations in the current Local Plan. Further discussions are underway to ensure that we can continue to support catchment growth for the next plan review beyond 2026. Supply networks – We will identify points of connection and specify capacity improvements where the local distribution network cannot meet predicted demand.</p> <p>Waste Water The allocations plan will assist with treatment capacity planning, providing more definition to the location and timing of new development. Long term planning is essential to ensure that we can maintain headroom capacity at treatment works. Where extensions are required to meet demand we need time to plan design and construct new civil works. Discharge permits are also under review with revised consent limits. The removal of phosphates and nitrates will require a programme of works to selected sites with nutrient management plans to improve water quality in designated river catchments. These matters are subject to stakeholder and partnership arrangements emerging from the Local Plan to meet the Water Framework Directive and habitats regulations. Sewer networks – We will identify points of connection to foul and surface water systems. Where required capacity improvements will be defined and programmed to meet regulatory service levels. Developers will be required to fund off-site improvements with infrastructure charging approved through industry regulator OFWAT. We remain concerned over surface water discharges to public foul water systems and will make a formal objection to sites that seek surface water connections to the public foul system. We request that the Local Planning Authority and the Lead Local Flood Authority ensure that any site promoted through the planning system provides a satisfactory outfall for surface water. Viability of sites should also make allowance for any disproportionate investment that may be incurred by the sewerage undertaker to service new development sites. Discharging surface water to public foul systems directs unwanted investment in both network and treatment assets and does not comply with sustainable development under the NPPF.</p>					

	Where there are large land allocations we will consider the use of powers under the Water Industry Act 1991 to achieve a general system of sewerage to benefit all stakeholders. If any further information is required at this stage please advise.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2389	Consultee Mr Haydn Jones Planning Director Richborough Estates Person ID: 1132602	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	Housing Delivery Strategy				Justified Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>1. Introduction Richborough Estates is a successful land promotion business. We are promoting Land North of Pound Lane, Semington for a residential development of 75 dwellings and public open space. The emerging Plan does not propose to allocate the site for development. These representations relate to the emerging Plan's housing delivery strategy, which we consider to be unsound.</p> <p>2. HOUSING NEED & LAND SUPPLY EVIDENCE We do not consider that the evidence put forward by the Council on housing need or housing land supply is robust or even satisfactory to inform the emerging Plan.</p> <p>In terms of housing need and the five year supply, we do not agree that the Council's assessment is correct. It does not reflect the true housing need in terms of an objectively assessed figure, hence the instruction of the Core Strategy Inspector to make the housing requirement a minimum and "at least" figure. CP2 housing requirements have always been a 'minimum' requiring "at least 42,000 dwellings". For the words 'at least' to have any meaning, other housing therefore needs to come forward for development but this is entirely at odds with the approach taken to the draft HSAP whereby community area targets are taken as a 'ceiling'. This might have been the correct course of action at that time of the Core Strategy examination but it was predicated on the fact that the Council made assurances about publishing an update SHMA in early 2016 and undertaking an early review of the Plan. Neither of these have materialised as of September 2017. Our view is that the emerging Plan has not been positively prepared because it treats the housing requirements as a ceiling and resists the allocation of otherwise sustainable sites where there would be no harm to the WCS or spatial strategy.</p> <p>Regarding land supply, the Council relies on overly optimistic delivery rates from many sites, thus overstating the actual realistic supply. We have specific concerns about various sites within the supply, including the Hunters Moon site (no allocation or permission); Land South of Bradford Road, Rudloe (outline permission expires in little more than 6 months time and with this the inevitable delay there will be to the reserved matters and actually delivering housing); Langley Park/Foundry Lane (has failed to deliver for a decade); Rowden Park (very little progress); and Station Road, Westbury (no permission with previous permission having lapsed). Our concerns on these sites principally relate to the fact that they are unlikely to deliver within five years or delivery rates will be slower than the Council suggest.</p> <p>In respect of the method of assessing the five year supply, the Council relies on Liverpool, whereas Sedgfield is a more appropriate approach now the Core Strategy is more than halfway through its Plan period. The recent appeal decision (Hilltop Way, Salisbury) in the Southern HMA APP/Y3940/W/17/3173509 confirms this. IR para. 11. "However, with the application of a 5% buffer, based on the 'Sedgfield' method, which appears to be the Government's preference according to the PPG ... ". The Sedgfield approach would help provide the Council with a more realistic assessment of their five year supply situation. Consequently we do not accept the Council's approach to assessing supply using Liverpool.</p>			

Neither do we accept that the Council is a 5% authority for the purposes of an NPPF buffer. They have under-delivered for 7 of the last 10 years. That is persistent under delivery. The evidence suggests the position will only get worse in the near future. Consequently our view is that the Council is a 20% authority.

Paragraph 2.14 of the emerging Plan is quite clear that a central objective of the emerging Plan is to maintain a five year supply of deliverable sites in each of the HMAs. The starting point of this must be a realistic assessment of what the current five year supply is so that this can inform further site allocations. The Council does not have a realistic assessment and this calls into question how effective the emerging Plan is. There are also significant delivery issues at Trowbridge which are reflected in both the HSAP and the supporting evidence base. This is going to have huge implications for the NWHMA and the effectiveness of the HSAP, whether it is positively prepared and whether or not a 5 year supply can be maintained at all points during the plan period (required by PPG030).

3. North & West Wiltshire Housing Market Area

The emerging Plan's housing delivery strategy needs to be seen against the background of the Council having an adopted Core Strategy which was only found sound because the housing requirement is expressly provided as a 'minimum' figure. In fact the need to deliver at least 42,000 dwellings itself was only accepted by the Core Strategy Inspector because of the Council's agreement to undertake an early Plan review and the publication in early 2016 of a new SMHA.

The North & West Wiltshire HMA has a housing requirement of a minimum of 12,740 dwellings. The emerging Plan indicates that, along with the strategy for the two other HMAs, by focusing further allocations at higher tier settlements the Plan supports sustainable development sought by Objective 2 of the emerging Plan. We contend that it does no such thing as Objective 2 relates to demonstrating a rolling five year supply of deliverable sites, a matter that applies equally to rural areas as it does to larger settlements. PPG030 requires a rolling 5YR HLS at all points over a plan period.

Semington is situated within the Melksham Community Area (CA) of the North & West HMA and is defined as a Large Village. The emerging Plan makes no provision for allocations at Large Villages within this CA. We do not consider this to be the correct approach as the emerging Plan fails to be positively prepared, and this is discussed further in Section 4 below.

4. Melksham Community Area

As with the other HMAs, the North & West is divided into a number of Community Areas with (as noted above) Semington falling within the Melksham CA. The housing requirement for the CA is a minimum of 2,370 dwelling, of which 2,240 should be at Melksham.

One of the justifications for not allocating sites in some Large Villages is because of the affect this could have on the spatial strategy. In the case of the Melksham CA and our site at Semington we do not believe that is a tenable argument. Our proposals for 75 dwellings do nothing to threaten the spatial strategy of the Core Strategy. The main focus for development in the Melksham CA is on Melksham itself and the provision of 75 new dwellings at Semington is not going to adversely affect this spatial distribution, especially as the requirement for Melksham is either completed or committed already.

There is an acute affordable housing crisis in Wiltshire, something we deal with further in our objections to Policy H2 and the non-allocation of our site at Semington. Over the last 20 years very few planning permissions have been granted in Semington. Rather than an allocation of our site for 75 dwellings being an issue, it is entirely in line with the Core Strategy's 'minimum' approach to the housing requirement. It is evident from reading the Core Strategy Inspector's Report that he saw the housing requirements for the Community Areas as being viewed flexibly and thus should not be treated as a ceiling nor seen as a position on the housing needs of a settlement. Indeed, when the Inspector reported on the Melksham CA he noted at Paragraph 286 that "the volume of intended housing is expressed indicatively and appropriately which provides for the overall level of provision " One can conclude from this that it means flexibility in terms of both internal Melksham CA figures and across Community Areas. The Sustainability Appraisal should have also tested a 'reasonable alternative' of further allocations to at least test what this could mean for housing and affordable housing delivery. Testing reasonable alternatives to determine the most appropriate strategy is set out in The Environmental Assessment of Plans and Programmes Regulations 2004 and NPPG, Paragraph 001 Reference ID: 11-001-20140306.

Furthermore, allocating our site would also be in line with the NPPF policy of boosting significantly the supply of housing. Applying flexibility in the way the Core Strategy Inspector intended would help boost the supply of housing in Wiltshire and would not be outwith the minimum approach to the housing requirement.

	<p>The housing requirements are all indicative and both the overall housing number and Melksham CA figure are minimum requirements. There is no embargo on more housing in the Melksham CA, thus no over-arching policy bar within the Core Strategy to allocating our site for 75 dwellings.</p> <p>Without further site allocations the Council will not deliver the level of housing they envisage. The flexible approach further allocations will bring will ensure that there is a genuine rolling five year supply. Without this flexibility the Plan is not advocating the most appropriate strategy and therefore it is not justified.</p> <p>The bulk of recent housing completions in the Melksham CA are associated with the build out of Policy H6 from the former West Wiltshire District Local Plan - First Alteration (2004), however this is simply meeting needs from the old plan period (1991 onward), not future requirements through to 2026. This is a further reason why additional allocations are needed to meet Melksham's future housing needs.</p> <p>Changes required to the housing delivery strategy</p> <p>The problem the emerging Plan has is that in getting the Core Strategy adopted the Council effectively put in place a 'short-term fix' Plan that should have be brought up-to-date through the publication of a new SHMA some 18 months ago, coupled with an early Plan review. Neither of these have taken place.</p> <p>A central plank of the emerging Site Allocations Plan is supposed to be the allocation of sites to provide a continuing rolling five year supply of deliverable sites. The starting point for considering how many, and which, sites should be allocated has to be a robust assessment of the five year supply to understand how the Council is delivering new housing. The Council do not have this and therefore one of the most important pieces of evidence that should underpin the emerging Plan is incomplete.</p> <p>The Council should rectify the issues within their assessment. Further land should then be identified for housing and one such site is Land at North of Pound Lane, Semington.</p> <p>At present the emerging Plan fails the positively prepared, justified and effective tests of soundness. This can be rectified by taking the approach we advocate above.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Richborough Estates is one of the country's most successful strategic land promotion businesses. We have extensive knowledge of the housing market in Wiltshire and believe we are well positioned to assist the Inspector in helping them come to their conclusions on the soundness of the Site Allocations Plan.</p>

Comment ID:	2390	Consultee Mr Haydn Jones Planning Director	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Richborough Estates Person ID: 1132602		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Introduction Richborough Estates is a successful land promotion business. We are promoting Land North of Pound Lane, Semington for a residential development of 75 dwellings and public open space. The emerging Plan does not propose to allocate the site for development. In our objections to the emerging Plan's housing delivery strategy and settlement boundary review we have set out why we believe further site allocations need to be made, and in particular why the allocation of our site at Semington would not threaten the spatial strategy of the Core Strategy as the overwhelming majority of new housing in the Melksham Community Area would continue to be directed towards Melksham itself. As currently written we consider that the emerging Site Allocations Plan is not positively prepared, justified or effective in relation to both the housing delivery strategy and the failure to allocate additional sites, including ours. We therefore object to the fact that Policy H2 has not allocated Land North of Pound Lane, Semington for 75 dwellings (Location Plan attached as Appendix 1 to these representations). These representations evidence why the site would deliver sustainable development and therefore why it should be allocated for residential development.</p> <p>2. Draft Policy H2 It is acknowledged that the draft policy does allocate some additional sites within the North & West Wilshire HMA. We, however, do not consider this supports the notion that H2 is sound. To make the policy sound, our site North of Pound Lane, Semington should be included as an allocation for 75 dwellings. We have reviewed the content of the Melksham Community Topic Paper and Topic Paper 2: Site Selection Process Methodology; but do not consider either is an adequate piece of evidence to justify the lack of new site allocations within the Melksham CA, and more precisely at Semington.</p> <p>3. Land North of Pound Lane, Semington – recent history As the Council is aware Land North of Pound Lane has recently been the subject of a public inquiry following the refusal by the Council of a planning application for 75 dwellings, open space, play areas and access. The decision on that appeal is awaited. As the Council is equally aware, there are no technical objections from any statutory consultees to our proposals for the site. The opportunity now exists for the Council to allocate the site and amend the settlement boundary of Semington through this site allocations process. A copy of the Illustrative Masterplan for our proposals is contained in Appendix 2 of these representations. Importantly the very fact that an application was submitted supported by a large portfolio of evidence (expanded on further as part of the appeal) means that the site is available now and achievable. Furthermore, in our view the site is in an appropriate location for development and accessible to jobs, services and facilities. Therefore it is deliverable.</p> <p>4. Land North of Pound Lane, Semington – our proposals The description of development for the planning application does not really do the proposals justice.</p>				

Of the 75 dwellings, 30 will be affordable homes (40%). There is an enormous affordable housing problem in Wiltshire, not helped by the fact that some sites (especially large ones) are failing to achieve a policy compliant level of affordable housing. We are proposing an above policy level of affordable dwellings to assist in the Council meeting their acute affordable need.

The affordable housing that this site will deliver is a major social benefit for the area and therefore a very positive attribute in the sustainability balance.

Regarding the dwellings proposed, the scheme would comprise a mix of 1, 2, 3 and 4 bed properties including 17 bungalows, 9 of which would be affordable. The Wiltshire Housing Strategy notes the number of people over the age of 75 will increase from 44,400 in 2015 to 76,400 in 2025. The Council's own Housing Strategy makes clear that one of their priorities is to "Increase the supply of housing for older people"; and for those requiring housing support, over one-third of such households require a bungalow. The incorporation of bungalows is therefore another significant social benefit.

Almost half of the site (44%) would be retained as open space. Nearly all of that space would be linked together in a single swathe of land around the outer edge of the site, so that it can be enjoyed as a single experience. Within the open space there would be a canal side park, two children's play areas, a balancing pond feature, a wetland area and a restored WWII pill box.

The canal side park is more than just an area of standard open space. It provides an interface between the village and the canal responding to place-making and design guidance which promotes new development creating places that are individual and which respond to their context. In proposing the canal side park we have sought to provide a unique development delivering a sense of place for both occupiers and other residents of the village, as well as canal users.

As to be expected the development would make various off-site financial contributions including funding a new classroom at the village primary school.

In terms of the site's location within Semington, it is within 200m of the primary school; and the village has a thriving public house, a part-time post office, church, its own industrial estate and significant office development.

Semington lies just to the south west of Melksham/Bowerhill. This close relationship means there is accessibility to jobs, services and facilities. In particular Bowerhill provides over 4,000 jobs and the site is within 2km of this huge employment resource. Arguably, there is no village in Wiltshire that has such good access to the level of jobs available at Bowerhill.

The most direct route to these jobs is via a car free bus and cycle route so there is a genuine alternative to car use. The bus service connects Semington with both Melksham and Trowbridge; and has a frequency that would be the envy of most rural villages.

Of course as well as those moving to the development having excellent accessibility to Bowerhill, there are other indirect and induced employment/economic benefits arising from the proposals. These include:

£2.1m uplift in gross annual income from new employed residents;

£1.2m annual household retail expenditure;

£700,000 uplift in annual leisure expenditure;

£375,000 expenditure upon first occupation to make a house a home; and,

27 jobs supporting retail and leisure related jobs annually.

Further financial benefits are £100,000 additional Council Tax revenue per annum; £35,000 total New Homes Bonus payment to Wiltshire Council; and circa £400,000 in CIL contributions (precise figure will reflect eventual reserved matters scheme).

Even before the operational phase of the development there will be direct and indirect economic benefits from the construction stage of the 75 dwellings. These are estimated as:

Circa £9.9m of investments in the construction;

35 Full Time Equivalent (FTE) jobs per annum (28 direct net additional FTE jobs including 19 in Wiltshire and 14 indirect/induced FTE jobs including 5 in Wiltshire); and,

£9.0m GVA economic output uplift locally;

The construction and operational phases of the proposals have very clear and significant economic benefits that must be weighed in the planning balance.

There is no need in these representations to rehearse the three strands of sustainable development or the balancing exercise that should be undertaken when assessing whether proposals are sustainable development as the Council will be fully aware of how to approach such as

	<p>assessment. We have, though, summarised below the economic, social and environmental aspects of our scheme for Land North of Pounds Lane.</p> <p>ECONOMIC In excess of 4,000 jobs available within 2km, accessible by non-car modes of travel. £2.1m uplift in gross annual income from new employed residents. £1.9m annual household retail expenditure and uplift in annual leisure expenditure. 27 jobs supporting retail and leisure related jobs annually. £375,000 expenditure upon first occupation to make a house a home. Circa £9.9m of investments in the construction and £9.0m GVA economic output uplift locally. Construction requires 35 FTE jobs per annum.</p> <p>SOCIAL Additional housing choice to the local area. 40% affordable housing. Significant area of public open space including a canal side park. Incorporation of bungalows. Funding for a new classroom and the local primary school. Increase in health and wellbeing opportunities through accessible public open space. Potential increase in personal wealth allowing possible access to greater social opportunities such as new or better services.</p> <p>ENVIRONMENTAL 44% of the total site area retained as open space. Inclusion of 0.413ha of wetland habitat (within the open space). New hedgerow planting considerably greater than the small amount lost to facilitate access (just 0.6% of the current hedgerow would be lost). Accessible to a range of jobs, services and facilities by a mix of walking, cycling and public transport. As noted above we are of the view that the emerging Plan is unsound in relation to the housing delivery strategy and the lack of new allocated sites. Land North of Pound Lane, Semington can deliver sustainable development and therefore should be allocated for 75 dwellings and public open space as proposed by Richborough Estates. There is no reason not to allocate the site and therefore without it the emerging Plan remains unsound. Changes required to Policy H2 At present, we consider the emerging Plan to be unsound as it is not positively prepared, justified or effective. To overcome this Land North of Pound Lane, Semington as shown in Appendices 1 and 2 of these representations should be allocated for 75 dwellings and included in Policy H2. In addition the settlement boundary for Semington should be amended to reflect the allocation.</p>
<p>Attached files (Please see Objective)</p>	<p>4729689 / 4729691</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Richborough Estates is one of the country's most successful strategic land promotion businesses. We have extensive knowledge of the housing market in Wiltshire and believe we are well positioned to assist the Inspector in helping them come to their conclusions on the soundness of the Site Allocations Plan.</p>

Comment ID:	2391	Consultee Mr Haydn Jones Planning Director Richborough Estates Person ID: 1132602	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		Settlement Boundary Review		Positively prepared	Justified
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>1. Introduction Richborough Estates is a successful land promotion business. We are promoting Land North of Pound Lane, Semington for a residential development of 75 dwellings and public open space. The emerging Plan does not propose to allocate the site for development. These representations relate to the emerging Plan's settlement boundary review, which we consider to be unsound.</p> <p>2. The Need to Allocate Additional Sites for Residential Development We have set out in our objection to the housing delivery strategy our concerns over the Council's assessment of their five year supply situation. We consider it to be inadequate and therefore the Council will not deliver the level of housing they envisage. In view of this, further site allocations need to be made in the Site Allocations Plan to ensure that there will be a genuine rolling five year supply through a flexible approach to development. We therefore do not consider that the Council has undertaken a comprehensive review of settlement boundaries as claimed in Paragraph 1.3 of the emerging Plan. Without a change in direction, the emerging Plan is neither positively prepared nor effective. Furthermore, without the flexibility it is not the most appropriate strategy and therefore not justified either. We have reviewed the content of the Melksham Community Topic Paper and Topic Paper 2: Site Selection Process Methodology but do not consider either is an adequate piece of evidence to justify the lack of new site allocations within the Melksham CA, and more precisely at Semington.</p> <p>3. Land north of Pound Lane, Semington As the Council is aware, we are promoting Land North of Pound Lane, Semington for 75 dwellings and public open space. This site should form one of the additional site allocations needed to bring flexibility (and a robust five year supply position) into the Council's housing delivery. In our objection to Policy H2 for the non-allocation of our site we have set out the strong sustainability credentials of our proposals including a proposed level of 40% affordable housing and a mix of dwellings including starter homes, bungalows and larger family dwellings. In particular the provision of 30 new affordable homes, including 9 bungalows is a significant social benefit set against the background of an acute affordable need within Wiltshire. Clearly the allocation of the site would require the settlement boundary of Semington to be amended to include the site within the urban area. At present the emerging Plan makes no such amendment. By implication therefore, this part of the Plan also fails the positively prepared, justified and effective tests of soundness because more allocations are needed and one of these is our Semington site. Changes required to the settlement boundary The settlement boundary for Semington should be amended to include our site North of Pound Lane, Semington within the confines of the Semington urban area. This would mirror its allocation for 75 dwellings and public open space. The boundary should be redrawn to reflect the location plan attached to these representations as Appendix 1.</p>			

Attached files (Please see Objective)	4729690
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Richborough Estates is one of the country's most successful strategic land promotion businesses. We have extensive knowledge of the housing market in Wiltshire and believe we are well positioned to assist the Inspector in helping them come to their conclusions on the soundness of the Site Allocations Plan.

Comment ID:	2392	Consultee Rachel Sandy Asset Manager South West Highways Agency Person ID: 903251	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I refer to the public consultation on the Pre-submission Draft of the Wiltshire Housing Site Allocations Plan (the Plan). Set out below is Highways England's formal response to the consultation.</p> <p>Highways England has been appointed by the Secretary of State under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network. Within Wiltshire, the Strategic Road Network comprises the M4 motorway and the A36 and A303 trunk roads.</p> <p>The Strategic Road Network is a critical national asset and Highways England is responsible for ensuring that it operates and is managed in the public interest, both in respect of current activities and needs, and in providing effective stewardship of its long- term operation and integrity.</p> <p>Policy</p> <p>Highways England policy relevant to the acceptability of new developments is set out in Department for Transport Circular 02/2013 – “The Strategic Road Network and the Delivery of Sustainable Development”. Paragraphs 9, 10 and 11 of the Circular summarise the correct approach to development proposals as follows:</p> <p>“9. Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.</p> <p>10. However, even where proposals would not result in capacity issues, the Highways Agency’s prime consideration will be the continued safe operation of its network.</p> <p>18. Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs”.</p> <p>Applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, ie, a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact.</p> <p>These principles are reflected in the NPPF which (at paragraph 162) requires that local planning authorities should work with other authorities and providers during the plan making process to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands.</p> <p>The aim of this cooperation is to arrive at a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development. (NPPF paragraph 181).</p> <p>Pursuing sustainable development requires careful attention to viability and costs. The sites and the scale of development identified in the plan should not be subject to such a scale that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements</p>				

likely to be applied to development, such as infrastructure contributions or other requirements, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. (NPPF paragraph 173)

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. (NPPF paragraph 177).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. (NPPF paragraph 32).

For the Plan to satisfy the requirements of NPPF it would therefore need to be supported by an assessment of the infrastructure necessary to ensure that traffic impacts are not severe. Highways England would be content with the proposed allocations if the identified infrastructure satisfied the requirements of Paragraph 9 of Circular 02/2013.

The Local Highway Authority will have their own criteria and it should also be noted that the requirements of the Plan, in terms of providing the necessary housing, may require additional infrastructure to be identified, particularly in relation to existing issues which would be beyond the remit of Highways England to consider.

The Plan

The purpose of the Plan is established in the Wiltshire Core Strategy (WCS) to:

Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and

Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five-year land supply in each of Wiltshire's three HMAs over the period to 2026.

It is the second of these that is of specific interest to Highways England. The Plan is identifying additional sites (over and above those identified in the original 2006-2026 Plan) in order to maintain a 5 year housing land supply. The identification of additional sites has become necessary as some of the original sites have not come forward or been developed as originally proposed.

It is important to note that sites in Chippenham are specifically excluded from this Plan as they were considered under the separate Chippenham Site Allocations Plan which was adopted on 14th March 2017. Highways England worked closely with Wiltshire Council to develop the transport evidence base for that Plan. There Highways England's specific interest was focussed on M4 Junction 17 and full comments were provided on that Plan at the time.

Matters arising from the Pre-submission Draft of the Plan

Impact on A36

There are other sites in villages to the north and south of the A36 as it passes through Wiltshire. Though these sites are mostly small in nature, the cumulative impact would add to the traffic to the A36 and this impact on the operational performance is not known. For example, there are 200 dwellings proposed in the Warminster area. This will need consideration in development of the evidence base.

Transport Evidence Base

Wiltshire Council is currently in the process of developing the transport evidence base to support the development set out in the DPD. However, until that work is complete, Highways England is unable to confirm the scale or cost of the necessary highway interventions, or whether all parts of the Strategic Road network likely to be impacted by the development included in the Plan have been identified.

As recorded in the 'Consultation statement - Annex A: Report on the regulation 18 consultation June 2017' on the Plan, Highways England is committed to assisting Wiltshire Council with the production of a Transport Evidence Base. This may include the use of a number of Highways England transport models. These include a new VISSIM model of A36 between College Roundabout and Petersfinger, which, could be used to test the impact of the Netherhampton sites on A36 College roundabout and the already congested section to the east of that junction. Our current work on the A36 has two objectives, to understand what improvement options there are to help improve its current performance and operation, and to understand the impact of growth and how this might be safely accommodated.

Highways England will continue to work with Wiltshire Council to determine whether the impact of any of these sites is likely to have a material impact.

Specific Questions

The online consultation questionnaire asks specific questions about the Plan and set out below are Highways England's responses to these specific questions.

	<p>Do you consider the Plan is Legally Compliant? This is not a matter on which Highways England has a remit to comment on.</p> <p>Do you consider the Plan is sound? This is a matter for the inspector to determine. Highways England will, of course, be willing to attend any examination to assist the inspector in understanding the implications of the plan.</p> <p>The soundness of Plans is assessed against the requirements set out in NPPF (Paragraph 182) which are that they should be Positively Prepared, Justified, Effective, and Consistent with National Policy. At this stage</p> <p>The work to assess infrastructure requirements for the Strategic Road Network is currently ongoing. This is being led by Wiltshire Council in consultation with Highways England. It is envisaged that infrastructure requirements will have been assessed by the time of the examination and Highways England will be willing to assist the inspector at that time to report on any residual implications for the Strategic Road network as may arise due to the Plan.</p> <p>What modifications are necessary? The need for any modifications to the plan will not be established until the transport evidence base has been completed.</p> <p>I hope you find the above useful. While Highways England are in regular discussions with Wiltshire Council regarding the plan and the evidence base to support it, if there are any queries or matters raised above which would warrant additional discussion then please contact me on the telephone number at the head of this letter.</p>
Attached files (Please see Objective)	4730129
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2393	Consultee Rachel Sandy Asset Manager South West	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Highways Agency Person ID: 903251		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Salisbury Sites – impact on A36 There are 740 dwellings proposed on Netherhampton Road. Of these, 640 are identified for land at H3.1 Netherhampton Road, Salisbury' and 100 on land 'H3.3 North of Netherhampton Road'. Policy H3.1 requires "Transport network improvements necessary to accommodate the scale of development envisaged". There is no equivalent Policy quoted for site H3.3. and it is the view of Highways England that both should be subject to the same requirement.</p> <p>There are other sites in villages to the north and south of the A36 as it passes through Wiltshire. Though these sites are mostly small in nature, the cumulative impact would add to the traffic to the A36 and this impact on the operational performance is not known. For example, there are 200 dwellings proposed in the Warminster area. This will need consideration in development of the evidence base.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2394	Consultee Rachel Sandy Asset Manager South West Highways Agency Person ID: 903251	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.11				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Chippenham sites - impact on M4 junction 17 The Plan introduces three other allocations in the vicinity of M4 junction 17 which were not included in the Chippenham Site Allocations Plan. These are at Hullavington (50 dwellings), Yatton Keynell (30 dwellings), and Crudwell (50 dwellings). There is no transport evidence to show that these sites would or would not impact on the SRN.</p> <p>Transport Evidence Base Wiltshire Council is currently in the process of developing the transport evidence base to support the development set out in the DPD. However, until that work is complete, Highways England is unable to confirm the scale or cost of the necessary highway interventions, or whether all parts of the Strategic Road network likely to be impacted by the development included in the Plan have been identified.</p> <p>As recorded in the 'Consultation statement - Annex A: Report on the regulation 18 consultation June 2017' on the Plan, Highways England is committed to assisting Wiltshire Council with the production of a Transport Evidence Base. This may include the use of a number of Highways England transport models. These include a new VISSIM model of A36 between College Roundabout and Petersfinger, which, could be used to test the impact of the Netherhampton sites on A36 College roundabout and the already congested section to the east of that junction. Our current work on the A36 has two objectives, to understand what improvement options there are to help improve its current performance and operation, and to understand the impact of growth and how this might be safely accommodated.</p> <p>Highways England will continue to work with Wiltshire Council to determine whether the impact of any of these sites is likely to have a material impact.</p> <p>The work to assess infrastructure requirements for the Strategic Road Network is currently ongoing. This is being led by Wiltshire Council in consultation with Highways England. It is envisaged that infrastructure requirements will have been assessed by the time of the examination and Highways England will be willing to assist the inspector at that time to report on any residual implications for the Strategic Road network as may arise due to the Plan.</p> <p>What modifications are necessary? The need for any modifications to the plan will not be established until the transport evidence base has been completed.</p>				
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Comment ID:	2395	Consultee Rachel Sandy Asset Manager South West Highways Agency Person ID: 903251	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.13				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Chippenham sites - impact on M4 junction 17</p> <p>The Plan introduces three other allocations in the vicinity of M4 junction 17 which were not included in the Chippenham Site Allocations Plan. These are at Hullavington (50 dwellings), Yatton Keynell (30 dwellings), and Crudwell (50 dwellings). There is no transport evidence to show that these sites would or would not impact on the SRN.</p> <p>Transport Evidence Base</p> <p>Wiltshire Council is currently in the process of developing the transport evidence base to support the development set out in the DPD. However, until that work is complete, Highways England is unable to confirm the scale or cost of the necessary highway interventions, or whether all parts of the Strategic Road network likely to be impacted by the development included in the Plan have been identified.</p> <p>As recorded in the 'Consultation statement - Annex A: Report on the regulation 18 consultation June 2017' on the Plan, Highways England is committed to assisting Wiltshire Council with the production of a Transport Evidence Base. This may include the use of a number of Highways England transport models. These include a new VISSIM model of A36 between College Roundabout and Petersfinger, which, could be used to test the impact of the Netherhampton sites on A36 College roundabout and the already congested section to the east of that junction. Our current work on the A36 has two objectives, to understand what improvement options there are to help improve its current performance and operation, and to understand the impact of growth and how this might be safely accommodated.</p> <p>Highways England will continue to work with Wiltshire Council to determine whether the impact of any of these sites is likely to have a material impact.</p> <p>The work to assess infrastructure requirements for the Strategic Road Network is currently ongoing. This is being led by Wiltshire Council in consultation with Highways England. It is envisaged that infrastructure requirements will have been assessed by the time of the examination and Highways England will be willing to assist the inspector at that time to report on any residual implications for the Strategic Road network as may arise due to the Plan.</p> <p>What modifications are necessary?</p> <p>The need for any modifications to the plan will not be established until the transport evidence base has been completed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2396	Consultee Rachel Sandy Asset Manager South West Highways Agency Person ID: 903251	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.7, H2.8, H2.9, H2.10				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Salisbury Sites – impact on A36 There are 740 dwellings proposed on Netherhampton Road. Of these, 640 are identified for land at H3.1 Netherhampton Road, Salisbury' and 100 on land 'H3.3 North of Netherhampton Road'. Policy H3.1 requires "Transport network improvements necessary to accommodate the scale of development envisaged". There is no equivalent Policy quoted for site H3.3. and it is the view of Highways England that both should be subject to the same requirement.</p> <p>There are other sites in villages to the north and south of the A36 as it passes through Wiltshire. Though these sites are mostly small in nature, the cumulative impact would add to the traffic to the A36 and this impact on the operational performance is not known. For example, there are 200 dwellings proposed in the Warminster area. This will need consideration in development of the evidence base.</p> <p>Transport Evidence Base Wiltshire Council is currently in the process of developing the transport evidence base to support the development set out in the DPD. However, until that work is complete, Highways England is unable to confirm the scale or cost of the necessary highway interventions, or whether all parts of the Strategic Road network likely to be impacted by the development included in the Plan have been identified.</p> <p>As recorded in the 'Consultation statement - Annex A: Report on the regulation 18 consultation June 2017' on the Plan, Highways England is committed to assisting Wiltshire Council with the production of a Transport Evidence Base. This may include the use of a number of Highways England transport models. These include a new VISSIM model of A36 between College Roundabout and Petersfinger, which, could be used to test the impact of the Netherhampton sites on A36 College roundabout and the already congested section to the east of that junction. Our current work on the A36 has two objectives, to understand what improvement options there are to help improve its current performance and operation, and to understand the impact of growth and how this might be safely accommodated.</p> <p>Highways England will continue to work with Wiltshire Council to determine whether the impact of any of these sites is likely to have a material impact.</p> <p>The work to assess infrastructure requirements for the Strategic Road Network is currently ongoing. This is being led by Wiltshire Council in consultation with Highways England. It is envisaged that infrastructure requirements will have been assessed by the time of the examination and Highways England will be willing to assist the inspector at that time to report on any residual implications for the Strategic Road network as may arise due to the Plan.</p> <p>What modifications are necessary? The need for any modifications to the plan will not be established until the transport evidence base has been completed.</p>				
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**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	2397	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol) Person ID: 1132626	Agent Mr Daniel Weaver Pegasus Group Person ID: 1126961	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.				Positively prepared Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Timetable</p> <p>The current programme as set out in the Wiltshire's Local Development Scheme is for the HSAP to reach adoption by 2018. This will depend on the response to this consultation and the changes the Council feel necessary to issues raised. Noting that consultation on 'Issues and Options' stage to this 'waypoint' in the Plan-making process, has largely been 'informal' consultation of local bodies and other groups and not wider consultation. Therefore, while this is a pre-submission consultation it is the first time that wider consultation has been carried with the general public and other stakeholders and it must be expected that a large weight of submissions should be expected.</p> <p>Historically significant delays have occurred during this stage of the plan making process. The Wiltshire Core Strategy (WCS) originally published a pre-submission draft in February 2012 but was not adopted until January 2015. The Chippenham Site Allocations Plan pre-submission draft was originally published in February 2015 and was adopted in May 2017. These two key documents in the suite that make up the existing local plan saw significant delays in their adoption post pre-submission publication.</p> <p>Furthermore, these plans have been adopted with a commitment to produce further documents to cover identified gaps in the policies across Wiltshire. In this respect the WCS has an immediate 'partial' review now programmed into the LDS which is further delayed. The WCS Inspector was very clear that the plan could be found sound only if the 42,000 was seen as a minimum and that the figures identified in the various community areas were seen as indicative. This conclusion was also informed by the fact the Council had told him that a new SHMA would be published by early 2016 and that the WCS would be subject an early review.</p> <p>This would appear to be related to a new Housing & Economic Development Needs Assessment (HEDNA) for Wiltshire and Swindon being jointly prepared by the two authorities. It is our understanding that the HEDNA, although it has been with the Council for some time, has still not been published. It is further understood that the scope of the partial review will be extended to take account of the results of the HEDNA which will update the housing and economic requirements as is necessary whilst extending the WCS plan period to 2036. It is fair to conclude that the Council have also made no material progress towards adopting a Core Strategy review and this has specific implications in term Objectively Assessed Needs.</p> <p>The HSAP itself has also seen significant delays since originally being programmed in the Local Development Scheme. As part of the examination of the WCS in 2014 the LDS showed the HSAP being adopted in in 2015. Each subsequent Local Development Scheme has significantly revised this timetable with the current one published in December 2016. Therefore, with regard to a number of serious concerns outlined in this, and no doubt many other consultation responses, alongside a history of delayed delivery, the current document and the treatment of housing allocations at Trowbridge within it, is considered likely to exacerbate these historic failings.</p> <p>A positive approach is necessary within the HSAP to accord with the NPPF, but also to limit the length of the examination, and to enable sustainable development to occur in a timely fashion. It is therefore suggested, that significant amendments are required to the current draft HSAP prior to this being submitted to the Secretary of State in order to address some of the fundamental failings of the current draft, including additional allocations in the Trowbridge area.</p>			

Attached files (Please see Objective)	4729773
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2398	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Failure to Address Strategic Needs of Trowbridge and Wiltshire</p> <p>As noted above, the 42,000 described in the WCS was seen as a minimum and in fact the Inspector concluded that OAN was in fact 44,000. The HSAP makes it clear that the 42,000 is likely to be delivered without full allocation at Trowbridge. In fact, the HSAP notes at paragraph 4.2 that: “The figures above show a minimum to be allocated, but a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.”</p> <p>The HSAP sets out that of the indicative requirements for the Trowbridge Community Area (6,810 homes in Trowbridge and 165 homes in Trowbridge remainder), there are still approximately 3,755 homes to be delivered. The HSAP states that: “the residual housing requirement to be planned for at the town over the period to 2026 is significant.”</p> <p>The reasons for this significant housing shortfall include the extensive delays to secure planning permission on the Strategic Allocation of Ashton Park.</p> <p>This pattern is mirrored across the strategic settlements of Wiltshire where each of the three principal settlements have not delivered housing numbers as envisaged in the plan. Chippenham Community Area has delivered only 1,613 out of allocation of 5,090 and Salisbury Community Area has delivered 2,711 of an allocation of 6,315.</p> <p>The recurring key issue for all of these settlements has been reliance on large sites and significant urban extensions which have failed to deliver homes in the short term and with little under 8 years left in the plan period, it is clear that many of these sites will run over into the next period. Furthermore, this has led to development pressure elsewhere within the plan area where a number of towns have seen ‘planning by appeal’ and these will now deliver in excess of the indicative requirements as set out in the WCS.</p> <p>The NPPF does promote large strategic allocations as positive way to plan for infrastructure needs but stresses that a mix of housing sites will be needed to enable a timely delivery of housing needs in any area. To date the reliance on large sites (without the necessary smaller sites) has resulted in delays to delivery which has undermined the spatial distribution of the WCS.</p> <p>This has been exacerbated by the removal of the Chippenham sites from the WCS.</p> <p>This will be further compounded by the failure of current proposed allocations in the HSAP at Trowbridge to meet the full allocation. As proposed there would be a residual shortfall of 1,220 homes still required to meet the needs of Trowbridge Town and a shortfall of 750 homes to meet the needs of Trowbridge Community Area. As a key strategic settlement and the primary focus of development within the WCS it is not clear how under delivery at Trowbridge can meet the spatial strategy and development requirements of Wiltshire.</p> <p>In any case taking the OAN and the fact the figure in the WCS is a minimum figure, there is plainly no difficulty in the HSAP document allocating sites for housing in excess of 42,000. Indeed, properly read, a figure above 42,000 would be entirely consistent with both the working and the evidence surrounding the WCS.</p>				

	<p>There is a clear pattern of under delivery at the strategic settlements of Wiltshire and the HSAP fails to acknowledge this issue or examine it in any meaningful way. There is limited commentary within the plan on the decision to not allocate the full amount at Trowbridge and the ramifications of this decision are not examined in the Sustainability Assessment (SA).</p> <p>The non-allocation of homes at a principal settlement is a crucial strategic decision and the lack of analysis or commentary of this issue is a glaring omission on the current evidence base. Given the acknowledged need within the HSAP to provide a surplus, alongside the shortfall in the OAN, there is clear and obvious requirement to allocate a full amount at Trowbridge.</p>
Attached files (Please see Objective)	4729773
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2399	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Hilperton and Trowbridge There has been no assessment of Maxcroft Farm in the HSAP. This is thought to be because it is perceived as relating to Hilperton and not Trowbridge.</p> <p>The WCS emphasises the separate identity of Hilperton, and this is in part preserved by the important green space of Hilperton Gap. However, it should be recognised that Trowbridge, Hilperton, and Staverton Marina effectively constitute a continuous urban area. The existing extensive development along Canal Road, at Staverton Marina and Hilperton Marsh to the west of the main historic core of the village, as well as the housing at Paxcroft Mead to the east, demonstrate the functional and physical relationship the village has with Trowbridge.</p> <p>There is no visual spatial definition of Trowbridge or the remainder for the purposes of identifying additional allocations. The only definition comes in paragraphs 5.35 and 5.150 of the WCS which both identify that the figures for Trowbridge relate to the continuous urban area. Core Policy 29 is followed by Table 5.17 which sets out the respective housing requirements for Trowbridge and the remainder. This has a footnote which identifies that within the 6,810 housing requirement for Trowbridge urban area: “Housing numbers for Trowbridge include those planned for the village of Hilperton.”</p> <p>There are a number of settlements in close proximity, including Hilperton which is immediately adjacent and Staverton which is the other side of the canal from Trowbridge. Paragraph 5.35 nevertheless identifies that as Trowbridge is defined as its continuous urban area this includes Staverton. It identifies Staverton in particular as this lies in Bradford on Avon Community Area. It makes no comment on Hilperton (within Trowbridge CA) as this is not relevant to Bradford on Avon CA. However, by the same principle it would be expected that Hilperton would be included in the Trowbridge continuous urban area as it is far more closely physically related to Trowbridge than Staverton.</p> <p>The Core Strategy is therefore unclear on the status of Hilperton, as it identifies it as a separate settlement in Core Policy 29; and requires that its distinct identity is protected in paragraph 5.150; but includes it as part of Trowbridge in footnote 56; defines Trowbridge Town as the continuous urban area of Trowbridge (which must by any rational definition include Hilperton); and explicitly includes a less well-connected settlement within the continuous urban area of Trowbridge. Notwithstanding this lack of clarity, the only explicit definition (in footnote 56) indicates that Hilperton forms part of Trowbridge and by any rational and consistent approach to Hilperton it must form part of the continuous urban area of Trowbridge.</p> <p>Therefore, in order to meet the indicative housing requirement for Trowbridge Town, there is a need to allocate sites at Trowbridge including Hilperton. However, even if contrary to footnote 56, Hilperton is excluded from Trowbridge Town, allocations are still required including those at Hilperton to meet the Community Area requirements.</p> <p>Regardless of the conclusion on this matter, paragraph 4.34 states: “Despite the Housing Market Areas being the appropriate scale for assessing land supply, the town and Community Area requirements should also be capable of being a material consideration to ensure that delivery is distributed broadly in line with the strategy. So for example, whilst it is appropriate for supply in Trowbridge to provide for some of the requirement of Westbury, it would be wholly inappropriate for the entirety of</p>				

	<p>Westbury's requirement to be added to Trowbridge. The policy framework sets out the strategic pattern of growth, while allowing some flexibility to respond to future, spatially distinctive opportunities and constraints.”</p> <p>This clearly indicates that providing the broad spatial distribution is maintained, as would be the case through development at Hilperton to meet Trowbridge's needs (regardless of whether or not Hilperton is included as part of Trowbridge), then this is appropriate. Therefore, even if the site is not included in the Trowbridge urban area, given lack of alternatives at Trowbridge development at Hilperton will be required to maintain the spatial distribution.</p> <p>Furthermore, the 2011 Census data shows that Hilperton had a population of 4,967, with the main part of the historic village located to the east of the site on Marsh Road. Facilities at Hilperton itself are not of a level that might be expected for a village with a population close to 5,000. It has a retail store located at the petrol station on Wyke Road, which includes the Hilperton Marsh sub-post office, with the Kings Arms pub opposite. Beyond these, the village has a primary school and village hall located toward the historic core.</p> <p>The spatial strategy that supported the WCS stated that settlements that had a functional relationship should be planned jointly. To this extent while physically separated Melksham and Bowerhill are considered a single settlement; and the needs of Salisbury and Wilton are assessed jointly. It is clear that Hilperton is largely dependent on Trowbridge for both employment and other facilities such as supermarkets and other convenience stores, doctor's surgeries and pharmacists, and secondary schools and that it is more closely related to Trowbridge than either Bowerhill is to Melksham or Wilton is to Salisbury. The housing and population of Hilperton are clearly part of the continuous urban area of Trowbridge, contributing to critical mass that has seen Trowbridge develop as strategic centre for Wiltshire. Therefore, the area acts effectively as one urban area and is functionally and physically connected. Indeed, the proximity of Hilperton to Trowbridge means that the residents of the village have better access to facilities than those in any other Large Village in Wiltshire, or than many suburban residents in larger settlements outside of Wiltshire.</p> <p>It is clear that development of Maxcroft Farm must be seen in the context of delivering housing for the needs of Trowbridge and Hilperton. Therefore, the lack of assessment of Maxcroft Farm, which is examined in more detail in terms of the methodology in section 5, and the lack of commentary on the decision not to allocate for the full housing needs at Trowbridge means that the HSAP will not meet the needs of Wiltshire nor deliver a sound and objectively assessed plan.</p>
Attached files (Please see Objective)	4729773
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2400	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol) Person ID: 1132626	Agent Mr Daniel Weaver Pegasus Group Person ID: 1126961	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared Justified Effective Consistent with national policy		No
Please identify the policy, paragraph, table, figure or site to which you are referring.		Ommision site Maxcroft Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		<p>MAXCROFT FARM</p> <p>We have presented the credentials of the Maxcroft Farm in a Technical Delivery Document that accompanies these representations. This considers:</p> <ul style="list-style-type: none"> • the sustainability of the location; • the environmental factors affecting the location; • the realistic housing potential/capacity of the area in relation to the environmental effects of development; • the deliverability of the location. <p>This is also supported by detailed technical notes supporting this representation in order to address identified concerns from internal consultees at Wiltshire</p> <p>It is not the intention of this response to repeat the content of these documents. However, a brief assessment of the sites credentials in terms of sustainable development is presented in the following table. This focuses on the sustainability of the site itself rather this it role in the wider deliver of housing for Wiltshire which is the subject of this response.</p>			

Strategic Priorities of the JSP

Economic:	<p>The benefits of the proposed development would support the economic role of the NPPF through the purchase of materials and services in connection with the construction of the dwellings, an increase in local household expenditure as well as revenues to the Council from the New Homes Bonus.</p> <p>Significant positive weight should be attached to the direct economic benefits associated with the construction of new homes within Maxcroft Farm and <i>significant</i> positive weight should be attached to the role that additional housing will play in supporting the existing services and facilities within the settlement.</p>
Social:	<p>Substantial weight is to be given to the provision of housing per se, particularly the provision of additional family and affordable housing that would boost housing supply, enhance the diversity of the local population and provide support to existing community and social facilities.</p> <p>The development will provide a mix of housing types and sizes meeting the needs of the local population. In accordance with Core Strategy policy the development will provide 30% on-site affordable housing with no public subsidy. The affordable housing will be secured through a Section 106 Agreement. This would constitute a significant benefit in terms of paragraph 14 of the Framework.</p> <p>The proposed development will also include a new community building, which will be of significant benefit to local people in providing a facility for use by local groups, people and other active organisations in the area.</p>
Environment:	<p>The proposed development will have a neutral impact on the landscape character and heritage setting as any minor adverse impact – an inevitability of the residential</p>

development on greenfield land will be mitigated by the proposed landscape measures.

A significant area of public open space is proposed across the development which will include formal and informal open space and provision for children and young people, which will be of substantial benefit to both new and existing residents.

A full Ecological Survey of the site will describe the habitats to be enhanced and introduced as part of the proposed development, which will benefit local biodiversity.

There is no suggestion that the proposed development would be unsustainable in respect of natural resources including ground, water and air.

The design of the proposed dwellings will be further discussed and refined prior to any application, but this will include measures to reduce overall energy and carbon dioxide emissions by reducing energy consumption through design, orientation, lighting, heating requirements and air tightness, including low energy appliances and heating systems.

Positive weighting should be attached in the planning balance to the environmental dimension of sustainable development.

It is considered that the proposals reflect all three dimensions and thus represent sustainable development. As explained below the proposals will secure significant benefits which must be weighed in the planning balance.

It is considered that the proposals reflect all three dimensions and thus represent sustainable development. As explained below the proposals will secure significant benefits which must be weighed in the planning balance. In terms

of delivery Barratt Homes are keen to stress that the delivery of this site is immediate, and could be delivered from start on site (following allocation/consent) to practical completion with 24 months.

The table below sets out the programme for the delivery of up to 160 units at land Maxcroft Farm.

Programme	Timeframe/Numbers
Allocation in Wiltshire Housing Sites DPD/Hilperton Neighbourhood Plan	Winter 2018 (Based on Wiltshire Council Timetable)
Grant of Outline Planning Permission subject to S.106 Agreement	March 2019
Agreement of S.106 and issue of Outline Planning Permission	April 2019

Submission of Reserved Matters	June 2019
Approval of Reserved Matters	September 2019
Discharge of Conditions	November 2019
Commencement on site	March 2020
Housing Completions	
<ul style="list-style-type: none"> • 1st Unit • 50 Unit • 100 Units • 150 Units 	Sept 2020 July 2021 September 2022 March 2023

	Given the issues with delivery in Wiltshire and the strategic settlements this must be considered a significant benefit of the site to realistically deliver well within the remaining plan period before 2026. As set out in the next section it is not thought that the allocations as they stand will achieve this aim.
Attached files (Please see Objective)	4729773 / 4729774
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2401	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The HSAP is inconsistent in its identification and treatment of locations across Trowbridge. As stated above, no assessment of Maxcroft Farm has been undertaken yet other sites around Trowbridge which manifestly are likely to have detrimental impacts on key issues identified for the town have been taken forward regardless. While there is currently no evidence that at least small parcels of these sites could be delivered, given the extensive delays caused by ecological issues at Ashton Park further allocations to the south and south east (incorrectly noted as south west in the HSAP) of Trowbridge would appear likely to suffer similar delivery issues making any reasonable prospect of delivering within the plan period highly unlikely.</p> <p>The methodology supporting the allocations of the HSAP is set out in a separate topic paper. This involved a five-stage process. We are satisfied by the basic model and the rigour of stages 3 to 5, if not the conclusions of these latter stages. As with the key decision around the lack of allocation of homes at Trowbridge, the Council has failed to provide sufficient clarity as to the area of search and exclusionary criteria used to identify potential sites for Trowbridge. The rationale for not including Maxcroft Farm is neither apparent in the outlined methodology nor any commentary in the document or the accompanying SA</p> <p>The first basic point is that the HSAP needs to clarify the area of search used for Trowbridge. The methodology states that sites connected physically to a defined settlement have been taken forward, yet sites to the east of Ashton Park have been taken forward from the stage 2 to stage 3 assessment, which are only notionally connected to town with sensitive ecological areas in between. The opportunity to for these sites to form part of the existing built up area is severely limited, a crucial part of the exclusionary criteria set out in stage 2.</p>				
Attached files (Please see Objective)	4729773				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2402	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Maxcroft is physically connected to the Trowbridge and Hilperton continuous urban area, adjacent to both the Trowbridge and the Hilperton settlement boundary. Therefore, why a site that is physically connected to the continuous Trowbridge urban area is not even considered in the area of search is not clear. Given the limited options and lack of full allocation at Trowbridge, the HSAP should establish an appropriate area of search for as an important location as Trowbridge in the settlement hierarchy, in line with the policies of the WCS highlighted in section 3.				
Attached files (Please see Objective)	4729773				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2403	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5.5 As noted above [see attached], while at this stage the credentials and deliverability of many of the sites is yet to be fully established. It is clear that further allocations to the south and east of the town will be compromised by the delivery of Ashton Park and vice-versa. In the table [see following reps] below we highlight the sustainability and deliverability issues of some of the proposed allocations as highlighted in the Councils own SA.				
Attached files (Please see Objective)	4729773				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2404	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		It is concerning to note that SA repeats the earlier reference to the site being to the south west of Trowbridge.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2405	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Site includes recorded presence of Bechstein's Bats associated with the Bradford-on-Avon Bats SAC, it is within easy walking distance of Biss/Green Lane Wood a core roosting area. Despite this the ecological effects are considered moderate.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2406	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		There is no up-to-date assessment of the grade of agricultural land at this site and therefore it is difficult to know whether it accords with national policy.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2407	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		It is noted that there is a shortfall in capacity of local primary schools and the location of the railway line means the pupils will not be able to access the planned school development at Ashton Park.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2408	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		It is noted that cycling and other sustainable access to the town centre would need to be improved. Given the distance of the site from the centre of Trowbridge it is clear that car dependence will increase from the site given the lack of alternative options.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2409	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Site includes recorded presence of Bechstein's Bats associated with the Bradford-on-Avon Bats SAC, it is within easy walking distance of Biss/Green Lane Wood a core roosting area. Despite this the ecological effects are considered moderate.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2410	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		There is no up-to-date assessment of the grade of agricultural land at this site and therefore it is difficult to know whether it accords with national policy.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2411	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		It is noted that there is a shortfall in capacity of local primary schools and the location of the railway line means the pupils will not be able to access the planned school development at Ashton Park.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2412	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		It is noted that cycling and other sustainable access to the town centre would need to be improved. Given the distance of the site from the centre of Trowbridge it is clear that car dependence will increase from the site given the lack of alternative options.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2413	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		It should also be highlighted that the site sits within the gap between Trowbridge and North Bradley. While North Bradley does sit in close proximity to Trowbridge it does not form part of continuous urban area therefore development of this site will erode the individual identity of North Bradley.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2414	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Site includes a number of nearby listed structures and extensive records of archaeological remains and notes that mitigation will difficult to achieve.			
Attached files (Please see Objective)		4729773			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2415	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is clear that further allocations to the south and east of the town still have numerous ecological issues to overcome and would appear to be directly contradicting the key issues highlighted in paragraph 5.150 of the WCS. The sensitivities around the south east of the town mean that delivery of these sites is likely to be delayed and it is likely that there will be a significant under delivery at Trowbridge unless further deliverable sites are identified.</p> <p>The HSAP further states that there are significant ecological, landscape and infrastructure constraints with the following issues needing to be addressed by housing and yet the HSAP allocates to areas directly affecting the key sites and species connect to the Bradford-on-Avon SAC. The rationale to discount Maxcroft Farm will simply leave delivery of housing to later plan periods.</p>				
Attached files (Please see Objective)	4729773				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2416	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Mr Daniel Weaver Pegasus Group	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Person ID: 1126961	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is a failure to properly address the housing and development needs of Trowbridge and to recognise the role that sites adjacent to the continuous urban area of Trowbridge (including at Hilperton) can play in delivering housing at this key strategic location and principal settlement in Wiltshire. In this context, the site allocations for Trowbridge present a clear failing in this draft HSAP that will need to be rectified, in order that this document delivers an effective land supply of housing in Wiltshire. A separate Written Opinion is attached at Appendix 1 from No5 Chambers on the relationship between Hilperton and Trowbridge and the legal conformity to the Site Allocation Plan in its current form.				
Attached files (Please see Objective)	4729773				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2417	Consultee Mr G Tunbridge	Agent Mr Dan Washington Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132861	BBA Architects and Planners Person ID: 1132859	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	A.29 corsham Settlement Boundary	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land at 6 Halfway Firs, Bath Road, Corsham</p> <p>I write on behalf of our clients, Mr and Mrs Arnall, to set out representations to the pre-submission Wiltshire Housing Site Allocations Plan in relation to their house and surrounding curtilage at 6 Halfway Firs, Corsham. This representation relates specifically to the proposed revised settlement boundary for Corsham.</p> <p>In undertaking the task of revising the settlement boundaries of the towns in Wiltshire, the Council has recognised that the existing settlement boundaries are out of date and do not reflect changes which have taken place since they were first established. The Council has recognised that houses along the southern side of Bath Road, together with the former MOD Copenacre site to the north, form part of the settlement of Corsham and should be included in the settlement boundary. This is supported. However, it appears that the Council's proposed revised settlement boundary continues to be based on outdated, or inaccurate OS plans as only part of the curtilage of 6 Halfway Firs is included within the boundary. The boundary as drawn does not reflect the actual curtilage of the dwelling, or any physical boundary on the ground (please see attached extract of the aerial photo).</p> <p>It is submitted that the settlement boundary for Corsham should be revised as detailed in the attached plan, which reflects the actual curtilage of 6 Halfway Firs, and provides a clear and logical boundary to the settlement, with fields in active agricultural use beyond. The area is already clearly in residential use, surrounded on three sides by built development and would not extend the built form of Corsham.</p> <p>The sites inclusion as proposed would be consistent with the settlement boundary review methodology as set out the relevant Topic Paper (Topic Paper 1) and would be consistent with the inclusion of other sites on the edge of Corsham, particularly the land to the east of the site at Halfway Farm.</p>				
Attached files (Please see Objective)	4729867 / 4729868 / 4729870				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2418	Consultee Mr and Mrs Arnall	Agent Mr Dan Washington Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132941	BBA Architects and Planners Person ID: 1132859	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.29 corsham Settlement Boundary		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write on behalf of our clients, Mr and Mrs Arnall, to set out representations to the pre-submission Wiltshire Housing Site Allocations Plan in relation to their house and surrounding curtilage at 6 Halfway Firs, Corsham. This representation relates specifically to the proposed revised settlement boundary for Corsham.</p> <p>In undertaking the task of revising the settlement boundaries of the towns in Wiltshire, the Council has recognised that the existing settlement boundaries are out of date and do not reflect changes which have taken place since they were first established. The Council has recognised that houses along the southern side of Bath Road, together with the former MOD Copenacre site to the north, form part of the settlement of Corsham and should be included in the settlement boundary.</p> <p>This is supported. However, it appears that the Council's proposed revised settlement boundary continues to be based on outdated, or inaccurate OS plans as only part of the curtilage of 6 Halfway Firs is included within the boundary. The boundary as drawn does not reflect the actual curtilage of the dwelling, or any physical boundary on the ground (please see attached extract of the aerial photo).</p> <p>It is submitted that the settlement boundary for Corsham should be revised as detailed in the attached plan, which reflects the actual curtilage of 6 Halfway Firs, and provides a clear and logical boundary to the settlement, with fields in active agricultural use beyond. The area is already clearly in residential use, surrounded on three sides by built development and would not extend the built form of Corsham.</p> <p>The sites inclusion as proposed would be consistent with the settlement boundary review methodology as set out the relevant Topic Paper (Topic Paper 1) and would be consistent with the inclusion of other sites on the edge of Corsham, particularly the land to the east of the site at Halfway Farm.</p>				
Attached files (Please see Objective)	4729933 / 4729934 / 4729935				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2419	Consultee Mr Richard Daone Team Leader - Planning Policy Bath & North East Somerset Council	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 558939		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Whole Plan			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I write in response to your email of 28th July and in response to consultation on the draft Wiltshire Housing Site Allocations Plan. It is noted that the Draft Plan has been prepared in accordance with the Wiltshire Core Strategy, on which there was significant and active engagement with B&NES Council and overall agreement on the strategy proposed. There is broad alignment between the two authorities respective Core Strategies. Further to a meeting with Wiltshire Council (Georgina Clampitt-Dix, Head of Spatial Planning and Carolyn Gibson, Spatial Plans Team Leader) I am writing to confirm that B&NES Council officers have considered the Draft Housing Site Allocations Plan and do not wish to make any comments on it. Whilst no concerns are raised in relation to the Draft Plan B&NES Council would welcome sight of any representations received by Wiltshire Council in relation to sites close to the boundary with B&NES. This is useful in remaining apprised of the issues being raised which may also be germane to preparation of a New Local Plan for B&NES which will cover the period to 2036.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2420	Consultee Mrs Mary Keates	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126826		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Ref - H2.3 Elizabeth Way After several attempts to use the website/email to comment on the proposed development in the "Hilperton Gap" I have resorted to last minute comments (by post) which will be hand-delivered to the council offices TODAY to ensure it is received in time. I have sent a copy to the county councillor in the area.</p> <p>I oppose the development H2.3 Elizabeth Way for several reasons:</p> <p>The need to keep a buffer between Hilperton and Trowbridge.</p> <ul style="list-style-type: none"> - This will ensure that the village keeps its identity. - Eroding the gap will make Hilperton a part of Trowbridge. <p>The Trowbridge Boundary has always been seen as Wyke Road, Victoria Road and Albert Road and Hilperton Marsh is part of Hilperton Parish which isn't even in the same electoral constituency as Trowbridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2421	Consultee Mrs Mary Keates Person ID: 1126826	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The need for Recreation Space. - There are no facilities in this area, unlike some where there are country parks, etc. - Walkers are able to take advantaged of a pleasant space without obstructions and are able to see flora and fauna in a natural environment and appreciate views. - Children need recreation space where they can have fun and use their imagination, as well as appreciate nature. Traditionally for many years this space has been used by the children of Newleaze, Horse Road, Wyke Road, Victoria Road and the village. They are able to play games, toboggan in the winter, build dens and have the freedom to just have fun. My brothers and I, my children and my grandchildren have all used the gap to play in as children, as have many other residents. - there will be no facilities for the residents of the proposed development. - Children's playgrounds are a long walk for little ones and not always safe. Loss of Aesthetic opportunities - From Trowbridge/Hilperton Road there are terrific views across towards Staverton etc. which would be lost. People using the new road comment on the view. - Landscape which could grace any painting - Trees and fields - Fresh Smells, fresh air				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2422	Consultee Mrs Mary Keates	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126826		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There are many other "brown field" sites in the Trowbridge area.</p> <ul style="list-style-type: none"> - These should be used before making residents lose the little " countryside" there is in the area now - The eyesores, such as the old Bowyers site, could become attractive housing giving more vibrancy to the centre of town and making the town more attractive to visitors. Arriving in Trowbridge by train from Bath gives a very poor perspective of the town. - all of the proposed snatching of green fields could be avoided by using the sites in the Trowbridge area. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2423	Consultee Mrs Mary Keates	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126826		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are foxes, badgers, bats, rabbits, birds, reptiles and many more creatures in the area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2424	Consultee Mrs Mary Keates	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126826		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Lack of facilities - There are no secondary schools, medical facilities, cinemas, theatres etc in vicinity of the proposed development - Few shops, restaurants or pubs within walking distance				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2425	Consultee Mrs Mary Keates	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126826	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Transport</p> <ul style="list-style-type: none"> - Poor bus services - The bus service is very poor, particularly in the evening/at night - it is too far to walk to the railway station - increased traffic on already congested roads - Limited and expensive parking in the town <p>These are just some of the reasons why I object to the proposed development. I have been a resident of the Trowbridge area for all if my life and my family have for generations. There has to be more housing, more facilities , better infrastructure but please think about what will be lost before using up the few natural resources that we have left in the area and if there are alternatives, use them.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2426	Consultee Mr Richard Chadwick	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132711		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am against the building of any further housing along Tetbury Lane, at Ridgeway Farm. I believe that further development will increase the chance of surface water flooding into my property.</p> <p>I live at and my garden butts up to the field ditch which runs along the back of the gardens on the west side of the Dawneys. This ditch catches all the surface water from the fields up the slope towards Chedglow and whenever we have a period of heavy rain, the ditch fills up and water seeps into my garden and ends up laying against the back of my bungalow.</p> <p>Periods of heavy rain are more frequent now and the existing Surface Water drainage in Crudwell takes longer to get back to normal after one of these storms. Over the past few years fields along Tetbury lane have flooded, the Village Hall playing field has been saturated, as well as manhole covers blown at the junction with the Street.</p> <p>It was recorded in letters, submitted at the first Planning Application for housing at Ridgeway Farm, from people living in the Dawneys, about the problems of flooded gardens as a regular occurrence, from surface water coming over the ditch from the field at the back.</p> <p>Will you be carrying out a survey to determine more accurately the surface water loading which travels down these fields. Just transferring the surface water run- off, from these developments, into the existing struggling drainage system in the village, is not acceptable.</p> <p>More housing will only further disrupt the existing natural surface water drainage routes and the problems caused by the speed and volume of run off from roofs, drives, gardens and roads will increase the likelihood of flooding to my property.</p> <p>If you wish to visit my property I am quite happy to see you.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2427	Consultee Mr John Armitage	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132740		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I confirm I fully support the recent objection sent by Netherhampton Parish Council regarding the potential housing development on the Netherhampton Road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2428	Consultee Mr John Armitage	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132740	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I confirm I fully support the recent objection sent by Netherhampton Parish Council regarding the potential housing development on the Netherhampton Road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2429	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We live at . Along with our neighbours at St John’s Church and at least 5 other neighbouring properties our dwelling is grade 2 listed. According to the listing guidelines and development pertaining to such properties, any development has to fit certain criteria. This is not simply the structure of the listed building but location, context and surrounding. Any development that is obviously visible from the said listed buildings is detrimental to the buildings themselves which have been listed intrinsically with the location.</p> <p>Our address is 2 Church Lane. It is not Off the M4 next to Homebase. The setting is the lane, the church, and the extent thereof being the parish boundary. Any development affecting this setting is contrary to policy: local government, town and national planning.</p> <p>Section 66 of the Listed Buildings Act states that in planning the Council must pay particular regard to protecting the setting of listed buildings. Whilst we appreciate planning and development are necessary, it is fairly obvious that the council gets it wrong sometimes. As an example: whoever gave planning for the “lead bunkers” to be stuck on the side of St John’s Church in 1980 obviously was either mad or had no idea of what a Victorian gothic church was or is.</p> <p>So, in conclusion, to avoid incorrect planning decisions, any development in the fields (Site 1021) along Church Lane would be inappropriate from a town development point of view (the buffer zone between villages being taken up, the apparent attempt to change parish boundaries ie. Church Lane, the destruction of a setting that has been unchanged since the church and associated buildings were erected in the mid 19th century). There is no justification in planning law to ignore the legal standing of a listed building when it has been listed for very specific reasons.</p> <p>The above letter was written by my attached next-door neighbours at 2 Church Lane, Trowbridge. I agree with everything contained in it. Furthermore:</p> <p>Maintaining the Setting of Heritage Sites - Listed Buildings</p> <p>The sites at the back of Church Lane provide a rural setting for 7 Grade II Listed buildings as follows: -</p> <ul style="list-style-type: none"> - St Johns Church School and Hall masters dwellings comprising 4 dwellings. (UID1021593) - Church of St Johns (UID 1364192) - 344 Frome Road (UID 1364193) - Rose Villa (UID 1021594) . <p>See attachment for quotes from policy context and pictures.</p> <p>The photographs below clearly show that current development on this side of town has enabled these buildings to maintain their historic setting. Ancient landscape and monuments</p> <p>I have also been advised that the Church Lane Site 1021 may be crossed by ancient ley-lines.</p> <p>The site most certainly contains a well-documented ancient monument – the ancient water-meadow MW173579.</p> <p>Site 1021 is bordered by an ‘important’ historical hedge as defined by the Hedgrows Act 1997. Evidenced by OS 1890 map, and the OS Old Series 1791-1874 map.</p>				

	<p>I attended the public exhibition evening laid-on by Wiltshire Council on 26th July 2017 at County Hall in Trowbridge where I was given a copy of the glossy brochure explaining the Site Allocation and consultation process. On page 7 of the document is a flow diagram showing how potential sites are selected. Point 2a on the chart reads: 'SHLAA sites are rejected from further consideration or their capacity reduced where affected by obstacles to development such as heritage and wildlife designations and flood plain, or because the site is already a commitment for development or located in the built up area.' The Church Lane site 1021 should have been rejected on three different grounds: Heritage – as set out above; In summary, I would contend that the above Planning Practice Guidance will have been breached if modern housing development is implemented on Church Lane as it would cause clear detrimental deterioration to the immediate ancient rural landscape, the ancient monument being the water meadow, and to the setting of the 7 listed properties at this location, one of them being the 19th Century Church of St John the Evangelist. At least one of the Listed properties on Frome Road overlooking proposed development site 1021 dates back still further to at least the 18th Century.</p>
Attached files (Please see Objective)	4742916
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2430	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Church Lane site 1021 should have been rejected on three different grounds: Flooding – site 1021 is entirely on flood plain – a mixture of zones 1, 2 and 3. As stated above it is ancient water meadow – the clue is in the title.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2431	Consultee Mr Julian Bower	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 691512	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Pre-Submission Draft Plan – Community Area Topic Paper – Warminster In the above you have allocated a development of 35 new houses to Chapmanslade, this relating to the proposed development of part of Barter’s Nursery. I understand that the Chapmanslade Parish Council has objected. This is reversal of a continuing policy of approval whilst considering earlier versions of the same development. I am strongly in favour of the development and attended one of the supportive Parish Council meetings some while back.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2432	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Further – the same Wiltshire Council brochure at page 10 says under the heading ‘Why review settlement boundaries?’ ‘The Wiltshire Core Strategy uses settlement boundaries as a policy tool for managing how development takes place. In simple terms, a ‘settlement boundary’ is the dividing line, or boundary between areas of built/urban development (the settlement) and non-urban or rural development – the countryside. In general, development within the boundary is, in principle acceptable, whereas development outside the boundary with limited exceptions, not acceptable.’ Site 1021 Church Lane is outside the settlement boundary, both before and after the settlement boundary review exercise as shown on the map above paragraph 5.29 in the Wiltshire Housing Site Allocations Plan Pre-submission draft plan Community Area Topic Paper – Trowbridge. As already stated It is difficult to imagine what exceptional reasons exist for developing site 1021 which has unique rural and heritage aspects, very valuable biodiversity and ancient monument status, sits on a flood plain adjacent to the well-established Southwick Country Park – as well as being OUTSIDE the settlement boundary.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2433	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Church Lane site 1021 should have been rejected on three different grounds:</p> <p>Wildlife – This area of green buffer running alongside the Southwick Country Park is home to all manner of flora, fauna and wildlife, not least the now extremely rare and important Bechstein’s Bat, only now found in a few parts of southern England, Wales, and mainland Europe.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2434	Consultee Mr Julian Bower	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 691512	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed development in my opinion had three major merits:- It was likely to bring more younger people to the village. This had a number of advantages including further children to be educated at Chapmanslade Village School. The plans I saw included a children's play ground.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2435	Consultee Mr Julian Bower	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 691512	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The development was sufficiently large to enable inclusion of a reasonable number of affordable homes. Additional text - as background to my message [below], I thought you should know that a detailed survey of the residents relating to the future of Chapmanslade apparently had a majority (62%) in favour of more affordable homes. I understand that there were some 500 responses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2436	Consultee Mr Julian Bower	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 691512	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Being set back from the main street it would not have detracted from the village's overall character and appearance and, indeed, with good quality housing, could have been an improvement.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2437	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Further Planning History There has been at least one previous attempt to build on this site. In 1990 planning application W89/0140 was rejected by West Wiltshire District Council. An application to build 2 houses here was rejected as it would be to the detriment of the rural character of the area, and as it would extend the built-up area into open countryside. And this proposal was just for 2 dwellings – today’s plans are for many more houses. The planning decision document also mentioned in passing the ‘busy nature of the A361’ and road traffic issues. 27 years later this aspect is much more significant, and we now have the confirmation following the Conservative Government’s eventual publication in 2017 of its plan to tackle air pollution, much of it from motor vehicles, which is quoted as causing up to 40,000 premature deaths p.a. in the UK.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2438	Consultee Norma Scott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132805		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My objection to the plan is that it is not "Sound". The Land is not suitable for development it is vital to the well being of,people, fauna and flora. An ancient Bridle Way has already been tarmaced over (perhaps in the hope that it is out of sight out of mind)? The proposed housing development will alter the flood plain and lead to flooding. Air and noise pollution will inevitably occur owing to increased population and motor vehicle exhausts. It is unsound because it smacks of vested interest. In these times of political cynicism,Is it sound for a Council to totally disregard the local wshes of the people it represents?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2439	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Further Planning History There has been at least one previous attempt to build on this site. In 1990 planning application W89/0140 was rejected by West Wiltshire District Council. An application to build 2 houses here was rejected as it would be to the detriment of the rural character of the area, and as it would extend the built-up area into open countryside. And this proposal was just for 2 dwellings – today’s plans are for many more houses. The planning decision document also mentioned in passing the ‘busy nature of the A361’ and road traffic issues. 27 years later this aspect is much more significant, and we now have the confirmation following the Conservative Government’s eventual publication in 2017 of its plan to tackle air pollution, much of it from motor vehicles, which is quoted as causing up to 40,000 premature deaths p.a. in the UK.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2440	Consultee Mr C Hazzard Brimble, Lea and Partners	Agent Mr Diccon Carpendale Brimble Lea and Partners	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 449233	Person ID: 1122261	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.68			Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The plan has assessed that there is no need to identify additional land at Mere for further residential development. However, it is proposed to revise the settlement boundary in various areas on the edge of the settlement. One proposal is to include land at Townsend Nurseries (see F7,F8,G7,G8 and H7). But the reason given in the community area topic paper - Mere (June 2017) is to "amend boundary to include employment development that is physically related to the settlement".</p> <p>All of the land at Townsend Nurseries is previously developed and is the most logical area for residential development to meet the future housing needs of the settlement.</p> <p>This site is far more suited and is deliverable (landowners have shown an interest in the site being redeveloped) than the land directly to the west of the site where permission is currently being sought for a sizeable speculative development by Richborough Estates.</p> <p>In particular land between SHLAA sites S99A and S99B (land to the rear of Hinton, Townsend)- see area edged green on settlement boundary plan for Mere attached is unconstrained, suitable and available for development comprising a logical "rounding off", on the eastern side of the site and between two projections running north and south on the existing/proposed settlement boundaries which effectively enclose this area.</p> <p>The plan needs to be reassessed to take into account recent ministerial statements or it will immediately become out of date (and therefore subject to challenge). Parts 4 & 5 of the plan need to be revisited. With regard to Mere, the Nursery site and the specific area of land (land to the rear of Hinton) - see area edged green on settlement boundary plan for Mere - are unconstrained, suitable and available for development. With the land being deliverable to meet what will now have to be an increased housing supply figure this is the most logical location for additional growth at Mere. In the circumstances, following a reassessment of the process, consideration should be given to amending the proposed settlement boundary to include the land to the rear of Hinton which comprises a logical rounding off/enclosing of land which has settlement</p>				
Attached files (Please see Objective)	4729817				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2441	Consultee Dolphin Farms Ltd Person ID: 1132344	Agent Mr Glenn Godwin Director Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	No
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.11 South Wiltshire HMA - Distribution of housing development 2006-2026			Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Dolphin Farms Ltd does not support table 4.11 but gives details as to why it is unsound. On behalf of Dolphin Farms Ltd, Pegasus has commented on Table 4.1 of the WHSAP (Housing Land Supply for Wiltshire HMAs) and considered that the residual requirement for the South Wiltshire HMA be increased by 1300 homes to 1,894 to reflect that the Churchfields and Central Car Park sites in Salisbury are highly unlikely to be developed within the plan period. As these sites are located in Salisbury, the Principal Settlement within the South Wiltshire HMA, it is submitted that the OAN must be provided for within the plan period. The effect of the increased residual requirement in the HMA would impact on Table 4.11 of the WHSAP (South Wiltshire HMA - distribution of housing development 2006-2026). The table sets out the developable commitments for Salisbury to be 3,833. This figure includes the Churchfields and Central Car Park allocations, despite the WHSAP's stating in supporting text at paragraph 4.66 that the Churchfields allocation is expected to commence later than envisaged and much less land for new housing will be available before 2026. Commercial space at Churchfields is available to let and there is no evidence to indicate that the decant process will commence. Similarly, the Central Car Park site is in commercial use with no evidence or application coming forward to indicate its deliverability within the plan period. Pegasus submit there is no realistic prospect of these sites coming forward in the plan period and that they should not be elide upon in the supply of housing land. Accordingly, the developable commitments for Salisbury at Table 4.11 should be reduced by 1300 to 2,533. The removal of these commitments results in a residual requirement of 723 homes in the Salisbury and Wilton Community Area. Housing allocations have been proposed in the Salisbury and Wilton Community Area for 795 homes which would, if developed meet the revised OAN as suggested above. However, Pegasus has stated in representations to the WHSAP that Netherhampton Road sited (S1027 & S1028) totalling 740 dwellings should not be included as allocations at this stage given the number of unknown and unresolved technical issues. Notwithstanding this, research indicates that it would be 2026 at the earliest for development to commence at Netherhampton Road (see representations made in relation to Policy H3.1). Dolphin Farms Ltd can provide land that is available and deliverable for sustainable developable of about 350 dwellings (Site S801) within the plan period, to address part of the shortfall that has been identified above. The purpose of the Housing SDite Allocations Plan is to provide surety in the supply of housing land in the plan period. This would be better achieved by replacing the strategic mixed use allocation (S1028) with a number of alternative sustainable housing sites. On behalf of Dolphin Farms Ltd, Pegasus submit that the developable commitments for Salisbury at Table 4.11 should be reduced by 1300 to 2,533. The removal of these commitments results in a residual requirement of 723 homes in the Salisbury and Wilton Community Area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you	Dolphin Farms Ltd has good local knowledge and would welcome discussion on the assumptions made within the housing land supply and the appropriate level of housing to be allocated.				

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	2442	Consultee Mr C Hazzard Brimble, Lea and Partners	Agent Mr Diccon Carpendale Brimble Lea and Partners	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 449233	Person ID: 1122261	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.68			Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>All of the land at Townsend Nurseries is previously developed and is the most logical area for residential development to meet the future housing needs of the settlement.</p> <p>This site is far more suited and is deliverable (landowners have shown an interest in the site being redeveloped) than the land directly to the west of the site where permission is currently being sought for a sizeable speculative development by Richborough Estates.</p> <p>In particular land between SHLAA sites S99A and S99B (land to the rear of Hinton, Townsend)- see area edged green on settlement boundary plan for Mere attached is unconstrained, suitable and available for development comprising a logical "rounding off", on the eastern side of the site and between two projections running north and south on the existing/proposed settlement boundaries which effectively enclose this area. It is considered that the assessment process both in terms of the housing delivery strategy (how many homes are needed and where?) and proposed housing site allocations is flawed.</p> <p>The assessment of need must now be considered out of date following recent ministerial announcements of proposals that the manner by which the level of housing need is assessed must be based upon the disparities between average incomes and average house prices. This process is likely to identify a significant additional quantum of housing to be delivered across the Wiltshire Council area. For this reason, the assessment that no further growth is required at Mere (because the level of housing growth at the settlement is broadly in line with plan requirements) is now out of date and incorrect.</p> <p>Because of the assumptions made by Wiltshire Council, none of the SHLAA sites on the periphery of the settlement have been considered (as has been the case in those locations where additional growth is considered to be necessary). These sites will need to be reassessed with a view to identifying and allocating suitable sites for additional housing developments to meet the emerging (revised) requirements.</p> <p>The plan needs to be reassessed to take into account recent ministerial statements or it will immediately become out of date (and therefore subject to challenge). Parts 4 & 5 of the plan need to be revisited. With regard to Mere, the Nursery site and the specific area of land (land to the rear of Hinton) - see area edged green on settlement boundary plan for Mere - are unconstrained, suitable and available for development. With the land being deliverable to meet what will now have to be an increased housing supply figure this is the most logical location for additional growth at Mere. In the circumstances, following a reassessment of the process, consideration should be given to amending the proposed settlement boundary to include the land to the rear of Hinton which comprises a logical rounding off/enclosing of land which has settlement</p>				
Attached files (Please see Objective)	4729817				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2443	Consultee Mr Ian Buick	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1132855		Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10 Barbers Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The provision of the Wiltshire Housing Site Allocations Plan in respect of Site 316 in Chapmanslade is an essential element in the future health of the village. Individual new properties which have been built in Chapmanslade in recent years do not in any way satisfy the demand for affordable housing, as they have invariably been larger houses at high prices. Only a larger development which has the scope for Wiltshire Council to insist on the inclusion of affordable housing will enable the village to begin to recover from the price inflation effect which has forced the children of residents and other first time buyers to live away from this community. If the site development is not allowed to proceed, the future of this land is possibly going to be seriously in question. I would urge the inspector to approve this plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2444	Consultee Tom Murphy	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132869		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I strongly disapprove of the proposal for a further forty houses to be built on the Ridgeway Farm site in Tetbury Lane, Crudwell, in addition to the ten houses already being built. Crudwell is a village of some two hundred and sixty dwellings. It has no shops, a very limited bus service, with no buses after 5.30pm and none at all on Sundays. It lies predominantly on one side of the extremely busy A429. A further forty houses would incur a greatly increased traffic flow to and from the A429 on to Tetbury Lane, with the associated air and noise pollution, and danger to pedestrians, especially the young and the elderly. This country lane is ill-equipped to handle extra traffic safely.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2445	Consultee Tom Murphy	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132869		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding is also a major concern for many residents of Crudwell. I understand that it will not present a problem on the development site itself, but it will certainly present a huge problem in other parts of the village. Lower areas such as along and near Tuners Lane, where the Swill Brook flows, have experienced horrendous flooding in the past. Ten years ago twelve houses in this part of the village were badly flooded, along with others at the other end of the village. The antiquated pumping station is situated at the lower end, near Tuners Lane. Engineers from Wessex Water have admitted, on more than one occasion, that the pumping station is inadequate for the size of the village. They have also stated that improvements cannot be made without huge investment being undertaken, and that this will not happen as their budget is insufficient for such an investment.</p> <p>The major problems with flooding have largely occurred since previous developments were built. How much worse will these problems become with another forty dwellings? As a resident whose house has been flooded on more than one occasion, I dread to contemplate it.</p> <p>The planned additional forty houses goes against the Crudwell Development Plan currently being drawn up. not because the villagers of Crudwell are against any new developments, but because these must be planned in accordance with the needs and wishes of the villagers. I understand that the current Wiltshire Plan forecasts that there are more than enough new dwellings being planned and built in the Malmesbury area. There is, therefore, no strategic need for a development of the size being planned for Ridgeway Farm.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2446	Consultee The Orders of St John Care Trust Person ID: 711399	Agent Ms Emma Norman Planner GVA Person ID: 1132875	Do you consider the draft WHSAP is legally compliant?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	Yes
Please identify the policy, paragraph, table, figure or site to which you are referring.	Omission site - Semington				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SEE ATTACHED LOCATION PLAN AND LETTER. The following representation is written on behalf of our client 'The Order of St John Care Trust' to promote their land interest at Semington, Wiltshire, BA14 6JW for a field that is approximately 3.26 ha in size (see appendix I). The site is to the south east of the village, adjoining the settlement boundary along the High Street; the Council gritting depot is to the immediate south. The site benefits from an extant permission for a motel (Reference: W/74/00403/) which was granted permission in September 1979. The consent was implemented by way of the access being constructed; this should be considered relevant as the principle of urban form has been considered acceptable on the site. The site is being promoted for residential development, with the extant permission on site, proximity to the settlement boundary and excellent connection to the A361 and A350 this is an outstanding site to bring sustainable development to the area. Topic Paper 3 Housing Land Supply (July 2017) sets out the Wiltshire Housing minimum requirement to 2026 as 24,740. Of this number 12,603 have been completed and there is a deliverable supply (to 2022) of 8,922. This leaves a residual requirement of 3,215. Development commitments (to 2026) are increased in the draft Site Allocation Plan to 11,566 leaving a minimum allocation of 571. Paragraph 4.2 of the draft Site Allocations Plan recognises that a surplus above this number is required to meet the housing requirements of the National Planning Policy Framework (NPPF). Part of the housing commitments are made up by windfall sites; as per the NPPF paragraph 48 windfall sites may only be included if evidenced robustly. Table A5: Summary of windfall evidence of the Housing Land Supply. Table A5 sets out a per annum delivery of windfall sites of 185. Table 4.7 of the draft housing allocations sets out a windfall allowance of 2,086 from 2017 to 2026. This equates to a per annum delivery of 231 dwellings. There is no justification given for the per annum increase. If the information used from the Housing Land Supply Statement (update) April 2016 is used the windfall delivery rate between 2017 and 2026 is 1,665, leaving a reduced surplus of 2,289. Though it is not disagreed that the current surplus is above the current buffer required it is stressed that the housing target is a minimum that requires a healthy surplus to deliver the required housing in the Local Planning Authority Area. This is in keeping with the NPPF paragraph 47 to 'boost significantly the supply of housing' and the message given in Housing White Paper: Fixing our broken housing market: "We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system." Theresa May Semington is considered to be a large village (Adopted Wiltshire Core Strategy January 2015), this is defined as a village with a limited range of employment, services and facilities. Core Policy 2 accepts that there is a presumption in favour of sustainable development at these locations.			

	<p>Other planning policy with regards to development outside the settlement boundary do not apply as by virtue of extant permission W/74/00403/ the area has already been deemed acceptable for development in the countryside.</p> <p>As it stands Semington has not been allocated for any growth, though there have been some minor amendments to the settlement boundary. A change to the settlement boundary to reflect the submitted redline and subsequent allocation within the Wiltshire Housing Site Allocation Plan will allow a site with an extant permission to come forward with as part of a plan lead approach.</p> <p>The site is well related to the existing settlement and benefits from excellent transport links to Melksham, Trowbridge and the wider area. With its extant permission and already created access it presents an excellent permission to provide housing in a sustainable location to help provide much needed housing in a desirable area.</p>
Attached files (Please see Objective)	4729894 / 4729895
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2447	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.51			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, SPC are not in favour of the proposed settlement boundary changes that this HSAP would bring and do not support Wiltshire Council's proposals in this respect.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2448	Consultee Mr Peter White Parish Clerk Southwick Parish Council Person ID: 1132724	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Southwick Parish Council (SPC) is completely in favour of Wiltshire having a robust, strategic house-building plan. In this respect, SPC is very keen to see a local plan that is equitable, caters for local housing need and that takes fully into account the limitations of existing infrastructure and employment opportunities.</p> <p>However, SPC are completely against the proposed large-scale development of c180 new residential dwellings on the open Greenfield site known as Southwick Court, Firs Hill/Frome Road, Southwick, (SHLAA site 3565).</p> <p>Please see full details of our strongest objections to the proposed development at Southwick Court/SHLAA Site 3565 below: These objections are based on Southwick's settlement boundary remaining 'as is'.</p> <p>Lack of Co-ordination with Southwick's Neighbourhood Plan.</p> <p>There appears to have been a complete failure here, as the local planning authority should work with the qualifying body (i.e. Southwick Parish Council) to produce complementary Neighbourhood and Local Plans.</p> <p>Based on the standards required by the Localism Act 2011 and subsequent Planning Practice Guidance the proposal to include Southwick Court within the HSAP is contrary to Southwick's Neighbourhood Plan Area Designation (approved May 2016)</p> <p>As part of the Core Strategy, open land at West Ashton and Yarnbrook has been designated for the build of 2500/3000 new dwellings. We believe that Southwick Division has made more than enough in terms of sacrificing open Greenfield spaces in order to accommodate the Ashton Park development alone.</p> <p>Further open Greenfield sacrifice in Southwick Division would not only be unfair. It would also 'break the bank' in terms of available infrastructure to support it, especially in terms of traffic volumes and school places (please see my comments in 7 below).</p> <p>So why is Southwick being targeted and having imposed upon it, the building of another 180+ new homes on precious open Greenfield that is located outside of its existing settlement boundary? There is absolutely no justification for this.</p> <p>We suggest that you look elsewhere other than Southwick to achieve your target figures. You can achieve your targets by paying particular attention to potential brownfield sites in and around Trowbridge, as per the resolution and proposals raised by Trowbridge Town Council meeting on 5th Sept. 2017.</p> <p>We are also concerned that the area of land designated to develop 180 new dwellings has the capacity for up to 280 new dwellings. Indeed as SHLAA site 3565, a conservative total of 237 dwellings have been quoted.</p> <p>SPC's concern is that the area on the map within the documented proposal denoted with a 'red line' is far too large. Any intention to retain a Greenfield space as part of the area designated for development will be quickly consumed for further development once the settlement boundary change has been approved.</p> <p>In principle, Southwick Parish Council fully supports the protections that a robust HSAP/Local Plan can bring against non-strategic /speculative developments.</p> <p>However, SPC have very serious concerns regarding the proposal to build on the area of land known as Southwick Court.</p>				

	<p>This proposal has not been included in Southwick's Neighbourhood Plan. The proposal does not bring with it any tangible benefits for the village, existing residents or for future residents.</p> <p>Southwick Parish Council seeks to work with Wiltshire Council to ensure a robust Local Plan is produced and trust that Wiltshire Council will support its people in this matter.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2449	Consultee Mr Peter White Parish Clerk Southwick Parish Council Person ID: 1132724	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Contradiction to Core Policy: The proposed development of up to 180 houses is not required in our area (Trowbridge remainder). Please refer to Wiltshire Council's Housing Land Supply Statement Table: Housing delivery compared to annualized requirement (page 6) and appendix 6 - Summary assessment of supply and remaining housing to be identified (page 101). Southwick has already exceeded its duty in terms of contribution to housing in the region. Being part of the Trowbridge Community Area Remainder, it has an indicative requirement for years 2006 - 2026 of 165 new homes, with 242 completions to 2016, leaving an indicative remaining requirement of zero new builds up to 2026. Looking at the broader picture, North and West Wiltshire have already exceeded its five-year land supply (5.73 years vs. 5.25 years target). Building of an additional 180 new homes on this site would be superfluous and contrary to CP1, CP2, CP51, CP57, CP60, and CP61 of the Wiltshire Core Strategy 2015 and the policies of the NPPF taken as a whole." By Wiltshire Council's own figures, Southwick is already above target in the amount of affordable housing it has created in the village. Developments on the old Mowlem site, Lewis Court and Swan Court plus smaller 'in-fill' development are evidence of this, producing 77 new affordable homes in total. 21 of these homes were planned for local people in the village. Just one was allocated on The Mowlem's/Swan Court site to a local resident and again just one in Lewis Court. Also, to impose this housing development on the Southwick community, when there is zero demand for housing would also conflict with the Localism Act 2011. In addition, the allocation of proposed new housing numbers between Trowbridge and Chippenham is inequitable. Why is Chippenham only expected to build 4810 new dwellings? Trowbridge, with far inferior infrastructure and employment opportunities, has been targeted to build many, many more new dwellings when compared to Chippenham. There is clearly a disparity here that needs to be resolved. Chippenham area needs to give up a greater number of sites for development purposes. If Chippenham, with its far superior infrastructure links and employment opportunities, actually delivered its fair share of new housing numbers, the need to build on Southwick Court would completely diminish. SPC would also urge you to ensure that the rate of building on the development at Yarnbrook/West Ashton is duly accelerated now that the Bechstein's Bat issue has been resolved. The developers no longer have an excuse to protract delivery of the new homes promised on this site any further.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	2450	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Settlement 'In-Fill': Any housing development on this site would be in-fill between settlements and would be in direct conflict with Wiltshire's Green Infrastructure Strategy. Core Policy 29 also advises that open countryside should be maintained to protect the character and identity of Southwick as a village. The balance of the village community and cohesive nature of the local population would be put at risk. The village sense of identity will be eroded as the population expands and Southwick becomes just another suburb of Trowbridge. The proposal is detrimental to the overall identity of Southwick as a village and there is a real risk that Southwick would become just a suburb of Trowbridge due to erosion of the protective green buffer.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2451	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Site Allocation Plan: Assuming that the proposed settlement boundary changes do not go ahead, this proposed development site is outside the current limits of development for Southwick and therefore in breach of CP2				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2452	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Loss of Amenity: This attractive open site is part of the very fabric of the community and provides a significant heritage setting. Any sort of housing development on this site would create a detrimental visual impact on the immediate neighbourhood and a detrimental impact on the village generally when compared to what we have now.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2453	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The development would alter the general feel of the village and it would no longer have the same visual and spiritual appeal. In addition, Southwick currently enjoys the benefit of 'big skies' both during the day but especially at night. These 'big skies' in Southwick will be a thing of the past if this development is allowed to go ahead.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2454	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Campaign for the Protection of Rural England (CPRE) has published a new detailed picture of England's light pollution at night using satellite data captured at 1:30am throughout September 2015. Nationwide, they show that just 22% of England is untouched by night-time light pollution. This research comes at a time of increased awareness of the harmful effects of light pollution on people and wildlife. In addition, Local Councils were estimated to spend £613m on street lighting in 2014-15. Those lights account for between 15-30% of council's carbon emissions. Increased noise and air pollution from additional traffic should also be considered and the impact these will have on existing and future residents of Southwick. The impact of this on resident's health and well being needs to be fully considered, given the Government's recent findings regarding the link between traffic pollution, dementia and chronic respiratory diseases.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2455	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Nocturnal wildlife will also be adversely impacted by light pollution, especially the rare breeds of bats that use this site as their home and flight path. Impact on Wildlife and habitat. This site supports an entire eco-system resulting in an abundance of wildlife, including Deer, Birds of Prey, Foxes and Badger. It also supports rare and endangered species, including Water Vole, Newts, Slowworm, Bats, and Kingfishers. But in particular, we need to mention the presence of Bechstein's Bats (<i>Myotis bechsteinii</i>) in the immediate area. We have already seen the impact of Bechstein's Bats on the local Persimmon development. Do we really want to see another development in West Wilts halted in its tracks because of impact to protected species and their habitat?</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2456	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Erosion of Greenfield: Government policy and its directive to Local Authorities are not to allow development on Greenfield sites. "The Government supports building on brownfield sites and not Greenfield sites"</p> <p>This is official Government policy as demonstrated by the Government going ahead with its new garden towns and villages programme where brownfield sites are being prioritised for the development of 200,000 new homes across the UK.</p> <p>Media coverage (Peston on Sunday 5th Feb ITV) and a Government White Paper supports the conservation of Greenfield.</p> <p>Southwick has already been forced to give up large areas of Greenfield following Wiltshire Council's decision to allow the construction of two solar farms in the village. Both of these sites are visually detracting, spoiling the open countryside. It would be unfair to expect the residents of Southwick to have to sacrifice more Greenfield, especially as it does not need any further housing to support local needs</p> <p>Therefore, as the local authority, Wiltshire Council needs to have exhausted all brownfield options in the Trowbridge area before it considers Greenfield sites for development purposes.</p> <p>Then and only then, should Greenfield sites be considered as an exception to Government policy.</p> <p>In this respect we urge you to fully reconsider inclusion of this site as part of the HSAP and to source appropriate brown field sites in instead. The old Bowyers site in Trowbridge must be a prime candidate for development and we cannot understand from the information available to us, why this site is not up for greater consideration as part of the HSAP.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2457	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure: The Government has stated that before building in an area the infrastructure has to be in place before further development takes place. Core Policy 1- Southwick is a village with very limited infrastructure, employment and general services. Southwick should be considered unsuitable for large scale housing developments because it would put already inadequate services under even more pressure This would fall contrary to Core Policy 1-par; 17 of the NPPF and does not meet the housing needs of Southwick. Southwick's existing utilities are already over stretched. Without doubt, this development will put extra pressure and may even 'break' the existing infrastructure. Higher capacity sub-stations, more or bigger gas pipes and sewerage waste pipes will no doubt be required, leading to digging up of the roads and general disturbance for existing residence. Schools and other amenities. Based on current information and projections, we would suggest that at least 2-3 new Secondary Schools will need to be built in and around Trowbridge to accommodate the 5000/6000 new pupils generated by Ashton Park plus the other developments illustrated in the HSAP. In this respect, the current plans for new secondary schools in the area are wholly inadequate. Eventual demand for places will not be met. Primary School places are also at a premium, with just enough places available to There seems to be a general lack of planning to ensure available primary school places for the families affected by the HSAP generally, not just those on the proposed development at Southwick Court. Also, lets not lose sight of the impact that the Ashton Park development will have on primary school places in the area generally. Our concern is that over-crowding and lower academic/behavioural standards in existing primary schools will be the result.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2458	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Waste Water & Sewage: West Wiltshire District Plan U1a - Advises that development will only be permitted where adequate foul drainage and sewerage facilities are suitable or arrangements made for their provision. Has any consideration been given to upgrading existing sewage and waste water systems as part of this proposal? We suspect not, which is a major mistake given the experience Southwick has had with the large-scale development at the old Mowlem site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2459	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council Person ID: 1132724		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Increase in Traffic Volumes, to from and within the village: Core Policy 60 -Advises the Council to use it's planning and transport powers to reduce the need for travel, especially by car. This in conjunction with Core Policy 61 advises that new developments should be located with this in mind. Also to encourage alternative sustainable methods of travel (i.e. walking, cycling and by buses/public transport). On the proposal, there will be 180 new dwellings. If there is an average of 2 new cars per household, there will be c 400 additional vehicles using A361 Frome Road on a regular basis. There are no designated cycle-ways in the area. Bus travel is not a viable option for many, as buses do not run a service post 17:00 each day. The distance to Trowbridge Train Station is greater than the 1.8km optimal walking distance to make this development sustainable. Therefore the only viable transport solution aligned to this proposal will be the increased used of motorised vehicles, which is contrary to CP60. Full consideration should also be given to the increase volume of vehicle traffic on local roads due to the additional c3000 new homes being built in Yarnbrook and West Ashton. At an average of 2 cars per household this would introduce 6000+ vehicles onto local roads that are already struggling to cope with existing volumes. Vehicle access from the Yarnbrook towards the A361/Frome Road will certainly impact Southwick to its detriment. Access. The details emerging with regard to site access are, at best, confusing. There are flaws with all of the options muted and there does not appear to be a 'natural choice' in terms of access to and from this site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2460	Consultee Mr Peter White Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Southwick Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding: Southwick already has serious issues with flooding, although the various agencies do not seem to have any record of this. However, the documented proposal recognises that a part of the site at Southwick Court is a floodplain of the Lambrook River.</p> <p>The NPPF clearly states that: "The identification of functional flood plain should take account of local circumstances and not defined solely on rigid probability parameters". Strong historical and local evidence shows that the Lambrook floodplains on this site and at other sites in Southwick flood far more regularly and with greater intensity than the average parameter guidelines set out in the NPPF. In this respect, please refer to the Operational Flood Working Group for specific details on flood risk on this site and impact to other areas of Southwick.</p> <p>Also, Core Policy 67 requires all new development to include measures to reduce rainwater runoff and improve rainwater infiltration to soil and ground.</p> <p>Overall, SPC do don't believe that the engineering solutions being proposed for this site will alleviate flood risk to an acceptable level. Also the knock on effect of water diversion still needs to be fully considered and evaluated.</p> <p>We request that the developer and/ or the existing landowner should also be made to set aside funds in order to compensate future flood victims in the village should suffer serious flooding as a result of this proposal.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2461	Consultee Oxford University Endowment Management Person ID: 642979	Agent Mr Matthew Dawber Savills Person ID: 1100945	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	North and West HMA				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Savills is instructed by OUEM Ltd to submit representations on the Wiltshire Site Housing Allocations DPD – Pre-Submission Draft. These representations relate specifically to proposed residential development at Whitehill Lane, Royal Wootton Bassett. These representations also make comments on the proposed amendments to the settlement boundaries of Royal Wootton Bassett. The matters will be discussed in turn below.</p> <p>Proposed Housing Allocations Royal Wootton Bassett is classified as ‘Market Town’ within the Wiltshire Core Strategy (WCS), which is the second highest settlement category in the County. As such, the WCS states that Market Towns have the potential to make a significant contribution towards the provision of homes and jobs. Furthermore, Royal Wootton Bassett is the closest major tier settlement to Swindon, which is a key employment centre in the region, and has excellent public transport links. Royal Wootton Bassett is a Market Town and accordingly displays a high level of services and facilities. Adding to the sustainability credentials of the town is its proximity to Swindon. Therefore, it is surprising that there have only been two housing allocations of any significant size in the last decade, both of which appeared in the Wiltshire Local Plan (adopted June 2006). A further 110 dwellings are proposed at Maple Drive, Royal Wootton Bassett through the town’s Neighbourhood Plan, which is currently awaiting a date for its examination. However, given the sustainability credentials of the settlement one would expect a greater number of housing allocations. While it is understood that the Housing Site Allocations DPD has sought to only allocate in localities that are not deemed to have met their housing requirements as set out in the WCS (Core Policy 2), the allocation of significant numbers of houses in villages such as Hullavington, Crudwell and Bratton does not represent sustainable development. This is owing to the fact that there are significant opportunities for development in higher tier settlements, such as Royal Wootton Bassett, which offer greater services within them, as well as more sustainable access to regional centres.</p> <p>In order to maximise the potential for sustainable development, the Council should include the enclosed site at Whitehill Lane in order to ensure that opportunities presented by the higher tier settlements in the County with the best links to employment facilities are maximised. The Site Allocations DPD should also acknowledge the fact that the housing requirement figure as outlined in the WCS for between 2006 and 2026 is soon to be out of date and the Council will need to plan for a new evidence based housing need. This is owing to the fact that the publication of the Wiltshire and Swindon SHMA is expected soon and also the fact that the Government has recently published its standardised methodology for the calculation of housing need for consultation. Although only for consultation at this stage, the calculation shows a 127 dwelling per annum increase in the housing requirement from the 2,100 per annum figure in the Core Strategy to a new 2,227 figure.</p>			

	<p>This clearly shows that the need for housing in the County will soon increase and the Council should plan accordingly. The identification of further sites in the North and West Housing Market Area, which had the largest need for housing according to the WCS (60% of the 42,000 housing requirement in the plan was identified in this area), would seem to be a logical response to meet these needs.</p> <p>Failing the identification of Whitehill Lane as a full housing allocation, the Housing Site Allocation DPD should include the site as a 'reserve site' in order to contribute towards meeting a higher housing requirement.</p>
Attached files (Please see Objective)	4729916
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2462	Consultee Mrs Dawn Wasey Person ID: 1132907	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Please take this letter as a formal objection to the allocation of a further 40 dwellings at Ridgeway Farm, Crudwell, currently contained within the Wiltshire 'draft' Housing Site Allocation Plan under consultation.</p> <p>As a parish resident for over 20 years, I strongly objected to the planning proposal on the site for 30 dwellings in 2014, which was refused, and consider the subsequent permission granted for a far smaller development of 10 units (already underway) should be the absolute maximum . I understand that the housing landscape has changed / evolved over the last few years, with allocations now coming out from central government to meet UK wide expected needs both the short and longer terms. What I did not appreciate, however, was any parish, which had not had the foresight to draw up (and get approved) a detailed 'Neighbourhood Plan', was totally exposed to having seemingly 'unlimited development' in its parish with no grounds for objection!</p> <p>I feel that the whole village has been let down first and foremost by its Parish Councillors, who did not bring the village vulnerability to the residents' attention until this '11th hour'. Additionally, the County Councillors, and nearby Parish Councillors, clearly aware of Crudwell's exposure to imposition of unwanted development, have seemingly 'kept quiet', thus ensuring that Neighbourhood Plan's for their own Parishes have been well progressed / approved and villages such as Crudwell would have to accept development these Parishes do not want!</p> <p>Whilst we have been led to believe that the land owner for the Ridgeway Farm land is aggressively looking to sell off their land for residential development, and a development of one large development as opposed to several smaller ones would be less for the County to administer, I am firmly of the view that the many objections (listed below) raised by Crudwell Parishioners in 2014 – which were accepted by the County Council – remain apposite and accordingly should be upheld as the reasons for refusing further Planning Permission for the Farm site.</p> <p>Should it be identified that there is a pressing need for further housing within Crudwell Parish, there are several sites on which it would be more suitable to be built upon than Ridgeway Farm – the majority of which would be to the East of the A429, although, I am clearly not aware whether those land owners would be willing to sell for such a purpose. As part of the Crudwell Neighbourhood Plan such sites will clearly need to be considered, if the other overriding hurdles to further development in the parish can be overcome.</p> <p>For clarity, I list below my main objections to the Ridgeway Farm proposed further development, with the non site specific objections clearly hurdles which would also need to be overcome / mitigated should further development in the Parish be considered necessary / appropriate.</p> <p>Objections:-</p> <ul style="list-style-type: none"> • The proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Site Allocations Plan is too large a number for a village of c200 existing homes. A total of 29 units on the site was rightly refused planning in 2014 so allowing 50 makes no sense whatsoever! <p>I support the assertion that Crudwell is not anti-growth; it would simply like to plan for any growth itself, via the emerging Neighbourhood Plan which I believe is now well advanced. It may well be that the Parish plan may suggest that it might be sensible to grow places like Cricklade, Purton and Lyneham (where there would appear to be more pressing and genuine need) before growing Crudwell because the impact in these locations will be less dramatic.</p>			

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2463	Consultee Mrs Dawn Wasey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132907		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>For clarity, I list below my main objections to the Ridgeway Farm proposed further development, with the non site specific objections clearly hurdles which would also need to be overcome / mitigated should further development in the Parish be considered necessary / appropriate.</p> <p>Objections:-</p> <ul style="list-style-type: none"> • Crudwell has severe flooding problems. A large proportion of the village is at risk of flooding from waterways, surface water, or both. The topography of the land will ensure that any further development to the West of the A429 will further burden the overworked pumping station at the ford on Tuners Lane which will take the brunt of the pressure. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2464	Consultee Oxford University Endowment Management	Agent Mr Matthew Dawber Savills	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 642979	Person ID: 1100945	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site Maple Drive, Royal Wootton Bassett			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Savills have previously submitted representations on earlier drafts of the Site Allocations DPD in relation to Whitehill Lane, Royal Wootton Bassett. I have enclosed a layout of the scheme which demonstrates that the site is suitable for a mix of residential development (circa 150 dwellings) in conjunction with a site for allotments and public open space. Indeed, this site was included in a draft of the Royal Wootton Bassett Neighbourhood Plan dated 2015. This draft allocation was supported by a raft of technical reports covering the following matters: Arboriculture; Ecology; Heritage; Landscape; and Highways. While high level, these reports confirmed that there are no technical constraints present on the site that would limit its ability to accommodate circa 150 dwellings.				
Attached files (Please see Objective)	4729915 / 4729916				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2465	Consultee Mrs Dawn Wasey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132907	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Serious concerns about road capacity and safety, and environmental impacts of new development on the landscape and wildlife. The A429 is already massively in need of repair and attention on the stretch through the village which has been untouched in 20+ years and I am horrified at the prospect of mass development down effectively a single carriageway country lane which Tetbury/Crudwell Lane cannot support without surface and road safety improvements.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2466	Consultee Oxford University Endowment Management	Agent Mr Matthew Dawber Savills	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 642979	Person ID: 1100945	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.44 Royal Wootton Bassett Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Settlement Boundary Review</p> <p>The proposed amendments to the Settlement Boundary of Royal Wootton Bassett are not appropriate as they are currently shown. This is owing to the fact that the methodology underpinning this, as shown in Topic Paper 1 – Settlement Boundary Review Methodology, is flawed. The methodology states that existing allocations, such as the extant employment allocation at Templars Way Industrial Estate, should not be included within the boundary. This approach limits the value of identifying a boundary as it will be redundant as soon as significant allocations are implemented beyond it.</p> <p>This is also the case in terms of the draft Neighbourhood Plan allocation at Maple Drive. The adoption of the Neighbourhood Plan and subsequent implementation of the allocation will result in significant residential development beyond the settlement boundary. This is a type of development explicitly not favoured within the WCS. As such, the adoption of a revised settlement boundary as set out currently, would result in a contradiction between the WCS, Neighbourhood Plan and the Site Allocations DPD.</p> <p>The boundary should therefore be reviewed in order to include the aforementioned Templars Way Industrial Estate allocation to the south of the town and the emerging Neighbourhood Plan allocation to the west to ensure consistency between the WCS, Neighbourhood Plan and Site Allocations DPD.</p>				
Attached files (Please see Objective)	4729916				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2467	Consultee Mrs Dawn Wasey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132907	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> • I understand from Wiltshire Council's Education Department that new homes will require an additional classroom at Crudwell's CE Primary School. This is on a constrained site and lies in a conservation area. Its ability to expand is not guaranteed and there is already an impact on the highway based on the number of existing pupils attending the school. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2468	Consultee Ms Sandra Moore	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132928	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to object to the inclusion of Site 3565 - Southwick Court in the Trowbridge Site Allocation Plan, and the proposed building of 200 houses.</p> <p>Housing on this site would not only contradict government policy of building on brownfield sites in preference to Greenfield, but would cause massive problems in its creation and existence for current residents.</p> <p>The development of Site 3565 has been opposed by the Town Council and alternatives for a greater number of dwellings have been proposed.</p> <p>There is no need to turn our beautiful countryside into tarmac & concrete, and forever lose this valuable space.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2469	Consultee Ms Sandra Moore	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132928	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to object to the inclusion of Site 3565 - Southwick Court in the Trowbridge Site Allocation Plan, and the proposed building of 200 houses.</p> <p>Given that much of the building would take place in an area of notified flooding and standing surface water, existing residents would have their property seriously threatened by an increased risk of flooding</p> <p>The development of Site 3565 has been opposed by the Town Council and alternatives for a greater number of dwellings have been proposed.</p> <p>There is no need to turn our beautiful countryside into tarmac & concrete, and forever lose this valuable space.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2470	Consultee Ms Sandra Moore	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132928	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to object to the inclusion of Site 3565 - Southwick Court in the Trowbridge Site Allocation Plan, and the proposed building of 200 houses.</p> <p>In particular access from the north, via Sandringham Road to the proposed development @ Southwick Court would:-</p> <p>Turn a quiet cul-de-sac into a "rat-run".</p> <p>Cause even more congestion on Silver St Lane, which is a busy link between the A361 & A363.</p> <p>The development of Site 3565 has been opposed by the Town Council and alternatives for a greater number of dwellings have been proposed.</p> <p>There is no need to turn our beautiful countryside into tarmac & concrete, and forever lose this valuable space.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2471	Consultee Ms Sandra Moore	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132928		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to object to the inclusion of Site 3565 - Southwick Court in the Trowbridge Site Allocation Plan, and the proposed building of 200 houses.</p> <p>In particular access from the north, via Sandringham Road to the proposed development @ Southwick Court would:- Breach a "protected "hedgerow to the south of Sandringham Road.</p> <p>The development of Site 3565 has been opposed by the Town Council and alternatives for a greater number of dwellings have been proposed. There is no need to turn our beautiful countryside into tarmac & concrete, and forever lose this valuable space.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2472	Consultee Ms Sandra Moore	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132928		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to object to the inclusion of Site 3565 - Southwick Court in the Trowbridge Site Allocation Plan, and the proposed building of 200 houses.</p> <p>In particular access from the north, via Sandringham Road to the proposed development @ Southwick Court would:- Build a road through the communal grass space, which is part of the original planning conditions for the Home Farm Development in 1971. The development of Site 3565 has been opposed by the Town Council and alternatives for a greater number of dwellings have been proposed. There is no need to turn our beautiful countryside into tarmac & concrete, and forever lose this valuable space.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2473	Consultee Sian Burke-Murphy	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132949		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I objected to the Ridgeway Farm planning application for 29 houses back in 2014 on the basis that that scale of the development at that one site in the village is unsustainable: Increased traffic on Tetbury lane would be a danger to the many pre-school and primary school children who walk that lane daily. It is outside the red line settlement boundary and not even adjacent to it!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2474	Consultee Sian Burke-Murphy	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132949		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I objected to the Ridgeway Farm planning application for 29 houses back in 2014 on the basis that that scale of the development at that one site in the village is unsustainable: Crudwell Primary School is oversubscribed and capacity to expand is restricted.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2475	Consultee Sian Burke-Murphy	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132949		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I objected to the Ridgeway Farm planning application for 29 houses back in 2014 on the basis that that scale of the development at that one site in the village is unsustainable: The scale of the development was much larger than previous developments in the village and would create a pinch point on the very narrow Tetbury lane which would compound the drainage and sewerage problems in Crudwell as the systems are already overburdened.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2476	Consultee Sian Burke-Murphy	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132949	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to register my opposition to the proposed allocation of an additional 40 houses in Crudwell, on the Ridgeway Farm site as per the Draft Site Allocations Plan. There is no immediate, strategic need or justification to allocate new homes to Crudwell and the Draft Site Allocations Plan should not do so. I am also concerned that the site size / boundary of the Ridgeway Farm Development encompasses an area larger than that which would be required for 40 homes - so I question why that is the case and would like it reviewed.</p> <p>I also do not think that the allocation is justified when you look at your own guidance or notes within the Site allocations Plan. This states that housing sites will only be allocated where there is a strategic priority to do so. From the data available, the Site Allocation Plan currently results in an oversupply of some 4,300 dwellings to 2026 when you take into account past completions with deliverable commitments and windfall sites; even excluding windfall sites, the oversupply is still 2,200 across the housing market area. More specifically, the Site Allocations Plan results in an oversupply of homes in the Malmesbury Community Area; Wiltshire Council also has a history of oversupply of dwellings - in eight of the last ten years, more homes have been built than planned and over that period the over supply has been over 140% of target.</p> <p>I strongly believe that the emerging Neighbourhood Plan in consultation with and with full engagement of the local community and businesses should determine the scale and type of housing need in Crudwell. The Neighbourhood Plan would examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity. The consultation will also help determine from local businesses what their needs might be to enable them to sustain and expand employment opportunities going forward.</p> <p>The Crudwell Neighbourhood Plan is progressing at a pace, with the full support of the community and so whilst it may not be at 2nd draft stage (where it carries more weight) by February 2018, given there is NO IMMEDIATE STRATEGIC NEED to allocate homes to Crudwell, I strongly believe that the Ridgeway farm site should be removed from the Draft Site Allocations Plan to allow our Neighbourhood Plan to be completed to a stage where IT can inform decisions about how and where our village grows. I am not anti-development....I want to ensure my children and grandchildren can live in the village if they choose to. I am however in favour of sensible development with full engagement of the local community.</p> <p>Policy 1 of the Wiltshire Core Strategy notes that the "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", given that we have circa 250 homes in Crudwell, I do not see how an additional 40 homes on top of the 10 already being built - a staggering 20% increase overall - even falls within Wiltshire Councils own Core strategy.</p> <p>I, along with many other villagers and parishioners, was in favour of the 10 houses houses which were finally agreed. I was gobsmacked when suddenly this allocation for 40 additional houses appeared on this site which was previously considered unsuitable.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2477	Consultee Five Rivers Homes Ltd Person ID: 1132956	Agent Mr Stephen Young Senior Planning Consultant Pro Vision Person ID: 902049	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.65				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SEE ATTACHED document: Five Rivers Homes Ltd - Representation to Draft Wilts Housing Allocations 22.09.17 - Para 4.65</p> <p>SETTLEMENT BOUNDARY - SALISBURY</p> <p>Table 8.1 of the Wiltshire Housing Site Allocations Plan (WHSAP) Topic Paper 1 (Settlement Boundary Review Methodology) indicates that the proposed settlement boundaries are now intended to include:</p> <ul style="list-style-type: none"> • “commenced residential and community facilities...that is physically elated to the settlement” • “built...employment development in principal settlements, market towns and local service centres that is physically related to the settlement” <p>but to exclude allocations or unimplemented planning permissions.</p> <p>Salisbury is a Principal Settlement. Thus commenced permissions and/or existing employment sites should be included within the proposed boundaries.</p> <p>There is, however, significant inconsistency regarding how the principles of Table 8.1 have been applied to the proposed settlement boundaries. For example:</p> <p>a) Fugglestone Red has commenced and is under construction. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area of outline permission S/2012/0814 and Phase 1A RM permission 15/05120/REM lies outside the proposed settlement boundary for Salisbury (Cells E3-4 and F3-5).</p> <p>b) Longhedges, approved by 13/00673/OUT and 15/07253/REM, has also commenced. A number of properties have been sold. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area lies outside the proposed settlement boundary for Old Sarum (Cells J1-2, K1-2 & L1).</p> <p>c) A 200 unit scheme on the NE of Calne, approved by N/11/03524/OUT and 15/05831/REM, has also commenced. Many of the properties have been allocated postal addresses by the Council. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area lies outside the proposed settlement boundary for Calne (Cells G4-6, H4-6).</p> <p>d) A 12 unit scheme, in close proximity to (c) and approved by 14/03053/OUT and 15/07282/REM, has also commenced. Some of the properties have been allocated postal addresses by the Council. By virtue of the criteria in Table 8.1, this site should be within a settlement. However, the area lies outside the proposed settlement boundary for Calne (Cell J6).</p> <p>The proposed alterations to a number of settlement boundaries are therefore not correctly related to the criteria by which they should be drawn. This error applies to a number of very significant developments within Wiltshire. There should therefore be a complete revisit of all the settlement boundaries to ensure that the criteria of Table 8.1 are being correctly applied.</p> <p>For the avoidance of doubt these representations seek, as part of the reassessment of all the settlement boundaries to ensure correct application of the principles in Table 8.1 of the Housing Topic Paper on settlement boundaries, the continued inclusion of the Castle Works site, Salisbury (SP1 3SB at SU141 319; see plan 1476-P01) within the settlement boundary on the grounds that it is an existing employment development that</p>				

	<p>is physically related to the development this supports the proposed boundary of Salisbury as drawn in the Salisbury settlement boundary (Cell J5);</p> <p>PARAGRAPH 4.65</p> <p>The draft Housing Allocations Plan acknowledges that the WCS for Salisbury would deliver sufficiently within the plan period to meet housing requirements and . The Allocation Plan then proceeds to bolster supply at Salisbury, in the event of undersupply from Churchfields, by allocating Land at Netherhampton Road.</p> <p>Notwithstanding this additional allocation, this paragraph should be amended to indicate that, provided other sites also comply with the Policies of the Wiltshire Core Strategy, these other developments within the settlement boundary would also be acceptable alongside the allocations. Without such clarification / addition, the current Draft implies that only allocated development will be acceptable.</p> <p>Paragraph 4.65 should therefore be amended as follows (additions in italics):</p> <p>A shortage of land could impede the City's prospects and it could also lead to greater development pressures in other settlements in the HMA less suited to growth. In any event, it should be recognised that other sites, not allocated within this document, may be developed or redeveloped alongside the allocations proposed here. This would be on the condition that those sites demonstrate compliance with the Policies of the Wiltshire Core Strategy. Sites to which this comment would relate would include the Castle Works site on Castle Road, where the Council resolved to grant permission in December 2014.</p>
<p>Attached files (Please see Objective)</p>	<p>4729950</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2478	Consultee Mr Robert Sparke Person ID: 1132963	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The draft Wiltshire Housing Site Allocation Plan (WHSAP) document as made available at the public exhibition held at County Hall Trowbridge (Wed 26 July 2017) presents a summary of the WHSAP and makes a number of statements and assertions which I consider to be unsound (whether not positively prepared, not justified, not effective or possibly not consistent with national policy).</p> <p>Accordingly I am providing my comments, as requested by the council. I have not found the representation form to be user-friendly way of doing this and I am therefore providing my comments in these separate pages (pages 4-6). I have attached these to the representation form (pages 1-3) as these provide you with my personal details for your reference.</p> <p>My comments refer to the WHSAP document with some reference to the Wiltshire Core Strategy (WCS). As I live in North Bradley I make specific reference to three sites within the Trowbridge Community – these being Elm Grove Farm (ref H2.1), A363 White Horse Park (ref H2.2) and Southwick Court (ref H2.6). I also make some general comments that are not directed to these three sites in particular but are relevant. My comments follow:</p> <p>Southwick and North Bradley – Separate Communities</p> <p>North Bradley and Southwick are recognised in the WCS as large villages surrounding Trowbridge and that these have separate and distinct identities as villages. These villages reflect the rural nature of the county. The WCS goes on to say that open countryside should be maintained to protect the character and identity of these villages as separate communities. Therefore all three proposed sites (H2.1, H2.2 and H2.6) are unsound proposals as they are in direct conflict with the WCS. The SCW additionally states that at the settlements identified as villages, a limited level of development will be supported in order to help retain the viability of these communities. At large village settlements (i.e. Southwick, North Bradley) settlement boundaries are retained and development will take the form of small housing (defined as sites involving fewer than 10 dwellings and not a major application) and employment sites within settlement boundaries.</p> <p>The WCS goes on to say that these local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning. It is my understanding that both Southwick and North Bradley have submitted neighbourhood plans and therefore I do not understand why these proposed sites should be considered further.</p> <p>Flooding and Wildlife</p> <p>Plan areas H2.1 and H2.2 are both adjacent to Woodmarsh lands which I suspect have that name for a reason. Throughout the year and particularly in the winter months these (current) fields are prone to flooding – these areas are not at risk of flooding that are guaranteed to do so. If you have ever walked these areas you would know this. This evidence by the ‘lake of rainwater’ that gathers by the roadside and on the lower part of the football field beside the Woodmarsh road (even though there has been some drainage work undertaken on the football field itself) every time a moderate amount of rainfall happens. Covering these fields in concrete and with houses will only make matters worse.</p> <p>Within the WCS there is a requirement for all development in Trowbridge to be sensitive to wildlife and wildlife sites. There is reference to bats to the south east of Trowbridge. I am not privileged or informed as to the exact location of these – however I do know that I am able to sit at the rear of my property on many evenings at dusk and witness a number of bats flying over my garden as they feed and fly freely.</p>				

Infrastructure and Employment

The WCS the WHSAP document focuses almost totally on allocating sites to make sure there is sufficient housing land supply as required by the WCS (it states so). It goes on to say that significant housing development has already taken place since 2006 and that there are also significant commitments for new homes including allocations within the WCS. It then adds that further housing sites are necessary. It further states that there is a focus on settlements where there is a shortfall in housing and where there is a need to introduce new sites. To my mind there appears to be a blind pursuit of building houses to 'meet a plan number' and in response to a failing government pledge to build more houses without any serious consideration to the wider issues of infrastructure (such as transport, employment and public services) – even those as stated in the council's own WCS.

The WCS states that development will be managed to ensure that jobs and the right infrastructure are delivered at the right time to ensure that out-commuting is not increased and development does not have a detrimental impact on the infrastructure. The WCS further states that adequate services and infrastructure provision are brought forward in a timely and responsive manner alongside new development proposals (to include highway improvements). It adds that measures will have been implemented which reduce traffic delays and disruption, safety for all road users will have been improved and the impact of traffic speeds in towns and villages mitigated.

I have lived in Woodmarsh for over 30 years and I have only witnessed an evening increase in traffic volume and density along with greater disruption and therefore an increased risk to safety for both road users and importantly also pedestrian and cycle users. The A350 road becomes busier and busier as each year passes. The amendments to the West Ashton crossroads have only moved the log-jams elsewhere. Journeys on the A350 from the M4 through our area to Westbury and beyond take longer and longer. The promise to mitigate issues has fallen well short.

The road through North Bradley (Yarnbrook to Trowbridge and visa versa) also suffers from speeding traffic as it is used as a short cut (or rat run). Additionally the increase in traffic using the Bradley Road into (and out of) Trowbridge caused both by the increase in commuting traffic and as a result of the two retail centres on Bradley Road means that the traffic regularly backs up around the White Horse business park road and also backs up into North Bradley all up Woodmarsh. A traffic incident or a road closure (whether in the immediate area or elsewhere) often results in a near grid-lock, exacerbated by frustrated drivers then turning around in a fruitless search for a quicker way.

North Bradley road into Trowbridge, with all outward traffic from the two retail centres being directed one way upon exit has become a busy road and one that is hazardous for pedestrian to cross. The proposed H2.1 and H2.2 do not specify in detail how they will access the road infrastructure but they will only worsen the traffic situation further. Does somebody have to be killed crossing an even busier road such as Bradley Road before it is realised that the traffic/highway infrastructure is unacceptable and failing against the WCS requirements?

Before any further development is proposed or takes place significant improvements to the traffic infrastructure have to be both planned and implemented. If the developments are allowed to proceed first the situation just gets worse – and the infrastructure improvements just don't happen.

With regards to employment, and the WCS requirement to manage development to ensure that out-commuting is not increased, this is probably already being conflicted. We have already seen considerable housing development in the Trowbridge area with little or no inward investment that has resulted in high value skilled jobs (as called for in the WCS). I can, however, recall Virgin pulling out of the area. Building houses will not create an environment in which investment will be attracted in high value skilled jobs. Rather it has a tendency to attract employment where the requirements are for low skills and minimum wages are paid.

Other Infrastructure

As a general comment our hospital(s), doctors, dentists and schools are coming under increasing pressure and are struggling to cope to provide a decent (or any in some instances) service. Building more houses will not help with this unless additional infrastructure is put in place. This has to be put in first – if left to later it somehow does not seem to happen. As an example of this – I am informed that there was a Doctor's surgery planned for Paxcroft Mead but it never happened – The Red Admiral (or whatever it is now called) happened instead. In order to ensure that the services form or Infrastructure is improved it must be put in place before the houses are built that are then accommodated by the people that demand an increasing service from these services.

In closing, I had further points to make. I request an extension to the closing deadline but I was refused this. I fully understand this – please allow me to apologise for the slightly dis-organised nature of these pages which have been drafted in a rush.

Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I fear that this Plan will be steam-rolled through without the local community/people of Trowbridge and North Bradley being given any genuine consideration. I believe this to be an important matter.

Comment ID:	2479	Consultee Mr Robert Sparke Person ID: 1132963	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Coalescence			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Southwick and North Bradley – Separate Communities North Bradley and Southwick are recognised in the WCS as large villages surrounding Trowbridge and that these have separate and distinct identities as villages. These villages reflect the rural nature of the county. The WCS goes on to say that open countryside should be maintained to protect the character and identity of these villages as separate communities. Therefore all three proposed sites (H2.1, H2.2 and H2.6) are unsound proposals as they are in direct conflict with the WCS. The SCW additionally states that at the settlements identified as villages, a limited level of development will be supported in order to help retain the viability of these communities. At large village settlements (i.e. Southwick, North Bradley) settlement boundaries are retained and development will take the form of small housing (defined as sites involving fewer than 10 dwellings and not a major application) and employment sites within settlement boundaries. The WCS goes on to say that these local communities may wish to consider this matter in more detail in any future community-led neighbourhood planning. It is my understanding that both Southwick and North Bradley have submitted neighbourhood plans and therefore I do not understand why these proposed sites should be considered further.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2480	Consultee Ms Barbara Belkacem	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 899954	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not positively prepared because it does not meet objectively assessed development requirements. WC propose to increase the size of Trowbridge by one quarter during the Plan period (and more after that) which exceeds the requirement for a five year supply. The Plan is not effective because WC's examination of 'windfall', which is expected to provide 60% of new housing, is grossly inadequate - comprising one page out of 4,500 pages of the Plan documents. The changes that are necessary to the plan are set out precisely in the submissions made by the Trowbridge Town Council (Mr Lance Allan - 06/09/2017) and the Hilperton Gap Action Group (Mr George Bundy - 19/09/2017)				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2481	Consultee Ms Barbara Belkacem	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 899954	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan is not justified because WC have failed to explain how and when the jobs, schools, roads and other services and infrastructure will be provided to support this huge expansion.</p> <p>The changes that are necessary to the plan are set out precisely in the submissions made by the Trowbridge Town Council (Mr Lance Allan - 06/09/2017) and the Hilperton Gap Action Group (Mr George Bundy - 19/09/2017)</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2482	Consultee Ms Barbara Belkacem	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 899954	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Plan is not consistent with national policy because WC has failed to give proper weight to brown field sites. WC's method of calculating the potential contribution from brown field is inadequate, especially in Trowbridge where town centre derelict sites should provide hundreds of homes The changes that are necessary to the plan are set out precisely in the submissions made by the Trowbridge Town Council (Mr Lance Allan - 06/09/2017) and the Hilperton Gap Action Group (Mr George Bundy - 19/09/2017)				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2483	Consultee Mr Robert Sparke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132963		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding and Wildlife Plan areas H2.1 and H2.2 are both adjacent to Woodmarsh lands which I suspect have that name for a reason. Throughout the year and particularly in the winter months these (current) fields are prone to flooding – these areas are not at risk of flooding that are guaranteed to do so. If you have ever walked these areas you would know this. This evidence by the 'lake of rainwater' that gathers by the roadside and on the lower part of the football field beside the Woodmarsh road (even though there has been some drainage work undertaken on the football field itself) every time a moderate amount of rainfall happens. Covering these fields in concrete and with houses will only make matters worse.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2484	Consultee Mr Robert Sparke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132963		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Within the WCS there is a requirement for all development in Trowbridge to be sensitive to wildlife and wildlife sites. There is reference to bats to the south east of Trowbridge. I am not privileged or informed as to the exact location of these – however I do know that I am able to sit at the rear of my property on many evenings at dusk and witness a number of bats flying over my garden as they feed and fly freely.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2485	Consultee Mr Robert Sparke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132963		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding and Wildlife Plan areas H2.1 and H2.2 are both adjacent to Woodmarsh lands which I suspect have that name for a reason. Throughout the year and particularly in the winter months these (current) fields are prone to flooding – these areas are not at risk of flooding that are guaranteed to do so. If you have ever walked these areas you would know this. This evidence by the 'lake of rainwater' that gathers by the roadside and on the lower part of the football field beside the Woodmarsh road (even though there has been some drainage work undertaken on the football field itself) every time a moderate amount of rainfall happens. Covering these fields in concrete and with houses will only make matters worse.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2486	Consultee Mr Gregor Condliffe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132978		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to comment on the proposed development and in particular that outside the city boundary at Netherhampton and also on other allied matters concerning the general policy as applied to housing and specifically relating to the Netherhampton site.</p> <p>MY comments are based on my view that the WHSAP is not objective .</p> <p>A housing crisis exists particularly in respect of affordable housing.It is the prime concern particularly in a high cost housing market as exists in Salisbury. The Netherhampton site being large is likely to be taken up by one of the large housing deveolpers. Only a small no of what they term affordable are likely to be constructed. Those that are will not be to Parker Morris Standard of old which ensures internal accommodation is flexible and of usable dimensions. IT is therefore unlikely to meet the real need to house those in most need.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2487	Consultee Mr Gregor Condliffe	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132978		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to comment on the proposed development and in particular that outside the city boundary at Netherhampton and also on other allied matters concerning the general policy as applied to housing and specifically relating to the Netherhampton site.</p> <p>MY comments are based on my view that the WHSAP is not objective .</p> <p>The site is outside the City boundary and is not a continuous part of the existing city which it needs to be, to be considered as part of a South Wilts Planning proposal It is also in conflict with the part of our existing local strategy for the maintenance of important green spaces and the setting of the Medieval city.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2488	Consultee Mr Gregor Condliffe Person ID: 1132978	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to comment on the proposed development and in particular that outside the city boundary at Netherhampton and also on other allied matters concerning the general policy as applied to housing and specifically relating to the Netherhampton site.</p> <p>MY comments are based on my view that the WHSAP is not objective .</p> <p>The broad plan does not identify sites with highway infrastructure and their capacity to take Further development. IN order to properly identify sites ,a study of available capacity is a prime task and would of itself properly identify sites with additional sustainable housing capacity.</p> <p>I do not consider that WHSAP is sound for other local reasons.</p> <p>The impact on the highway infrastructure from the West of the city which passes over the Avon Bridge was demonstrated when reduced to 2 lanes (necessary repair), impacted back to East of Alderbury by- pass and interfered with the inner ring road. The bridge is a bottleneck where only major alterations to both the A3094 and Exeter st. roundabouts could effect improvement. WE have no data or scheme to know if it were possible and the cost impact .It would need to be done in tandem with any significant increase in development and especially that on the A3094 . There is no doubt 740 houses could via developer contribution provide a school.</p> <p>However that itself would contribute massively to traffic congestion at peak times.</p> <p>Should the school be in the East Harham area as actually was a consideration of a previous County Council in the 1980s. The effect could be to reduce traffic by localising it in the East.</p> <p>Traffic flow could be improved by reconsidering the opportunity to easily make a pedestrian underpass to the North of the A3094 junction. There is however a question concerning fibre optic cabling that some think is present. That itself would be a complication and may render any improvement impossible.</p> <p>In conclusion, I am not opposed to small schemes of really affordable housing off Netherhampton Road but the highways implications still need to be sustainable.</p> <p>Decisions need to be made taking into account impact on Salisbury,s highway network and known problems of parts that are over capacity and for which there are currently no adequate proposals. WE do not need piecemeal development to make matters worse I consider the strategy the community is being asked to comment on lacks sufficient real detail and is pre emptive. The total traffic could in fact be increased with more housing on the Wellworthy site . A question needs to be asked about whether the designation of this site as industrial has been change to Mixed which would of itself make housing numbers even larger than the consultation proposes. This information is lacking.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	2489	Consultee Mr Robert Sparke	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132963	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Within the WCS there is a requirement for all development in Trowbridge to be sensitive to wildlife and wildlife sites. There is reference to bats to the south east of Trowbridge. I am not privileged or informed as to the exact location of these – however I do know that I am able to sit at the rear of my property on many evenings at dusk and witness a number of bats flying over my garden as they feed and fly freely.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2490	Consultee Mr Robert Sparke Person ID: 1132963	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Infrastructure and Employment</p> <p>The WCS the WHSAP document focuses almost totally on allocating sites to make sure these is sufficient housing land supply as required by the WCS (it states so). It goes on to say that significant housing development has already taken place since 2006 and that there are also significant commitments for new homes including allocations within the WCS. It then adds that further housing sites are necessary. It further states that there is a focus on settlements where there is a shortfall in housing and where there is a need to introduce new sites. To my mind there appears to be a blind pursuit of building houses to 'meet a plan number' and in response to a failing government pledge to build more houses without any serious consideration to the wider issues of infrastructure (such as transport, employment and public services) – even those as stated in the council's own WCS.</p> <p>The WCS states that development will be managed to ensure that jobs and the right infrastructure are delivered at the right time to ensure that out-commuting is not increased and development does not have a detrimental impact on the infrastructure. The WCS further states that adequate services and infrastructure provision are brought forward in a timely and responsive manner alongside new development proposals (to include highway improvements). It adds that measures will have been implemented which reduce traffic delays and disruption, safety for all road users will have been improved and the impact of traffic speeds in towns and villages mitigated.</p> <p>I have lived in Woodmarsh for over 30 years and I have only witnessed an evening increase in traffic volume and density along with greater disruption and therefore an increased risk to safety for both road users and importantly also pedestrian and cycle users. The A350 road becomes busier and busier as each year passes. The amendments to the West Ashton crossroads have only moved the log-lams elsewhere. Journeys on the A350 from the M4 through our area to Westbury and beyond take longer and longer. The promise to mitigate issues has fallen well short.</p> <p>The road through North Bradley (Yarnbrook to Trowbridge and vice versa) also suffers from speeding traffic as it is used as a short cut (or rat run). Additionally the increase in traffic using the Bradley Road into (and out of) Trowbridge caused both by the increase in commuting traffic and as a result of the two retail centres on Bradley Road means that the traffic regularly backs up around the White Horse business park road and also backs up into North Bradley all up Woodmarsh. A traffic incident or a road closure (whether in the immediate area or elsewhere) often results in a near grid-lock, exacerbated by frustrated drivers then turning around in a fruitless search for a quicker way.</p> <p>North Bradley road into Trowbridge, with all outward traffic from the two retail centres being directed one way upon exit has become a busy road and one that is hazardous for pedestrian to cross. The proposed H2.1 and H2.2 do not specify in detail how they will access the road infrastructure but they will only worsen the traffic situation further. Does somebody have to be killed crossing an even busier road such as Bradley Road before it is realised that the traffic/highway infrastructure is unacceptable and failing against the WCS requirements?</p> <p>Before any further development is proposed or takes place significant improvements to the traffic infrastructure have to be both planned and implemented. If the developments are allowed to proceed first the situation just gets worse – and the infrastructure improvements just don't happen.</p>				

	<p>With regards to employment, and the WCS requirement to manage development to ensure that out-commuting is not increased, this is probably already being conflicted. We have already seen considerable housing development in the Trowbridge area with little or no inward investment that has resulted in high value skilled jobs (as called for in the WCS). I can, however, recall Virgin pulling out of the area. Building houses will not create an environment in which investment will be attracted in high value skilled jobs. Rather it has a tendency to attract employment where the requirements are for low skills and minimum wages are paid.</p> <p>Other Infrastructure As a general comment our hospital(s), doctors, dentists and schools are coming under increasing pressure and are struggling to cope to provide a decent (or any in some instances) service. Building more houses will not help with this unless additional infrastructure is put in place. This has to be put in first – if left to later it somehow does not seem to happen. As an example of this – I am informed that there was a Doctor’s surgery planned for Paxcroft Mead but it never happened – The Red Admiral (ot whatever it is now called) happened instead. In order to ensure that the services form or Infrastructure is improved it must be put in place before the houses are built that are then accommodated by the people that demand an increasing service from these services.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2491	Consultee Mr Robert Sparke Person ID: 1132963	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure and Employment</p> <p>The WCS the WHSAP document focuses almost totally on allocating sites to make sure these is sufficient housing land supply as required by the WCS (it states so). It goes on to say that significant housing development has already taken place since 2006 and that there are also significant commitments for new homes including allocations within the WCS. It then adds that further housing sites are necessary. It further states that there is a focus on settlements where there is a shortfall in housing and where there is a need to introduce new sites. To my mind there appears to be a blind pursuit of building houses to ‘meet a plan number’ and in response to a failing government pledge to build more houses without any serious consideration to the wider issues of infrastructure (such as transport, employment and public services) – even those as stated in the council’s own WCS.</p> <p>The WCS states that development will be managed to ensure that jobs and the right infrastructure are delivered at the right time to ensure that out-commuting is not increased and development does not have a detrimental impact on the infrastructure. The WCS further states that adequate services and infrastructure provision are brought forward in a timely and responsive manner alongside new development proposals (to include highway improvements). It adds that measures will have been implemented which reduce traffic delays and disruption, safety for all road users will have been improved and the impact of traffic speeds in towns and villages mitigated.</p> <p>I have lived in Woodmarsh for over 30 years and I have only witnessed an evening increase in traffic volume and density along with greater disruption and therefore an increased risk to safety for both road users and importantly also pedestrian and cycle users. The A350 road becomes busier and busier as each year passes. The amendments to the West Ashton crossroads have only moved the log-lams elsewhere. Journeys on the A350 from the M4 through our area to Westbury and beyond take longer and longer. The promise to mitigate issues has fallen well short.</p> <p>The road through North Bradley (Yarnbrook to Trowbridge and vice versa) also suffers from speeding traffic as it is used as a short cut (or rat run). Additionally the increase in traffic using the Bradley Road into (and out of) Trowbridge caused both by the increase in commuting traffic and as a result of the two retail centres on Bradley Road means that the traffic regularly backs up around the White Horse business park road and also backs up into North Bradley all up Woodmarsh. A traffic incident or a road closure (whether in the immediate area or elsewhere) often results in a near grid-lock, exacerbated by frustrated drivers then turning around in a fruitless search for a quicker way.</p> <p>North Bradley road into Trowbridge, with all outward traffic from the two retail centres being directed one way upon exit has become a busy road and one that is hazardous for pedestrian to cross. The proposed H2.1 and H2.2 do not specify in detail how they will access the road infrastructure but they will only worsen the traffic situation further. Does somebody have to be killed crossing an even busier road such as Bradley Road before it is realised that the traffic/highway infrastructure is unacceptable and failing against the WCS requirements?</p> <p>Before any further development is proposed or takes place significant improvements to the traffic infrastructure have to be both planned and implemented. If the developments are allowed to proceed first the situation just gets worse – and the infrastructure improvements just don’t happen.</p>				

	<p>With regards to employment, and the WCS requirement to manage development to ensure that out-commuting is not increased, this is probably already being conflicted. We have already seen considerable housing development in the Trowbridge area with little or no inward investment that has resulted in high value skilled jobs (as called for in the WCS). I can, however, recall Virgin pulling out of the area. Building houses will not create an environment in which investment will be attracted in high value skilled jobs. Rather it has a tendency to attract employment where the requirements are for low skills and minimum wages are paid.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2492	Consultee Five Rivers Homes Ltd Person ID: 1132956	Agent Mr Stephen Young Senior Planning Consultant Pro Vision Person ID: 902049	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure			Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Salisbury Settlement Boundary				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SEE ATTACHED DOCUMENT: Five Rivers Homes Ltd - Representation to Draft Wilts Housing Allocations 22.09.17 - Salisbury Settlement Boundary SETTLEMENT BOUNDARY - SALISBURY Table 8.1 of the Wiltshire Housing Site Allocations Plan (WHSAP) Topic Paper 1 (Settlement Boundary Review Methodology) indicates that the proposed settlement boundaries are now intended to include: • “commenced residential and community facilities...that is physically elated to the settlement” • “built...employment development in principal settlements, market towns and local service centres that is physically related to the settlement” but to exclude allocations or unimplemented planning permissions. Salisbury is a Principal Settlement. Thus commenced permissions and/or existing employment sites should be included within the proposed boundaries. There is, however, significant inconsistency regarding how the principles of Table 8.1 have been applied to the proposed settlement boundaries. For example: a) Fugglestone Red has commenced and is under construction. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area of outline permission S/2012/0814 and Phase 1A RM permission 15/05120/REM lies outside the proposed settlement boundary for Salisbury (Cells E3-4 and F3-5). b) Longhedges, approved by 13/00673/OUT and 15/07253/REM, has also commenced. A number of properties have been sold. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area lies outside the proposed settlement boundary for Old Sarum (Cells J1-2, K1-2 & L1). c) A 200 unit scheme on the NE of Calne, approved by N/11/03524/OUT and 15/05831/REM, has also commenced. Many of the properties have been allocated postal addresses by the Council. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area lies outside the proposed settlement boundary for Calne (Cells G4-6, H4-6). d) A 12 unit scheme, in close proximity to (c) and approved by 14/03053/OUT and 15/07282/REM, has also commenced. Some of the properties have been allocated postal addresses by the Council. By virtue of the criteria in Table 8.1, this site should be within a settlement. However, the area lies outside the proposed settlement boundary for Calne (Cell J6). The proposed alterations to a number of settlement boundaries are therefore not correctly related to the criteria by which they should be drawn. This error applies to a number of very significant developments within Wiltshire. There should therefore be a complete revisit of all the settlement boundaries to ensure that the criteria of Table 8.1 are being correctly applied. For the avoidance of doubt these representations seek, as part of the reassessment of all the settlement boundaries to ensure correct application of the principles in Table 8.1 of the Housing Topic Paper on settlement boundaries, the continued inclusion of the Castle Works site, Salisbury				

	<p>(SP1 3SB at SU141 319; see plan 1476-P01) within the settlement boundary on the grounds that it is an existing employment development that is physically related to the development this supports the proposed boundary of Salisbury as drawn in the Salisbury settlement boundary (Cell J5);</p> <p>PARAGRAPH 4.65</p> <p>The draft Housing Allocations Plan acknowledges that the WCS for Salisbury would deliver sufficiently within the plan period to meet housing requirements and . The Allocation Plan then proceeds to bolster supply at Salisbury, in the event of undersupply from Churchfields, by allocating Land at Netherhampton Road.</p> <p>Notwithstanding this additional allocation, this paragraph should be amended to indicate that, provided other sites also comply with the Policies of the Wiltshire Core Strategy, these other developments within the settlement boundary would also be acceptable alongside the allocations. Without such clarification / addition, the current Draft implies that only allocated development will be acceptable.</p> <p>Paragraph 4.65 should therefore be amended as follows (additions in italics):</p> <p>A shortage of land could impede the City's prospects and it could also lead to greater development pressures in other settlements in the HMA less suited to growth. In any event, it should be recognised that other sites, not allocated within this document, may be developed or redeveloped alongside the allocations proposed here. This would be on the condition that those sites demonstrate compliance with the Policies of the Wiltshire Core Strategy. Sites to which this comment would relate would include the Castle Works site on Castle Road, where the Council resolved to grant permission in December 2014.</p>
<p>Attached files (Please see Objective)</p>	<p>4729990</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2493	Consultee Orla and Paul Dunn Carder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132219	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 East of the Dene			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I note the proposals that are being made to alter existing settlement boundaries in Salisbury, Trowbridge, and other Market towns to develop these areas, with the purpose of ensuring the delivery of houses in Wiltshire's three Market Town areas for the period up to 2026. I strongly object to ANY changes within Warminster to the existing settlement boundaries, and further allocation of new sites for housing, as the selection of sites is not sound.</p> <p>The proposed plan is NOT sound, and I object strongly for the following reasons:</p> <p>Environment and character of the area</p> <p>The proposed change to the settlement boundary at Home farm is a particularly baffling suggestion. This site has already been rejected by the planning inspector, for a great number of reasons, one of which was due the character of the area, the following was stated by the planning inspector</p> <p>"I saw that the land mostly comprises arable fields, with similar fields to the north, together with a few cottages and other houses (some set in trees) and bounded by lanes or roads, to the east, west and south. Although there is urban development immediately to the west (across Grange Lane), the area has a pleasant and obviously rural appearance and is very much on the edge of Warminster. From my observations from local footpaths to the north, west and east of the area and from Battlesbury Hill I consider that the land relates well in visual terms to the open countryside to the north and east, forming an integral part of the countryside east of the town. I accept that a high stone wall and cottages fronting Boreham Road impact on any meaningful visual relationship with the countryside to the south, other than when seen from the Hill top. However, in view of the open-ness of the land and its linkage with other open land to the east and north (and especially Battlesbury Hill), I consider that the town policy limit hereabouts should be drawn along the eastern edge of the denser development fronting The Dene, St George' Close and (the southern part of) Grange Lane."</p> <p>The character of the area has not changed and these comments are still valid.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2494	Consultee Ms Toril Edwards	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133026		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to object to the proposed development at Southwick Court (Site 3565) and particularly access from its' north side onto Silver Street Lane, via Balmoral or Sandringham Roads.</p> <p>In Trowbridge there are currently a number of derelict sites (many owned by Wiltshire Council) which could be re-developed to help meet the government's housing target for the town. Their development would avoid the destruction of the attractive countryside at Southwick Court, & the merging of Trowbridge & Southwick Parishes which is also incompatible with the policy in the Wiltshire Core Strategy.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2495	Consultee Ms Toril Edwards	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133026		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to object to the proposed development at Southwick Court (Site 3565) and particularly access from its' north side onto Silver Street Lane, via Balmoral or Sandringham Roads.</p> <p>Appendix G, Page 27 - Site 3565 Southwick Court -Accessibility Access to the proposed 200 houses at Southwick Court, via either Balmoral Road or Sandringham Road would:- Cause even more congestion on Silver St Lane, which is a busy link between the A361 & A363. Turn the quiet cul-de-sacs of Balmoral & Sandringham Roads into "rat-runs".</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2496	Consultee Ms Toril Edwards	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133026		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to object to the proposed development at Southwick Court (Site 3565) and particularly access from its' north side onto Silver Street Lane, via Balmoral or Sandringham Roads.</p> <p>Appendix G, Page 27 - Site 3565 Southwick Court -Accessibility Access to the proposed 200 houses at Southwick Court, via either Balmoral Road or Sandringham Road would:- Build roads through communal grass spaces which were allocated as part of the original planning conditions in 1971, for the then Home Farm Development.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2497	Consultee Ms Toril Edwards	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133026		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to object to the proposed development at Southwick Court (Site 3565) and particularly access from its' north side onto Silver Street Lane, via Balmoral or Sandringham Roads.</p> <p>Appendix G, Page 27 - Site 3565 Southwick Court -Accessibility Access to the proposed 200 houses at Southwick Court, via either Balmoral Road or Sandringham Road would:- Breach a "protected "hedgerow to the south of Balmoral & Sandringham Roads.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2498	Consultee Mr Malcolm Oliver Person ID: 1123921	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6 Southwick Court			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Boundary hedgerows / tree lines • Lambrok Stream <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats.</p> <p>This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal.</p> <p>Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2499	Consultee Ms Denise O'Herwell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133076	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Myself and my husband moved to the above address in April 2017. We are dismayed to learn of the above proposal. We chose Sandringham Road because of although being in town, the peace& quiet is like living in the middle of the countryside. Our bungalow backs onto the proposed site and the ground there is a lot higher, meaning that any new houses will be able to see straight into our property invading our privacy and de-valuing our bungalow.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2500	Consultee Ms Denise O'Herwell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133076	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Other worrying factors is that Sandringham Road will become a through road & carry more traffic it can handle.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2501	Consultee Ms Denise O'Herwell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133076	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Land searches on buying this property showed there was a problem a few years ago with main drains when sewage poured out and engulfed many gardens in a very short space of time. With far more properties planned surely the sewers will not cope causing health hazards to all concerned.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2502	Consultee Orla and Paul Dunn Carder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132219	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 East of the Dene			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Wiltshire's Conservation Officer also has grave concerns regarding the impact of development on the Character of the area, and considers the effect on listed buildings and structures in the area, and potentially listable properties in the area. The Conservation Officer also considers it "difficult to see how development of this area would make a positive contribution to local character and distinctiveness".				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2503	Consultee Orla and Paul Dunn Carder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132219	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 East of the Dene			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure</p> <p>The plan has not considered the effect on Warminster's current infrastructure, which is struggling in many areas, for example one of our Doctors' surgeries has recently closed, and it is extremely difficult to get an appointment to see a doctor. This is not the only problematic area, there are many more including (but not limited to) Parking and Education.</p> <p>The plan only increases the number of houses, and makes no provision for increasing or upgrading the infrastructure of the individual areas. Relying on all residents travelling across the town to use a single service only increases the pressure on roads, and discourages people from walking or cycling. No provision is made for local employment in the plan, and the large employment areas of Bath, and Trowbridge will increase the pressure on roads further still. Currently we have problems in the very narrow streets on the B3414 near the centre of Town.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2504	Consultee Orla and Paul Dunn Carder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132219	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 East of the Dene			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding Warminster has a great number of flooding problems at the moment, and it seems that nobody is willing to accept responsibility for managing it. This needs good sound solution to this problem. Home Farm is very wet during periods of heavy rain, and usually has a large pond on it during the winter period. Grange Lane floods regularly. There was a period last year when the Post Office was refusing to deliver letters to some of the properties. Clearly Home Farm is a run off area for water off the high ground to the North of it, and if it were developed the flooding issues will only become worse, with the development potentially increasing the flood risk to existing properties. Boreham Road regularly floods, and with more run off this will become worse.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2505	Consultee Orla and Paul Dunn Carder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132219	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 East of the Dene			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Access The proposed site access is onto Boreham Road. I consider this to be very dangerous. As a resident of Grange Lane, I know how dangerous and difficult it is currently to exit the lane safely due to the fast movement of traffic in this area including around the proposed entrance area. Having the entrance to the site to the south when the main housing development area is to the north also seems contrary and only inviting further applications for development the south of the area. If you must develop this area, why not consider an entrance directly from the roads near the north of the site of Woodcock Road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2506	Consultee Orla and Paul Dunn Carder	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132219	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 East of the Dene			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Justification</p> <p>The increase in the allocation seems to be made as a contingency plan to the existing sound, and well considered delivery plan failing to meet the requirements for the 2026 figures. It seems an overreaction to change settlement boundaries, encouraging development of green field sites when the chances are that the existing plan will deliver the required housing and infrastructure that is required for this housing. The existing site at the West Urban Extension could have its allocation increased to cover this shortfall, and this way all of the issues regarding infrastructure etc will not pose problems. The sound existing plan for the West Urban extension, which was subject to careful consideration to deliver the housing to 2026 was considered sound by a planning inspector previously. Whilst we have some concerns about the negative impact of further development on the West side of town, this has the support of local councilors and as they have been recently reelected, presumably the local population there.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2507	Consultee Orla and Paul Dunn Carder	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132219		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 East of the Dene			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Consistency The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA), thereby managing and reducing risk of flooding throughout Wiltshire. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages. This omission may open up the threat of judicial review should the plan progress as it stands. In summary, I strongly object to any change to the housing numbers and settlement boundaries in Warminster, and want my letter to be brought to the attention of the Planning Inspector's examination currently scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2508	Consultee Mr Alan Parsons Person ID: 1133063	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No evidence of housing need for Yatton Keynell The proposal for 30 houses on land east of Farrells Field has been put forward at County level in order to meet the County's strategic housing requirements for the Chippenham remainder area. The site allocation for 30 houses in Yatton Keynell is not based on any evidence that there is a specific local housing need in Yatton Keynell. Appendix E of the Chippenham Community Area topic paper, confirms that no local housing needs survey was undertaken as part of the draft Plan. The proposed dwellings should be justified with evidence that there is a specific local need and the plan should confirm how that need will be met.</p> <p>In light of the above the plan is unsound, it not justified and is not consistent with national policy set out in paragraph 158 of the NPPF which states: 'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'. Absence of a Neighbourhood Plan Of the five large villages within the Chippenham Community Area, Yatton Keynell is the only village without a Neighbourhood Plan. It is acknowledged that delivery of housing supply through a community led Neighbourhood Plan offers a positive and proactive approach to delivering housing need rather than a site selection process which is only put forward by landowners. The local Ward Councillor called for a Neighbourhood Plan to be made at a Parish Council meeting back in November 2014 (copy of minutes attached). This was suggested in response to specific concerns that were raised by the community in relation to the proposal for development of land adjacent to Farrells Field. The Parish Council have not addressed this request. Notes from the minutes to November 2014 (extract) 'Cllr. Scott advised that Yatton Keynell should look into setting up a neighbourhood plan, which allows people in the village more of a say as to what they want in terms of any developments that may be proposed'. (extract) 'The proposed land is just outside the village boundary for Yatton Keynell, and unless the village see it a necessity the council favours objecting to the development'. (extract) In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be engaged in a proactive way, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made. Site selection process unsound</p>				

	<p>Para 5.13 of the Chippenham Community Area Remainder Topic Paper – June 2017 states that the village of Sutton Benger which has an identified a housing need, was discounted as a village which could accommodate additional housing growth. The Plan states that the village primary school cannot accommodate growth and therefore the village cannot accommodate more housing. The exclusion of the village from the housing allocation plan seems unjustified as the plan should consider all housing types not just those for families. Just because the school is full that doesn't exclude new housing being delivered for elderly, and people without children (flats starter homes). If some additional housing was accepted in Sutton Benger it might reduce the overall need for housing which has been identified in the other larger villages where there is considered no housing need.</p> <p>The village of Yatton Keynell which has no evidence of identified housing need (this is minutes in Parish Council Meeting minutes November 2014), and no Neighbourhood plan has been identified for having a significant proportion of the 138 dwellings needed to meet the Chippenham Area Strategic housing target.</p> <p>The housing sites selection process is contrary to Para 159 of the NPPF. It states: 'Local planning authorities should have a clear understanding of housing needs in their area. They should: -prepare a strategic Housing Market Assessment to assess their full housing needs andThe Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which addresses the need for all types of housing, including affordable housing and the needs of different groups in the community such as but not limited to families with children, older people people with disabilities, service families and people wishing to build their own homes...'; Withdraw the land East of Farrells Field from the Draft Wiltshire Housing Allocation Plan and allow a Neighbourhood Plan to be prepared giving local residents an opportunity to explore other site options in a proactive way, in line with NPPF paragraph 155.</p>
Attached files (Please see Objective)	4730027
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am prepared to participate in an oral discussion on the unsound points if the Draft Wiltshire Housing Allocation Plan.

Comment ID:	2509	Consultee Mr Alan Parsons Person ID: 1133063	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Another factor which was not considered as part of the site selection was the landscape constraints in place for the village Yatton Keynell. A significant amount of Yatton Keynell settlement and adjoining land is washed over by AONB rendering a large area of land that is not available for development. This fact should have been identified as a constraint in the overall site selection process and taken into account when considering the amount of new development proposed in the village.</p> <p>30 dwelling will have a significant impact on the character of the area</p> <p>Para 5.31 identifies land East of Farrells Field, Yatton Keynell for the development of approximately 30 dwellings. The Council claim that 'it is in a location that has the capacity to accommodate change from an environmental, heritage and landscape perspective, and could assimilate into the existing built form, whilst positively conserving and enhancing the village-edge setting'. However, a large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area.</p> <p>Change of Boundary to the Land East of Farrells Field</p> <p>Currently the Land East of Farrells Field is situated outside the village of Yatton Keynell boundary. If permission is granted for the future housing development the current boundary will be amended to include the new site, this will mean the small unique hamlets of Cold Harbour and Tiddlywink will lose their individual communities as the perimeters become linked up. This will change the feel of the entrance to the Cotswold Village of Yatton Keynell which is in an area of outstanding natural beauty.</p> <p>Withdraw the land East of Farrells Field from the Draft Wiltshire Housing Allocation Plan and allow a Neighbourhood Plan to be prepared giving local residents an opportunity to explore other site options in a proactive way, in line with NPPF paragraph 155.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am prepared to participate in an oral discussion on the unsound points if the Draft Wiltshire Housing Allocation Plan.				

Comment ID:	2510	Consultee Mr Alan Parsons	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133063		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure issues</p> <p>Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area. These issues are identified in the site allocation supporting text, and the need for a capacity appraisal and further assessment is required. Infrastructure needs should be identified and established prior to the allocation of the site.</p> <p>Withdraw the land East of Farrells Field from the Draft Wiltshire Housing Allocation Plan and allow a Neighbourhood Plan to be prepared giving local residents an opportunity to explore other site options in a proactive way, in line with NPPF paragraph 155.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am prepared to participate in an oral discussion on the unsound points if the Draft Wiltshire Housing Allocation Plan.				

Comment ID:	2511	Consultee Mr Alan Parsons Person ID: 1133063	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.12			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Lack of community engagement and poor consultation</p> <p>The draft plan process is lengthy, complicated and difficult for the public to become engaged with. The planning process which has taken place and resulted in the Farrells Field site being put forward for housing, has not been meaningful, as it has not provided opportunity for the local community to comment on or consider alternative sites. The Parish Council have not engaged in the plan process or adequately represented the views of the local people in response to the proposal being put forward.</p> <p>I consider the proposed allocation for such a large site which will have such a significant impact on the community in yatton Keynell should be the subject of more meaningful consultation process by means of a Neighbourhood Plan.</p> <p>It is my understanding (from P61 of the Chippenham Community Area Remainder Topic Paper) that of the five large villages identified as part of the Chippenham remaining area, none of the Parish Council's responded to the Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement. It states in para 2.23:</p> <p>'Town and parish councils are the most local tier of democratic representation and, as such, they provide a key link with local communities. They are a specific consultation body under the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires that Wiltshire Council has to consult with specific consultation bodies which they consider may have an interest in the subject. Wiltshire Council is committed to continuing to consult with the local councils'.</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states:</p> <p>'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>Withdraw the land East of Farrells Field from the Draft Wiltshire Housing Allocation Plan and allow a Neighbourhood Plan to be prepared giving local residents an opportunity to explore other site options in a proactive way, in line with NPPF paragraph 155.</p> <p>I am prepared to participate in an oral discussion on the unsound points if the Draft Wiltshire Housing Allocation Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2512	Consultee Rachel Sandy Asset Manager South West	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Highways Agency Person ID: 903251		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Salisbury Sites – impact on A36 There are 740 dwellings proposed on Netherhampton Road. Of these, 640 are identified for land at H3.1 Netherhampton Road, Salisbury' and 100 on land 'H3.3 North of Netherhampton Road'. Policy H3.1 requires "Transport network improvements necessary to accommodate the scale of development envisaged". There is no equivalent Policy quoted for site H3.3. and it is the view of Highways England that both should be subject to the same requirement.</p> <p>There are other sites in villages to the north and south of the A36 as it passes through Wiltshire. Though these sites are mostly small in nature, the cumulative impact would add to the traffic to the A36 and this impact on the operational performance is not known. For example, there are 200 dwellings proposed in the Warminster area. This will need consideration in development of the evidence base.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2513	Consultee Rachel Sandy Asset Manager South West	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Highways Agency Person ID: 903251		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Chippenham sites - impact on M4 junction 17 The Plan introduces three other allocations in the vicinity of M4 junction 17 which were not included in the Chippenham Site Allocations Plan. These are at Hullavington (50 dwellings), Yatton Keynell (30 dwellings), and Crudwell (50 dwellings). There is no transport evidence to show that these sites would or would not impact on the SRN.</p> <p>Transport Evidence Base Wiltshire Council is currently in the process of developing the transport evidence base to support the development set out in the DPD. However, until that work is complete, Highways England is unable to confirm the scale or cost of the necessary highway interventions, or whether all parts of the Strategic Road network likely to be impacted by the development included in the Plan have been identified.</p> <p>As recorded in the 'Consultation statement - Annex A: Report on the regulation 18 consultation June 2017' on the Plan, Highways England is committed to assisting Wiltshire Council with the production of a Transport Evidence Base. This may include the use of a number of Highways England transport models. These include a new VISSIM model of A36 between College Roundabout and Petersfinger, which, could be used to test the impact of the Netherhampton sites on A36 College roundabout and the already congested section to the east of that junction. Our current work on the A36 has two objectives, to understand what improvement options there are to help improve its current performance and operation, and to understand the impact of growth and how this might be safely accommodated.</p> <p>Highways England will continue to work with Wiltshire Council to determine whether the impact of any of these sites is likely to have a material impact.</p> <p>The work to assess infrastructure requirements for the Strategic Road Network is currently ongoing. This is being led by Wiltshire Council in consultation with Highways England. It is envisaged that infrastructure requirements will have been assessed by the time of the examination and Highways England will be willing to assist the inspector at that time to report on any residual implications for the Strategic Road network as may arise due to the Plan.</p> <p>What modifications are necessary? The need for any modifications to the plan will not be established until the transport evidence base has been completed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2514	Consultee Miss Caroline Hill Person ID: 1126401	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No evidence of housing need for Yatton Keynell The proposal for 30 houses on land east of Farrells Field has been put forward at County level in order to meet the County's strategic housing requirements for the Chippenham remainder area. The site allocation for 30 houses in Yatton Keynell is not based on any evidence that there is a specific local housing need in Yatton Keynell. Appendix E of the Chippenham Community Area topic paper, confirms that no local housing needs survey was undertaken as part of the draft Plan. The proposed dwellings should be justified with evidence that there is a specific local need and the plan should confirm how that need will be met.</p> <p>In light of the above the plan is unsound, it not justified and is not consistent with national policy set out in paragraph 158 of the NPPF which states: 'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'. Absence of a Neighbourhood Plan Of the five large villages within the Chippenham Community Area, Yatton Keynell is the only village without a Neighbourhood Plan. It is acknowledged that delivery of housing supply through a community led Neighbourhood Plan offers a positive and proactive approach to delivering housing need rather than a site selection process which is only put forward by landowners. The local Ward Councillor called for a Neighbourhood Plan to be made at a Parish Council meeting back in November 2014 (copy of minutes attached). This was suggested in response to specific concerns that were raised by the community in relation to the proposal for development of land adjacent to Farrells Field. The Parish Council have not addressed this request. Notes from the minutes to November 2014 (extract)</p> <p>'Cllr. Scott advised that Yatton Keynell should look into setting up a neighbourhood plan, which allows people in the village more of a say as to what they want in terms of any developments that may be proposed'. (extract) 'The proposed land is just outside the village boundary for Yatton Keynell, and unless the village see it a necessity the council favours objecting to the development'. (extract)</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states: 'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be engaged in a proactive way, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made. Site selection process unsound</p>				

	<p>Para 5.13 of the Chippenham Community Area Remainder Topic Paper – June 2017 states that the village of Sutton Benger which has an identified a housing need, was discounted as a village which could accommodate additional housing growth. The Plan states that the village primary school cannot accommodate growth and therefore the village cannot accommodate more housing. The exclusion of the village from the housing allocation plan seems unjustified as the plan should consider all housing types not just those for families. Just because the school is full that doesn't exclude new housing being delivered for elderly, and people without children (flats starter homes). If some additional housing was accepted in Sutton Benger it might reduce the overall need for housing which has been identified in the other larger villages where there is considered no housing need.</p> <p>The village of Yatton Keynell which has no evidence of identified housing need (this is minutes in Parish Council Meeting minutes November 2014), and no Neighbourhood plan has been identified for having a significant proportion of the 138 dwellings needed to meet the Chippenham Area Strategic housing target.</p> <p>The housing sites selection process is contrary to Para 159 of the NPPF. It states: 'Local planning authorities should have a clear understanding of housing needs in their area. They should: -prepare a strategic Housing Market Assessment to assess their full housing needs andThe Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which addresses the need for all types of housing, including affordable housing and the needs of different groups in the community such as but not limited to families with children, older people people with disabilities, service families and people wishing to build their own homes...'; Withdraw the land East of Farrells Field from the Draft Wiltshire Housing Allocation Plan and allow a Neighbourhood Plan to be prepared giving local residents an opportunity to explore other site options in a proactive way, in line with NPPF paragraph 155.</p>
Attached files (Please see Objective)	4730027
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am prepared to participate in an oral discussion on the unsound points if the Draft Wiltshire Housing Allocation Plan.

Comment ID:	2515	Consultee Miss Caroline Hill Person ID: 1126401	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Another factor which was not considered as part of the site selection was the landscape constraints in place for the village Yatton Keynell. A significant amount of Yatton Keynell settlement and adjoining land is washed over by AONB rendering a large area of land that is not available for development. This fact should have been identified as a constraint in the overall site selection process and taken into account when considering the amount of new development proposed in the village.</p> <p>30 dwelling will have a significant impact on the character of the area</p> <p>Para 5.31 identifies land East of Farrells Field, Yatton Keynell for the development of approximately 30 dwellings. The Council claim that ‘it is in a location that has the capacity to accommodate change from an environmental, heritage and landscape perspective, and could assimilate into the existing built form, whilst positively conserving and enhancing the village-edge setting’. However, a large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area.</p> <p>Change of Boundary to the Land East of Farrells Field</p> <p>Currently the Land East of Farrells Field is situated outside the village of Yatton Keynell boundary. If permission is granted for the future housing development the current boundary will be amended to include the new site, this will mean the small unique hamlets of Cold Harbour and Tiddlywink will lose their individual communities as the perimeters become linked up. This will change the feel of the entrance to the Cotswold Village of Yatton Keynell which is in an area of outstanding natural beauty.</p> <p>Withdraw the land East of Farrells Field from the Draft Wiltshire Housing Allocation Plan and allow a Neighbourhood Plan to be prepared giving local residents an opportunity to explore other site options in a proactive way, in line with NPPF paragraph 155.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am prepared to participate in an oral discussion on the unsound points if the Draft Wiltshire Housing Allocation Plan.				

Comment ID:	2516	Consultee Miss Caroline Hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1126401		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure issues</p> <p>Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area. These issues are identified in the site allocation supporting text, and the need for a capacity appraisal and further assessment is required. Infrastructure needs should be identified and established prior to the allocation of the site.</p> <p>Withdraw the land East of Farrells Field from the Draft Wiltshire Housing Allocation Plan and allow a Neighbourhood Plan to be prepared giving local residents an opportunity to explore other site options in a proactive way, in line with NPPF paragraph 155.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am prepared to participate in an oral discussion on the unsound points if the Draft Wiltshire Housing Allocation Plan.				

Comment ID:	2517	Consultee Miss Caroline Hill Person ID: 1126401	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Lack of community engagement and poor consultation</p> <p>The draft plan process is lengthy, complicated and difficult for the public to become engaged with. The planning process which has taken place and resulted in the Farrells Field site being put forward for housing, has not been meaningful, as it has not provided opportunity for the local community to comment on or consider alternative sites. The Parish Council have not engaged in the plan process or adequately represented the views of the local people in response to the proposal being put forward.</p> <p>I consider the proposed allocation for such a large site which will have such a significant impact on the community in yatton Keynell should be the subject of more meaningful consultation process by means of a Neighbourhood Plan.</p> <p>It is my understanding (from P61 of the Chippenham Community Area Remainder Topic Paper) that of the five large villages identified as part of the Chippenham remaining area, none of the Parish Council's responded to the Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement. It states in para 2.23:</p> <p>'Town and parish councils are the most local tier of democratic representation and, as such, they provide a key link with local communities. They are a specific consultation body under the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires that Wiltshire Council has to consult with specific consultation bodies which they consider may have an interest in the subject. Wiltshire Council is committed to continuing to consult with the local councils'.</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states:</p> <p>'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>Withdraw the land East of Farrells Field from the Draft Wiltshire Housing Allocation Plan and allow a Neighbourhood Plan to be prepared giving local residents an opportunity to explore other site options in a proactive way, in line with NPPF paragraph 155.</p> <p>I am prepared to participate in an oral discussion on the unsound points if the Draft Wiltshire Housing Allocation Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2518	Consultee Mike and Annie Smith Person ID: 1133304	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>1. We wish to submit comment on the Draft Wiltshire Housing Site Allocations Plan, which has been issued recently by Wiltshire Council for consultation; specifically that part concerning the proposed allocation of 50 dwellings to the Ridgeway Farm development in Crudwell. We believe that this allocation is unjustified and unnecessary; furthermore we believe that it is undeliverable, counter to the needs and expressed wishes and desires of the villagers of Crudwell, and prejudices the village's development of a more reasonable and sensible Neighbourhood Plan. Unjustified and Unnecessary</p> <p>2. Wiltshire's Core Strategy Policy document explains a housing requirement for 42,000 new dwellings across the county in the period 2006-2026, of which 24,740 are required in the North and North West Wilts Housing Market Area (HMA). The Plan details [Figure 11 of Appendix 1 to the Draft Wiltshire Housing Site Allocations Plan] the 12,603 completions that have been achieved in this HMA by March 2017 and identifies a further 11,566 commitments being achieved by 2026; for a total of 24,169. With an estimated additional "Windfall Allowance" of 2,086, the forecast total of 26,255 dwellings already greatly exceeds the established housing requirement in this North and North West Wilts HMA, by some 1,515.</p> <p>3. The Plan's proposed allocation of some 1,195 additional dwellings to this HMA simply increases the oversupply to some 2,710.</p> <p>4. Looking specifically at the Malmesbury Community Area (of which Crudwell is a part), the corresponding housing requirement [Figure 14 of Appendix 1 to the Draft Wiltshire Housing Site Allocations Plan] of 1,395 dwellings is already more than satisfied by the total of 1,495 for Completions (896) and Commitments (599); an oversupply of 100. This is before any allowance is made for "Windfalls".</p> <p>5. The Plan and Core Strategy states that housing sites will only be allocated to Villages where there is a strategic priority to do so. Given that the Plan identifies an existing forecast oversupply of housing in the North and North Wilts Housing Market Area (oversupply by 2,710) and in the Malmesbury Community Area (by 100), and given that there is no stated strategic priority otherwise, we argue that there is simply no justification for the allocation of additional housing in Crudwell.</p> <p>8. We are not anti-development. We would wish, however, that Crudwell be given the opportunity to plan itself for its future growth via an emerging Neighbourhood Plan; rather than have an unjustified and unnecessary allocation imposed on it, for a most unsuitable site.</p> <p>9. Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on genuine needs and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and in the meantime there should be no unnecessary allocation of one site for what is a very substantial and, we believe, disproportionate development.</p>			

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2519	Consultee Mike and Annie Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133304	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Unwanted</p> <p>6. The village of Crudwell currently has some 260 dwellings [NOMIS data as at 2011]. The proposed allocation of 50 additional dwellings represents an increase approaching some 20%. This increase is significantly greater than for most other villages in the County, and has not been justified by any housing needs surveys in the village, nor does it improve employment opportunities or services to the village. We are not against development in Crudwell, but we are very greatly concerned by the scale of this proposed allocation, its particular location and the likely adverse impact on the infrastructure of the village.</p> <p>8. We are not anti-development. We would wish, however, that Crudwell be given the opportunity to plan itself for its future growth via an emerging Neighbourhood Plan; rather than have an unjustified and unnecessary allocation imposed on it, for a most unsuitable site.</p> <p>9. Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on genuine needs and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and in the meantime there should be no unnecessary allocation of one site for what is a very substantial and, we believe, disproportionate development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2520	Consultee Mike and Annie Smith Person ID: 1133304	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Undeliverable 7. Careful examination of any proposals to build a further 40 houses on the Ridgeway Farm site (10 houses are already under construction, and we welcome these) will reveal significant local concerns about: Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following periods of sustained heavy downpours falling on already sodden ground. The surface water systems are already operating at maximum capacity. Unless significant additional investment is made in increasing the drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development. 8. We are not anti-development. We would wish, however, that Crudwell be given the opportunity to plan itself for its future growth via an emerging Neighbourhood Plan; rather than have an unjustified and unnecessary allocation imposed on it, for a most unsuitable site. 9. Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on genuine needs and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and in the meantime there should be no unnecessary allocation of one site for what is a very substantial and, we believe, disproportionate development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2521	Consultee Mike and Annie Smith Person ID: 1133304	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Undeliverable 7. Careful examination of any proposals to build a further 40 houses on the Ridgeway Farm site (10 houses are already under construction, and we welcome these) will reveal significant local concerns about: Crudwell Primary School is already greatly oversubscribed. Its classrooms, assembly hall and kitchens are already operating at maximum capacity. Forty additional homes will inevitably require the provision of at least one additional classroom, and unless the hall is extended, would prevent assembly of the whole school. The site is constrained; it lies in a conservation area, the building is listed and additional buildings could be accommodated only at the expense of encroaching into their playing fields. The school governors do not support further growth and have raised concerns about already over-crowded parking around the school. The school's ability to expand is not guaranteed. 8. We are not anti-development. We would wish, however, that Crudwell be given the opportunity to plan itself for its future growth via an emerging Neighbourhood Plan; rather than have an unjustified and unnecessary allocation imposed on it, for a most unsuitable site. 9. Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on genuine needs and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and in the meantime there should be no unnecessary allocation of one site for what is a very substantial and, we believe, disproportionate development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2522	Consultee Mike and Annie Smith Person ID: 1133304	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.13				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Undeliverable 7. Careful examination of any proposals to build a further 40 houses on the Ridgeway Farm site (10 houses are already under construction, and we welcome these) will reveal significant local concerns about: Increased traffic using Tetbury Lane. The proposed site is accessed from Tetbury Lane, which is a narrow country lane with few stretches of pavement (and few opportunities to put in a pavement), and is used by many heavy vehicles and wide farm vehicles. The prospect of increased traffic movements, combined with increased numbers of pedestrians accessing the school and other facilities in the village give rise to serious road safety concerns. 8. We are not anti-development. We would wish, however, that Crudwell be given the opportunity to plan itself for its future growth via an emerging Neighbourhood Plan; rather than have an unjustified and unnecessary allocation imposed on it, for a most unsuitable site. 9. Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on genuine needs and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and in the meantime there should be no unnecessary allocation of one site for what is a very substantial and, we believe, disproportionate development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2523	Consultee Sue and Grant Dunkley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133360		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We have lived in Crudwell for more than 30 years and would like to give our views on the proposed development of Ridgeway Farm, Tetbury Lane, Crudwell.</p> <p>Traffic Tetbury Lane between the new site and the A429 has restricted width in several places, even cars cannot pass safely. When articulated lorries use this route it is impossible to pass. The road from the site towards Long Newton is even worse. The view from the junction of Tetbury Lane and the A429 turning towards Malmesbury has a very restricted view due to parked in the adjacent layby. There will no doubt be an accident on these two roads. There will also be increase noise and pollution.</p> <p>The main road which is the main route to the school is busy with vehicles usually travelling above the speed limit and the footpath near the school is very narrow. This encourages (rightly so for safety of children) to drive to the school, resulting in severe congestion around the school. Additionally children going to the school will make the situation worse.</p> <p>There are no employment vacancies in the village so where are the additional residents going to work? Obviously not in the village this will increase traffic and have an impact as described in points (Traffic, School).</p> <p>Public Transport As with many other villages in Wiltshire the public transport service is minimal and inadequate for residents looking for work/shopping in local towns.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2524	Consultee Mr R Clarke	Agent Jeremy Flawn Bluestone Planning	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 836764	Person ID: 836762	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Legal Compliance and Soundness</p> <p>Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment and the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) require the consideration of 'Reasonable Alternatives' in determining which sites to allocate in a Plan.</p> <p>In this case land to the south of Westbury Leigh (see enclosed Land Registry plans) is demonstrably a reasonable alternative to those considered by the Council and should have been allocated. This omission means that the Plan is legally non-compliant and it is not sound because it is not the most appropriate strategy when considered against reasonable alternatives.</p> <p>To remedy this significant flaw in the process, the Council must re-consider its approach to meeting the needs of the Westbury Community Area, including the assessment of land south of Westbury Leigh as a reasonable alternative to the options already identified and assessed. The consideration of this land should result in the allocation of this site for residential development, because it is consistent with the Council's settlement hierarchy (which identifies Westbury as a Market Town) and consistent with the principles of sustainable development.</p> <p>In addition to the above concerns, the Plan is also considered to be unsound because it fails to properly consider the most sustainable approach to meeting the objectively assessed needs of the Westbury Community Area (CA). In seeking to allocate only one residential site on the edge of a Large Village, the Plan is failing to provide for sufficient capacity at the main Market Town in the CA, thus undermining the delivery of the Plan's strategy and putting at risk the proposals to meet the Planning Authority's and the CA's objectively assessed needs.</p> <p>In order to remedy this failing, the Plan should provide for the allocation of additional sites, to ensure that the Plan is based upon a strategy that is capable of meeting objectively assessed needs of the Plan area and the CA of Westbury. Land to the south of Westbury Leigh should be allocated as a housing allocation in order to assist in meeting the objectively assessed needs.</p> <p>Land to the south of Westbury Leigh is available, deliverable, benefits from an enclosed landscape setting and lies immediately adjacent to the urban area (see enclosed plans). It is a defensible site which can be assimilated well into the edge of the settlement with appropriate landscaping. Access to the site is via Westbury Leigh, and although there is a slope across the site it is not considered to be a constraint to development. Part of the site is also proposed to be included within the settlement boundary following the granting of planning permission for residential development (in the north east part of land parcel WT219265).</p>				
Attached files (Please see Objective)	4730233 / 4730234				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to test the evidence provided by the Planning Authority.				

Comment ID:	2525	Consultee Ms Nicola Morris Person ID: 1122130	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.59		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Please find enclosed my Pre-submission Representation Form duly completed with the particulars set out on Continuation sheets and with supporting documents and photographs attached. I was unable to email the whole document because of the attachments and therefore deliver the letter direct to the Spatial Planning Team within the deadline of 5pm 22nd September.</p> <p>This is made on my own behalf and not in my capacity as a Parish Councillor in Bratton and Vice Chair. It is made by me and my 3 adult children named on the Form. If my late husband James Ward were alive he would join in also, I mention this as he too would be most upset to be involved in this process of proving that what we had spent 18 years together (to 2012) hands-on building and renovating Grange Farm including the garden now has the garden designated "open countryside" for "up to date" Settlement Boundary purposes, wholly ignoring the development and changes which have taken place years before and the circumstances on the ground and the other factors set out in the enclosed. What is an administrative process to Wiltshire Council has an unforeseen consequence on me, as my husband cannot enjoy the house or "garden" as he was shot in Devizes in July 2012, and died 3 weeks later, and thus preparing this paper is too close to the bone. I do appreciate that this has no bearing on the process. I am also very grateful for the help which the Spatial planning officers have given me in relation to the process.</p> <p>Representation on the Wiltshire Housing Site Allocations Plan Pre-submission Document.. (Continuation sheets) Policy: 1.1of the PLAN. (Settlement boundary review). Paragraph: 3 of the Westbury Community Area Topic Paper, Settlement Boundary Review, page 6, and Table: Appendix A.2 Bratton plan on page 24 and explanations on page 23 of Proposed Amendments to Bratton Settlement Boundary Figure: n/a Site: n/a Other: n/a</p> <p>This representation is made by Nicola Morris of Grange Farm, 61 Lower Road, Bratton Westbury BA13 4RQ and supported by Louise Morris, Alexander Morris and Pippa Morris.</p> <p>This representation relates to the Settlement Boundary Review of the Plan. The Representation relates to the changes made to the Settlement Boundaries which affect my property because it is located at the northern boundary of Bratton village.</p> <p>My Case/Representation: The Boundary Settlement lines on the Pre-submission Draft Settlement Boundary Plan for Bratton have been reviewed and revised at Grange Farm but NOT in accordance with the Objects, policies and the methodology of the Plan nor of the WCS but in breach of these and the changes are opposed. The proposed alternative is set out and shown on Plan 1 The Wiltshire Core Strategy is referred to as "WCS". The Wiltshire Housing Site Allocations Plan is referred to as "the Plan". The Settlement Boundary Review Methodology, Topic Paper 1is referred to as "Topic Paper 1".</p>				

"Plan 1" is the enclosed Plan marked Plan 1, large scaled map of the north west section of Bratton.

The Red Line means the line of the proposed settlement boundary proposed by Wiltshire Council in the Draft Plan, marked in red on Plan 1.

The Blue Line is the line of the development boundary set previously by the West Wiltshire District Plan and under review, marked in blue on Plan 1.

The Green Line (marked on Plan 1) is the proposed Line which I claim should be set as the line of the Settlement Boundary at Grange Farm.

NOTE: The Bratton Plan & explanation page for the Settlement Review of boundaries is contained in the Westbury Community Area Topic Paper, Appendix A, at Table A.2 on pages 23 and 24.

The Policies, paragraphs and other details are set out in this representation clearly throughout the representation and are set out at the end section.

Particulars of incorrect proposal of boundary changes:

Table A.2 BRATTON in the Appendix of the Westbury Community Topic Paper. Map Grid Reference: G5

Description: "Amend boundaryand to remove area of land more closely related to the open countryside".

An inspection of this plan shows that the Red Line for the Draft proposed new boundary at Grange Farm has been brought in towards (that is reduced) to remove an area of established garden adjacent to a residential dwelling and to follow the features of walls within the Property which are not walls for boundary purposes but garden features.

The Red Line has not been moved to the established physical boundary of the curtilage and the fence /hedge line in line with the physical features of the Property and in line with the Draft Plan northern Settlement Boundary of the Village at its northern boundary.

This representation and objection requires the Pre-submission Draft Plan for Bratton to be reviewed so that

The Settlement Boundary at the property is revised and extended (enlarged) to the existing physical northern garden boundary established in 1995 shown by the Green Line on Plan 1.

Where the above is not accepted, the Settlement Boundary at the property must be drawn to adequately and properly reflect the changes and circumstances on the ground and the establishment of the garden commenced in 1995 and established by 1999so that it is not necessary to make a change to the Settlement Boundary line at the Property and the Blue Line should remain and the Draft Plan's Red Line should be deleted, and

In all cases the proposed Draft Red Line sets an impermanent and unacceptable new Settlement Boundary for Bratton at this property, is in breach of the WCS, the Plan and the methodology of setting Settlement Boundaries and should not apply.

The correct categorisation should be: "The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in the terms of the scale and location".

The "area of land" referred to at Map Grid Reference G5 on Table A.2 is a part of the garden, the central area of lawn, hedge, flower beds and rose garden of my property. The Property is Grange Farm, 61 Lower Road, Bratton, Westbury BA13 4RQ. This is a single residential house, previously a farmhouse until the purchase with my late husband James Ward on 21 December 1994. It is a Grade II Listed Building. The house dates from the 16th century and was gentrified in 1739 by the addition of its Georgian facade.

At the end of this representation I have set out the sections of policies which are relevant and apply to the Settlement Boundary review process from the WCS and Topic Paper 1., and other relevant documents of Wiltshire Council.

Grounds for representation: Not sound.

Looking at the Representation guidance for representations, the proposed changes to the Settlement boundary is not sound. To be sound:-

The Plan must be sound, meaning it must be positively prepared, ie based on a strategy which seeks to meet objectively assessed development & infrastructure requirements; it must be justified ie: it should be the most appropriate strategy, (when considered against the reasonable alternatives, based on proportionate evidence); it must be effective ie deliverable over its period, and it must be consistent with national policy. A critical part of the effectiveness and deliverability of the housing and housing numbers in Wiltshire under the WCS and through the Plan is (where necessary) the reviewing, revising, placing and siting of each boundary line of each settlement and, it follows, the correct interpretation of policy and methodology and the correct executing of the methodology for reviewing, revising and amending the boundary lines shown on the Policies Maps. Errors and breaches over the policy and methodology in relation to the boundary lines mean the Plan is not sound.

In support of my case I attach:

1(A). Plan marked "PLAN 1": A large scale map provided by the Council for this purpose of the immediate area with the existing blue line of the development boundary as presently fixed under the West Wiltshire District Council plan marked in blue, (the Blue Line) the proposed Draft Plan new Settlement Boundary red line marked in red (the Red Line) and the curtilage line of the property for the revised Settlement Boundary set out in this objection marked by a green line (the Green Line)

1(B). AERIAL PHOTOGRAPH to supplement Plan 1 showing the Red Line, the Blue Line and the Green Line, photo taken from South towards the North, Grange Farm to left and Yew Tree House to right, agricultural field to the North.

2. "Planning Permission" Plan from the planning permission W95/0562 granted on 17 April 1996 for the change of use of the whole curtilage of the property from agricultural use to domestic curtilage and new vehicle access on to the Trowbridge road
3. 2 Land registry plans showing the full extent of the curtilage of Grange Farm, house purchased 21 December 1994 and access land purchased 5 April 1995.
4. Aerial photograph of Grange Farm in its setting taken April 1966.
5. 5 x O.S. Maps dated 1887, 1901, 1924, 1978-79 and 1924 to show extent of the built up farm buildings.
6. Layout Plan of 18.07.1991 of the Planning Permission of adjacent Grange Court ref W93/0992 (site of the two houses subsequently altered and access through to Grange Farm removed.
7. Site Plan of Grange Court development of 1993 to show the built up extent of agricultural buildings to rear of House and proposed access way and parking for Grange farm House to east side.
8. Photographs itemised on attached list.

Explanation provided in Table A.2 for the change and review:
The explanation for the removal of this part of the garden in Table A.2 is given as: "Amend boundaryand to remove area of land more closely related to the open countryside".

FIRST OBJECTION

Incorrect categorisation to the area as it is a garden not open countryside.

This categorisation of open countryside is clearly wrong. The area is not open countryside but a garden. The reviewing process by the Council has failed to note the establishment of a garden, established under a planning permission for change of use. The changes were made between 1995 and 1999 with the garden in its present form by 1999, some 18 years ago. This is beyond any doubt a garden and one which must be included within the Settlement Boundary. There must have been a failure by the council to note the changes which have happened and the circumstances on the ground have excluded the garden as an area of land more closely related to the countryside. The methodology has not been applied properly or consistently. Referring to the policy to establish this objection:

Topic Paper 1 clearly sets out the policy for gardens which are to be included within the Settlement Boundaries:

"Areas which have been included are:

"The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in the terms of the scale and location".

Further:

Areas excluded are:

" the extended curtilage of a property that relates more closely to the open countryside (e.g a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location".

2 Grange Court, (1994 house to the west of the garden) and the adjacent 1 Grange Court (1995 house built to the rear and west side of Grange Farm) have gardens abutting this garden and windows overlooking the garden. They do not overlook the open countryside, which is clearly the field to the north. Nor do they overlook a field or paddock. They overlook our lawn and garden.

In particular, included in the same Map Grid reference " box" on Table A.2 for Bratton is the entry for Yew Tree House situated in HS adjacent to Grange Farm in GS. This Georgian House has a large garden which abuts the garden of Grange Farm on its western boundary at one point and is separated by a ditch and some trees (Grange Farm's eastern boundary). The entire garden of Yew Tree House is included in the Draft Plan right up to the northern boundary of its garden in line with the main field boundary, whereas before the West Wiltshire District Council

line ran very close to the rear of the house. The explanation given for the proposed amendment is "amend boundary to include the curtilages of the properties that relate more closely to the built environment". This is a very large garden and certainly one which should be included as a whole. It is larger than the garden of Grange Farm which has been developed in the "rump" of the farmyards and housing development over time.

CONSISTENCY:

The entire garden of Yew Tree House has been included as a curtilage of a property that relates closely to the built environment. The policy must be interpreted consistently county-wide.

The Plan paragraph 2.11, stipulates:

"2.11 An objective of the Plan is therefore to review and update existing settlement boundaries to ensure they are up-to-date and accurately reflect circumstances on the ground, derived on a consistent county-wide basis...."

On this policy and methodology the entire garden of Grange Farm should be included as a whole within the settlement boundary, as shown by the GREEN LINE on Plan 1 on the basis:

"to include the curtilage of a property that relates more closely to the built environment"

In addition this enlargement will mean that together with the extension /inclusions of the garden of Yew Tree House and the gardens of the other houses and bungalows along Lower Road right up to the northern field boundary of the village there will be conformity for the village's northern boundary and the village setting.

These points also apply through the Second and Third Objection below dealing with the "built form" or "built environment".

SECOND OBJECTION to the new proposed settlement boundary in the Draft Plan (The Red Line on Plan 1) and removal of part of the garden - The new physical boundary chosen (the Red Line) is in breach of policy and correct methodology.

Topic Paper 1 states that first and foremost

"The settlement boundaries define the built form of the settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses."

Under Paragraph 1.1 of the Plan, Settlement Boundaries must only be revised "where necessary". It must be the case that on the Review the Blue Line was found wanting as it does not follow a physical boundary on the ground at all points. If this was not found to be necessary the Blue Line should remain unchanged.

The boundary has been moved to the Red Line and I contest the boundary Red Line chosen by the Council.

Please see Photographs showing the effect of the new Red Line in the area at the back of the house in particular the patio and to the eastern side of the house adjacent to 59 Lower Road.

To define the built form the RED LINE boundary has not been moved outwards to the 1995 physical boundary and curtilage of the property, which is the fence and hedge line.

Rather, to define the built form, ("where practicable"), the RED LINE boundary has been

brought in by utilising the more recently constructed hard physical landscaping structures in the garden by the back of the house, in particular of the flower beds and patio which we laid out and its low dwarf walls which we built and were in place by 1997/8.

These dwarf walls are not permanent features and can be moved or removed at any time. They provide no certainty for the future. They are internal decorations. It cannot be in accordance with the Plan that when referring to clearly defined physical boundaries such as "walls", the Council means these dwarf patio walls. They are not an acceptable physical feature for the Council to be using as a "planning tool" for where development will take place.

In the Plan Paragraph 2.11 it states that: "In simple terms, they are the dividing line, or boundary between areas of built/ urban development (the settlement) and non- urban or rural development - the countryside." Clearly this is not the case here. On one side there are herbs and flowers and on the other side of the dwarf wall there are roses and flowers. Both sides are built settlement.

Under the policy, the physical feature itself is not within the settlement and so to follow it to the logical conclusion, the small herb bed within the dwarf wall will be within the Settlement Boundary of Bratton, but the dwarf wall itself will not be.

THIRD OBJECTION to the new Red Line boundary and the removal of the Garden: The Red Line breaches the policy as the area to the north of the Red Line, Map Grid

Reference GS is within the extent of the built settlement/ built environment/built form and is not the countryside.

Grange Farm, its farmhouse and farm yards (previously known as Bratton Farm) and its buildings and barns to the left (west), rear (north) and right hand side (east) and immediate yards and orchards are one of the oldest and earliest areas of settlement and development in Bratton. For hundreds of years the farmhouse was the settlement.

The proposed Red Line would mean that Grange Farm will have a built form, a rear garden which is part of the built environment to a distance of no more than 8.2 metres from its back wall and back door before it comes to a point designated by the Council as the "open countryside".

The new Red Line boundary will mean that the built form at the back of the house is:

- *A minimal area between the most western stretch of the back wall (4 storeys high from its cellar door) of the house and the side wall of the immediate garage of 2 Grange Court; and
- *An area of patio which is 8.2 metres from the back door and back wall of the house.
- *nothing else.

As for the eastern side of the house, the settlement boundary excludes the small lawn and rose garden, and the wall used for the boundary at this point is not even at a point beyond the back wall of the house, but within it. It is 1.4 metres from the north east corner of the house corner, and to emphasise, the garden paths, flower beds and lawn are excluded from the settlement and the countryside is 1.4 metres from the side wall of the house. The physical brick wall separating Grange Farm and 59 Lower Road relevant to this part of the garden is not used to include this portion of the garden, although it was used by the West Wiltshire District Council for the Blue Line and it is now used by the Council as the physical boundary for 59 Lower Road to extend that neighbouring garden of 59 Lower Road northwards (to include its whole curtilage) to the shared back boundary.

This type of fixing of a boundary was one of the ones heavily criticized during the consultation process.

As already set out above, at Yew Tree House the opposite methodology has been used. The whole garden has been included within the settlement boundary. This inconsistency means the methodology used for Grange Farm is so flawed as to be invalid.

The Built Form of Grange Farm:

The farmhouse area was and remains built up, previously as a farm now as a garden.

The old plans, the 1966 Photograph and the Site Plan and Development Plan of Grange Court enclosed show the density of the site, the large size and the location of the numerous buildings and yards across this corner of the village. These crossed to the rear of the farm house with some to the east. The concrete and other hardstanding passed over the whole main area to the rear of the house linking up the yards and buildings on the east side.

The old plans show that the buildings of the farm extended to the east of the present boundary with Grange Court, that is to an area directly north and to the east. In 1994 the small breeze block building on the corner with 59 Lower Road still stood.

Grange Court (2 houses, garages and gardens) passes across almost one half of the house at the back the garden and impinges on the space.

The large scale Site Plan enclosed of the Grange Court development shows the location of the barns across the rear site.

In 1994 on our purchase the rear yard to the north of Grange Farm house was made of hard standing with several buildings and foundations of buildings remaining.

This changed after we bought the property in December 1994.

Planning Permission: Reference W95/0562

Planning Permission was granted and commenced on 17 April 1996 for change of use from agricultural land to domestic curtilage and a new vehicle access off Trowbridge Road, for the whole curtilage of the property, including the house and front garden and front outbuilding.

Please see the Permission Plan showing the curtilage edged in red. The post and rail boundary fence on the northern boundary is shown clearly marked on this plan as already in place. (Installed April 1995)

The garden is very much a constructed garden, with hard landscaping of patio and low dwarf walls at the back and a side garden with wall and steps at the side. It is a built environment with 400 tons of hardcore and building material removed and the same weight of soil brought in, with levelling and planting, so that the garden is formal by the house and more countrified at its edges. This is intentional. The garden has been a garden with formal lawn since 1998-1999, over 18 years.

The removal of agricultural buildings from farm yard sites and yards does not result in the land changing to open countryside. The result was a cleared site covered with hard surfacing and foundations, as an agricultural "brown field" site. The subsequent removal of the hard surfacing does not result in open countryside. Building of a garden does not result in the construction of buildings but the change of use to a garden is just as much a change and development. The methodology only refers to the built form, and not to actual buildings built. Indeed, Paragraph 4.13 of WCS states that the boundaries must be reviewed so that they are "up to date and adequately reflect changes which have happened since they were first established." This includes the construction of gardens.

The change has been made from land in agricultural use to land used as domestic curtilage and residential use as garden and the changes come within the policy and the Settlement Boundary should be reviewed to include the changes.

Please see photographs enclosed.

Summary: the built form of Grange Farm far exceeds the area designated by the Red Line. The Red Line breaches the objects of the Plan and its policy and has been reviewed in breach of its methodology and should be cancelled.

FOURTH OBJECTION

Relating to the removal of the area breaches the Plan and the extension to the established physical field boundary is in accordance with policy of the Plan.

For the Policy and methodology: See paragraph 8 of Topic Paper 1, page 23, Table 8.1 stipulates (as mentioned above)

"The settlement boundaries define the built form of the settlement by, where practicable, following but not including clearly defined physical features, such as walls, fences, hedgerows, roads and water courses."

The Property has had just such a defined physical boundary since April 1995 for over 22 years, providing clarity between the agricultural field and agricultural use to the north and to the south the domestic garden use of the Property and its vehicular accessway. The stock-proof wooden fence was erected along the most northern boundary being the GREEN LINE on PLAN 1 in April 1995, followed by the partial planting of a mixed native hedge along the inner length of the fence. This is just the type of physical boundary to which Paragraph 2.11 of the Plan relates, that is

: "in simple terms, [the boundary lines] are the dividing line, or boundary between areas of built/urban development (the settlement) and non-urban or rural development - the countryside."

FIFTH OBJECTION.

Relating to the grant and commencement of Planning Permissions of the whole curtilage.

Referring to the list as above in Topic Paper 1.

(b)"Areas which have been included are:

"Built and commenced developmentthat is physically related to the settlement." Topic Paper 1 in paragraph 7.14 states: "..... for those planning permissions where development has commenced, there is a much greater certainty over the final built form of the development.

Therefore, the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions."

As stated above, planning permission has been granted and commenced. It was granted on 17 April 1996 for change of use from agricultural land to domestic curtilage and the construction of a new vehicle access from Trowbridge Road, reference W95/0562. This is for the whole curtilage of the property as shown edged red on the Planning Permission plan. There is no time limit condition in the permission, it applies until another permission should take its place. The whole area has been used as domestic garden land, the garden of the house.

The access way is physically located to the settlement. It is attached to the property and it is not isolated or separated. It immediately abuts and wraps the northern boundary of the house and garden of 1Grange Court which is part of the original built form of the Grange Farm settlement. Visually the access way at the rear may seem disjointed, but historically the house has always had access to Trowbridge and the methodology sets out that the visual nature is to be disregarded and it is the physical test that must apply.

The driveway/access way at the rear has been used regularly and often intensively during a period of approximately 12 years (1995 to 2007) with heavy machinery, lorries, JCBs, skips and vehicles whilst the house was restored, renovated and extended, and the garden was constructed and developed, and since then has been used as the only vehicular access way and place for off road parking and the keeping of

significant numbers of old bricks, tiles and other building materials (in keeping with an old property and buildings in a rural setting) for our intended construction of out buildings for garages, lawn mowers, log stores, and potting shed on the garden.

SIXTH OBJECTION

If Grange Farm curtilage cannot be included up to the Green line boundary in the same manner as Yew Tree House under the category of "the curtilage of a property that relates more to closely to the built environment (e.g. a garden)" then the alternative in this particular category should be applied to Grange Farm,

In other words:

"OR has limited capacity to extend the built form of the settlement in the terms of the scale and location".

I have already dealt with this category above in relation to the garden area which has been removed from the settlement boundary by the moving in of the Red Line.

Enlarging the Settlement Boundaries to take in the curtilage of the property affects all parts of the land north of the Blue Line. The objections and the reasons in favour of the property being included as set out above also apply to the remaining part of the curtilage of the property and are repeated here.

(that is the up to date circumstances of the land, the changes to the land, the built up form, the planning permission, the defined physical boundary).

The area of garden to the east is set out with fruit trees and is what remains of the orchards that once covered large parts of the farm land, and indeed Bratton. This land is not open countryside. It is not a large area in terms of the countryside. It is not a field or a paddock or anything resembling a field or paddock. It is physically attached to the main garden and only set to the side because of the development of residential properties at 57 and 59 Lower Road, including the demolition of the timber framed house and northern section of the cow shed on Lower Road. It is a well defined part of the garden, opening off directly from the lawn with views through to Yew Tree House garden. It is nor screened or divided off. It has proper boundaries, firstly with the boundary hedge to the north, ditch and trees to the east and the hedge and hedge/fence to the south with 59 and 57 Lower Road.

The extension of the boundary at this point will bring the northern boundary up to the field boundary in the same way as the rest of the properties in Lower Road and thus will be limited in scale and location.

SEVENTH OBJECTION:

Consistency.

The Plan paragraph 2.11, makes it clear that the policy of setting settlement boundaries must be consistent on a county-wide.

"2.11An objective of the Plan is therefore to review and update existing settlement boundaries to ensure they are up-to-date and accurately reflect circumstances on the ground, derived on a consistent county- wide basis...."

This has not been the case with the imposition of the Red Line at Grange Farm. At Grange Farm, not only has the Red Line been brought in to remove an area of garden, but the boundary has not been extended as has been done in other areas where the same or very similar reasons apply. I have considered revisions in the local area and have noted the following properties at the edge of settlements immediately nearby or in the local area.

Yew Tree House:

The nearest property is the garden of Yew Tree House, Lower Road, Bratton, shown in Map Grid Reference HS. Here the very opposite change has been made to that at Grange Farm. The objections made in Objection 1 above are repeated here and I add the following. Yew Tree House has a large garden with a large open lawn area. There is direct access from the garden

direct to Lower Road. Its garden area far exceeds the area of garden which has been "removed" from Grange Farm in GS. It is more homogenous than Grange Farm in shape as it has not been developed for housing in the same way as Grange Farm.

It is clearly a garden.

The garden of Yew Tree House has not always been this open and had previously been divided up with different uses as shown by the earlier enclosed maps. Up until the 0.5. Map of 1978 the western section of the present lawn is shown as separate orchard.

It does have limited capacity to extend the built form of the settlement as the area extended is large.

It could be argued that there is space for small development in the garden if required and so as to not impact on the Listed house. In Table A.2 page 24 the explanation in Map grid reference HS for the change and enlargement of the boundary is "amend boundary to include the curtilages of properties that relate more closely to the built environment". This expansive scale for the extent of the "built environment" has not been applied in the same way for Grange Farm. With Grange Farm, rather than a large expansion and inclusion, there has been a large exclusion and removal. The inconsistency is all the more marked for the properties being so similar in size and so close together.

Westbury Leigh Property.

Another similar large house and garden in the local area is shown at Westbury, (Westbury Community Topic Area) at Map Grid Reference F14, F15 of Table A.1 of Westbury. This is a large Victorian house with garden and access to the road in Westbury Leigh and to a rear lane. The property is at the edge of the settlement on two sides. This property previously was not included within the limits of development of the West Wiltshire District Plan at all, but has been included as a whole. At the Consultation stage of town & parish councils, recorded in the Statement on the Informal Consultation, at page 613 in the Westbury section, a "specific comment" is registered that "It would appear logical that the boundary line be moved to include the whole of their site which is currently shown as garden", and the officer commented "Accept. Include garden physically related to the settlement within the boundary".

In the Table A.1 for Westbury, it has been included as a proposed amendment as "to include the curtilage of a property that relates more to the built environment (e.g. a garden) and/or has a limited capacity to extend the built form of the environment."

It does extend the settlement boundary considerably. It is a garden.

It can be argued there is space and access for housing.

Clearly the area of that property is judged by the Council to either be a garden or have a "limited" capacity to extend the built form.

Bratton:

In Bratton, at Map grid reference 18 on the Bratton Plan, the settlement boundary has been extended so that two properties which previously had gardens which were partly excluded have now been included, with a road which would enable development potentially.

Clearly, the Council will expand areas which will then bring in development potential.

Also, properties shown in 18 and H8 have been extended to include "built residential development that is physically related to the settlement" and these provide some space which could potentially allow development.

In Semington in the Melksham Community Area Table A.4 the boundary at the property in Map Grid reference JS has been extended to accommodate a drive with the same explanation as the property above (save for "to extend the built form of the settlement" rather than the word "environment"). That property has direct access to the public road and the extension provides additional space and access. This could potentially be used for small development.

At Shaw and Whitley, in the Melksham Community Area again, larger garden boundaries have been extended at Table A.5 Map Grid reference 18 (two gardens) under the same category as the above and this opens up potential small development in the rear gardens.

In general terms almost all the boundaries at Bratton apart from at Grange Farm and a small part at Yew Tree Farm have been extended outwards to the main line of the outer boundaries, field hedges or similar, taking in the numerous properties which previously were not included as part of the settlement and within the limits of development. It is inconsistent not to enlarge the area at Grange Farm in keeping with this change.

In terms of the size of the area, the location of the property and the proposed enlarged village boundary this inclusion at Grange Farm would be no more than limited capacity to extend the built form.

and forms a homogenous circular village, particularly with the enlargement of the neighbouring Yew Tree House.

The policies in the Plan specifically allow the inclusion of areas where the curtilage of the property relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location."

The policy and methodology does however exclude the extended curtilage of a property that relates more closely to the open countryside (e.g a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location".

Throughout the Plan area, the plans reveal many properties have been extended where there may be a limited capacity to extend the built form of the settlement in terms of scale and location.

Extending the settlement boundary of Grange Farm to include the whole curtilage up to the physical field fence and hedge extends the area of Bratton settlement boundary by an amount

Similar in size to the area of extension of Yew Tree House and up to the same northern boundary and similar in size to the large garden areas made available in Map grid reference H8 and 18.

The above inclusions have been put in the Draft Plan and therefore I conclude they must be acceptable in size. A consistent approach should include the Grange Farm land.

This is particularly relevant to the location as Grange Farm and Yew Tree Farm abut each other at the Settlement Boundary line. Extending the settlement boundary at Grange Farm will mean that the northern boundary of the village is almost uniform, running in a clear line from west to east. The northern boundary fence and hedge of Grange Farm almost meet at the corner with Yew Tree House. Beyond that to the east, the Plan proposes the extension of all the garden boundaries up to the point of the tennis court. This forms a tightly formed village with the northern houses closely knit at the base of the incline on Lower Road.

This is in keeping with the scale and location.

As for the western accessway of Grange Farm, this is the accessway to on to Trowbridge Road. The accessway area is immediately adjacent to the house and garage of the new property (1995) 1, Grange Court. This physical boundary of the settlement was fixed in 1995 and the change of the settlement boundary will not make any change here. The scale of the extension at this point is narrow and not harmful.

Impact on the road and other properties at Trowbridge Road, western side : at this point the village extends further north on the other side of the road by the width of the three properties built from the 1980s up to 1996 which go up to/ impinge on the site of the medieval village remains.

There has been one recent infill built to the south of these three, making 4 in all above the converted barn and Court House. As such the western side of Trowbridge Road has already been extended considerably since the 1980s to beyond the point of the accessway. There are 4 driveways on the western side for the 4 houses. The accessway of Grange Farm has been in place since 1995 and is a part of the up to date circumstances on the ground, and the change to the designation of the settlement boundary will not affect the location. The settlement boundaries at the rear of these properties to the west have all been extended to include large sections of the gardens up to the field boundaries. Only the northern most boundary has been reduced to exclude the medieval village site.

What is clear is that the WCS and the Plan envisage that development will take place beyond the settlement boundaries and that these will grow as determined by the Plan and WCS. At paragraph 3.4 of Topic Paper 3 Settlement Strategy, working towards a core strategy for Wiltshire, in relation to settlement boundaries it states: "At all other settlements [other than small villages] where existing boundaries are to be retained they serve as a useful point of reference as development is expected to take place beyond the current boundary. Where these are reviewed by a subsequent DPD or neighbourhood plan it is expected that the review would then provide for the development beyond the current settlement and the new boundary would again form the limit of development".

Boundaries being extended is part of the process of reviewing settlements, some will be enlarged and some may include an area for small housing. Although the process of reviewing boundaries is a planning tool it is not in itself a means of preventing development as each boundary has to be fixed according to the methodology.

Extending the boundary at Grange Farm is in keeping with policy and is consistent with enlargements within the County.

One of the characteristics of Bratton is its tight, close knit form, very different from many villages in the area with long ribbon development.

Expanding the settlement boundary at Grange Farm up to the northern physical boundary would be in keeping with this characteristic and would not be more than limited capacity and it is a limited capacity which would be in keeping with the scale and its location.

The Red Line boundary and to a lesser extent the Blue Line are wholly out of keeping with the built form of Grange Farm and the form of the village settlement.

Neighbourhood Plans:

Councils can subsequently alter boundaries through neighbourhood plans, so long as this is in accordance with the WCS. Wiltshire Council through its development plans can allocate housing outside the limits of development (which will subsequently be taken in to the boundaries) and also enable development by using the settlement boundary as a planning tool. At the present stage of the process it is for Wiltshire Council to review comprehensively and settle the settlement boundaries in Bratton as it is the first purpose set out in paragraph 1.1 of the Plan and the first Objective set out in paragraph 3.2 of the Plan, and this should not be left to a subsequent review.

Summary:

1. The northern boundary of the Settlement Boundary at Grange Farm should not be changed to the Red Line shown on Plan 1, nor remain unchanged as per the Blue Line shown on the Bratton plan,

but should be extended to the existing northern boundary fence and hedge of the Property as per the Green Line shown on Plan 1 and the property changes should be designated on Table A.2 as "The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in the terms of the scale and location".

Other issues.

The Methodology.

For best practice, the council reviewed how Winchester City Council, Purbeck District Council and Kettering Borough Council carried out their reviews, recorded in Topic Paper 1. Yet despite this as set out in Topic Paper 1 Wiltshire Council has undertaken a desktop review using GIS data sets with aerial imagery and Ordnance Survey maps. They considered consultation responses. At paragraph 8.4 the Council "recognize that a desktop review alone may not necessarily take into account the detail and most recent changes on the ground. Therefore, following the desktop assessment planning officers with relevant knowledge were consulted on the maps produced for each settlement....feedback from planning officers was then taken in....." This seems very late in the process and accepts that reliance on GIS alone is flawed.

Winchester undertook site visits and local consultation in addition to GIS mapping, aerial photography and information from planning permissions. Purbeck carried out public consultations and meetings with town and parish councils. Kettering carried out site visits and consultation with parish councils in addition to desk top review using GIS mapping and aerial photography. All went further than Wiltshire Council.

The OS map for the Bratton area (shown on the SHLAA plan for site 321 in Bratton) is inaccurate for the purpose of the settlement review. It does not reveal the actual house at Grange Farm with any clarity, giving the impression that the rear garden is not attached to the particular property and thus it loses its "anchor" so that a garden becomes an extension of a field. I have checked the OS map on the standard Wiltshire Council on line site, and in the area of my property and at the location of Site 321 (mentioned below) it reveals the OS map as per the 1982-89 plan enclosed. Grange Farm is not clearly shown, and is difficult to make out, and the buildings which are shown do not record the buildings which exist. This is the same for the buildings on 57 and 59 Lower Road which are not accurately sited. Indeed it does not reveal the property immediately abutting Site 321 for 40 houses allocated in the Plan at Bratton, namely the Old Police House, Westbury Road. (The information on the main specific sites (e.g. Planning permission sites) do show the larger up to date accurate specific information)

From the enclosed maps, it can be seen that the OS map of 1978-79 is particularly clear, but the OS map of 1982 through to 1989 is flawed. GIS mapping information is only as good as the information which has been loaded on to the particular system used and in a large unmapped rural area such as Wiltshire it may not suffice for particular properties. Satellite information varies depending upon the date of mapping and may not be a reliable tool, certainly not in Wiltshire in terms of complying with the methodology of ensuring that the boundaries are "up to date". The Council acknowledge that the desk top review did not take into account recent changes, but resorting to planning officers could not result in a proper, effective, consistent, thorough approach as it could only be as good as the varying experience of the particular officers consulted and the time available. No mention is made of any planning officers being designated to this role. At the very least, site visits should have been carried out at locations which warranted a site visit, such as where the data was poor, or the circumstances were unusual or the impact of the designation had a greater impact on the locality, property or site.

Consultations are only so good as the body receiving the information. Bratton Parish Council did receive the questionnaire in relation to the Settlement Boundaries, but according to the poor quality minutes, no steps were taken and in any event there was no response and the village was not engaged. Notification was sent to me on the adverse negative effects of the changes to the boundary at the point of my property. Had I been aware I would have been alerted and responded at that time.

.....

Relevant paragraphs of the WCS, the Plan and Topic Paper 1.

As set out in the Plan: 1.1 The purpose of the Wiltshire Housing Site Allocations Plan ('the Plan') is to:

Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and

Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026"

The Objectives of the Plan are:

3.1 Three objectives carry out the two purposes of the Plan to review settlement boundaries and allocate sites for housing development.
Settlement Boundary Review

3.2 The first objective for the Plan is to review settlement boundaries:
Objective 1: To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages
The WCS stipulates At Paragraph 4.13
These settlement boundaries will be reviewed as part of the Wiltshire Housing Site Allocations and Chippenham Site Allocations DPDs, as set out in the council's Local Development Scheme, in order to ensure they are up to date and can adequately reflect changes which have happened since they were first established. It will also be the prerogative of the community to review settlement boundaries through a neighbourhood plan. And at Paragraph 4.15
At Large Villages settlement boundaries are retained and development will predominantly take the form of small housing and employment sites within the settlement boundaries. These settlement boundaries will also be reviewed,..... in order to ensure that they remain up to date and properly reflect building that has happened since they were first established. Small housing sites are defined as sites involving fewer than 10 dwellings (i.e. not a major application). Development outside the settlement boundary will be strictly controlled. Relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement boundary to identify new developable land to help meet the housing and employment needs of that community.
The Plan stipulates:
Policies Map
1.16 On adoption, the Wiltshire Policies Map will be amended to include the proposals set out in Chapters 5 {Housing site allocations) and 6 {Settlement boundary review) of this Plan.
These proposals are set out in the Community Area Topic Papers which have been published as evidence to support this Plan.

2.8 Settlement boundaries have been used in development plans for the County for a number of years. The WCS retains them. Except in small villages each category of settlement has a "settlement boundary". In simple terms, they are the dividing line, or boundary between areas of built/ urban development (the settlement) and non-urban or rural development - the countryside. In general, development within the settlement boundary is, in principle, acceptable, whereas development outside the settlement - boundary is, with limited exceptions, not acceptable. The WCS uses settlement boundaries as a policy tool for managing how development should take place. Settlement boundaries are identified on the Policies Maps accompanying the WCS(S).

2.9 Other than in circumstances as permitted by other policies listed in paragraph 4.25 of the WCS, development will not be permitted outside the defined settlement boundaries.

2.10 The WCS, in paragraph 4.13, sets out the intention for the retained settlement boundaries to be reviewed through the Housing Site Allocations Plan and the Chippenham Site Allocations Plan. Settlement boundaries can also be reviewed by the community through neighbourhood plans. The previous boundaries did not always reflect the built extent of settlements because they were determined some years ago.

2.11 An objective of the Plan is therefore to review and update existing settlement boundaries to ensure they are up-to-date and accurately reflect circumstances on the ground, derived on a consistent county- wide basis.....
The Settlement Boundary Review Methodology paper, Topic Paper 1 states that (Paragraph 1.3 on page 11) "...the Council has undertaken a comprehensive review of the boundaries to ensure they are up to date and adequately reflect changes which have happened since they were first established. The Plan amends the settlement boundaries where necessary ...".
At paragraph 4.7 of Topic Paper 1 it states in relation to the two sentences in the WCS paragraphs 4.13. and 4.15 (emphasised in bold in the paragraphs set out above) "... the Council considers both sentences to be similar, with the words "adequately" and "properly" used interchangeably."
Purpose of the Settlement Boundary:
Referring to Topic Paper 1, this has the definition of the role of the settlement boundary and states in paragraph 7.14:

	<p>"7.14 The role of a settlement boundary is to define the built form of the settlement." And again: "Conclusion 7.17 Again, the purpose of the settlement boundary is to define the built form of a settlement"</p> <p>Schedule of Photographs submitted with the Representation Establishing the garden - dates of work.</p> <ol style="list-style-type: none"> 1. Aerial photograph of Grange Farm, 1998 2. Photograph from garden pointing South- East showing rear of 59 Lower Road & 57 Lower Road, ground works & grass planting on eastern section. 3. June 1998. Building the steps & wall to the side of the house, view to South showing cow shed/garage - this wall used as part of the physical boundary for the settlement boundary Red Line in Draft Plan (my late father-in-law shown) 4. June 1998. Phot to North from house, building the patio - dwarf walls of patio used for the settlement boundary Red Line (late husband shown). 5. Aerial photo of Grange Farm 1999 - patio in construction. 6. Aerial photo of Grange Farm 2005 - dwarf patio walls shown <p>The present position:</p> <ol style="list-style-type: none"> 7. Ground view of the garden from the back kitchen door looking North, Sept 2017 8. Aerial photo (7/09/17) from above showing the patio with Red Line of proposed Settlement Boundary added 9. Aerial Photo (7/09/17) from garden to the South-west showing the garden, patio and 2 Grange Court. 10. Aerial photo from (7/09/17) above field to the South showing settlement at junction of Lower Road and Court Lane (Trowbridge Road), garden , garage and part of Yew Tree House to the East (left hand)
<p>Attached files (Please see Objective)</p>	<p>4730781</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2526	Consultee Sue and Grant Dunkley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133360	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Surface Water The 'great flood' in 2007 caused much damage to property and distress to parishioners. Extra development will cause additional run off surface water which will increase the frequency of minor flooding in Tetbury Lane. This occurs now when we have heavy downpours. Photos are attached.</p>				
Attached files (Please see Objective)	4730770 / 4730777				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2527	Consultee Sue and Grant Dunkley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133360	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Sewage Can anyone guarantee that the current sewage system can cope with additional volumes?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2528	Consultee Sue and Grant Dunkley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133360	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Education Crudwell School is very successful and popular it is therefore at full capacity. The ability to expand is questionable because of known restrictions. The main road which is the main route to the school is busy with vehicles usually travelling above the speed limit and the footpath near the school is very narrow. This encourages (rightly so for safety of children) to drive to the school, resulting in severe congestion around the school. Additionally children going to the school will make the situation worse.</p> <p>General Will the development improve employment possibility, services and facilities? We think not.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2529	Consultee Sue and Grant Dunkley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133360	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>Employment</p> <p>There are no employment vacancies in the village so where are the additional residents going to work? Obviously not in the village this will increase traffic and have an impact as described in points (Traffic, School).</p> <p>General</p> <p>Will the development improve employment possibility, services and facilities? We think not.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2530	Consultee Ms Barbara Goodship	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133364	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to object to the proposed housing development at Southwick Court (Site 3565) & the revision of the adjacent Settlement Boundary. Please see my detailed objections below:</p> <p>Brown Fields Sites</p> <p>There are numerous brown field sites in Trowbridge that desperately need to be re-developed, many have been derelict for years, such as the Bowyers & Margaret Stancomb sites. SURELY BROWN FIELD SITES MUST ALWAYS BE USED FIRST! Once our beautiful countryside has been turned into tarmac & concrete, it will be gone forever.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2531	Consultee Ms Barbara Goodship	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133364		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I wish to object to the proposed housing development at Southwick Court (Site 3565) & the revision of the adjacent Settlement Boundary. Please see my detailed objections below: Trowbridge/Southwick Gap The Wiltshire Core Strategy (WCS) clearly recognises that "open countryside should be maintained to protect the villages surrounding Trowbridge". The development of Southwick Court which is in the parish of Southwick, yet on the edge of the Trowbridge Parish & Settlement Boundaries, will join Trowbridge & Southwick together & violate the WCS. It is essential that open countryside is maintained between Trowbridge & surrounding villages, otherwise their unique identities will be lost in urban sprawls.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2532	Consultee Ms Barbara Goodship	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133364	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to object to the proposed housing development at Southwick Court (Site 3565) & the revision of the adjacent Settlement Boundary. Please see my detailed objections below: Flooding & Pollution The Southwick Court site already suffers from serious flooding, & the surface water from Sandringham & surrounding roads drain into a ditch on its boundary. After a long wet spell the drainage system has backed-up forcing polluted water back into the gardens of the residents in Sandringham Road. Therefore the building of an additional 200 houses on the "Southwick Court Flood Plain" will only make this pollution worse & more frequent.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2533	Consultee Ms Barbara Goodship	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133364		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to object to the proposed housing development at Southwick Court (Site 3565) & the revision of the adjacent Settlement Boundary. Please see my detailed objections below:</p> <p>Access to Southwick Court The proposal to access the Southwick Court development from the North onto Silver Street Lane via existing roads is extremely worrying, as Silver Street Lane is already a rat run between the Bradley & Frome Roads. If access via Sandringham Road was to be chosen, then due to the contour of the road (2 blind bends) road traffic accidents would result, & a quiet cul-de-sac would become a busy commuting route.</p> <p>Furthermore to reach Southwick Court, the road would have to be extended through the communal open space & historic protected hedgerow. Please Note: Building a road through this communal open space would be in breach of the original planning approval & conditions/or the Home Farm Development in 1971.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2534	Consultee Ms Barbara Goodship	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133364	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.48			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to object to the proposed housing development at Southwick Court (Site 3565) & the revision of the adjacent Settlement Boundary. Please see my detailed objections below:</p> <p>Adjacent Settlement Boundary</p> <p>The proposal in Appendix A, on page 27, at Grid References G9 & GIO, is to move the boundary from currently being a hedge, trees & a brook, (clearly defined physical features) to exclude part of Sandringham Rd, a grassed Public Open Space & continue to Balmoral Rd.</p> <p>Para A1, explains that this is in Line with the Settlement Boundary Review Methodology & Table</p> <p>A1, 2nd Item, says "To remove an area more closely related to the countryside" The Public Open Space which would be excluded, is part of an integrated series of grass open spaces, that encompass the Home Farm Housing Development & were allocated in 1971 as part of the original planning consent. This Public Open Space is not closely related to the countryside, as it is not agriculture land.</p> <p>The proposed development of Southwick Court, on the other side of the current settlement boundary, will destroy this claimed "closely related countryside". There is NO justification for moving this boundary.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2535	Consultee Hannick Homes & Developments Ltd and Mr A Hawker	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133384	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Sustainability Assessment</p> <p>The Sustainability Assessment considers the SHLAA Site 690 with a site area of 3.8 hectares and capacity of 86 dwellings. There is no indication as to why a decision was made to reduce the site area other than perhaps consideration of the overall sustainability of the site in the Assessment Criteria and Output from Stage 4a of the site selection process (App. G, Chippenham C.A. Remainder Topic Paper) In terms of “overall sustainability” the assessment concludes that “the net developable area would need to be reduced to accommodate mitigation measures to ensure sufficient landscaping. Taking account of land needed to mitigate landscape, biodiversity and heritage impact issues the net developable area is considered capable of delivering approx. 50 dwellings which would significantly contribute towards meeting the overall indicative requirement for the Community Area Remainder.”</p> <p>However, if the purpose of the reduction of the SHLAA site 690 is to reflect the need to reduce the net developable area, this would not be effective in delivering the mitigation and benefits associated with development of the site.</p> <p>Paragraph 5.102 of the HSAP draws from the SA/site selection process by referring to the need for a sufficient buffer to be provided to the watercourse to safeguard the function of the tributary to the River Gauze and that this also provides options to deliver public open space and biodiversity enhancement. However, excluding the watercourse and its environs from the site allocation reduces the effectiveness of the Policy to deliver these potential benefits through the Development Management process. A future planning application would need to accord with the allocation boundary and could therefore not include associated public open spaces and biodiversity enhancements along the corridor of the watercourse as part of a comprehensive scheme. It is normal practice for allocated sites to include all land for development as well as any associated public open space and community facilities etc.</p> <p>Hannick have prepared an illustrative concept plan for SHLAA site 690 which demonstrates the additional benefits and mitigation that could be delivered by the larger site, compared with the proposed Policy H2.11. allocation. There would need to be a modest increase in the capacity of the allocation to about 70 dwellings, to support the additional benefits and provide surveillance of the parkland open space from a secure by design perspective. However, this would be at a reasonably density (< 30dph) to reflect the edge of village location and would not have a material impact above the allocated number.</p> <p>The SHLAA site 690 comprises 3.8 ha and has capacity for about 70 dwellings. An indicative concept plan is included as Appendix F and would deliver the following benefits:</p> <ul style="list-style-type: none"> • Land reserved for expansion of adjoining primary school (0.2ha) as confirmed in discussions with Local Education Authority and the draft allocation. • Potential improvements to the junction of The Street with Norton Road which may include the use of land within the control of Hannick. • About 28 affordable homes (40%) to meet local needs (compared to 20 for draft allocation). <p>The following mitigation and benefits would only be secured through the larger site 690 allocation:</p> <ul style="list-style-type: none"> • Additional off-street car parking area for school to address current congestion problems experienced at pick-up and drop-off times. 				

- New public parkland along watercourse for use by the development and existing community, excluded from the draft allocation site boundary.
- Potential for ecological enhancement along the watercourse corridor within the parkland.
- New equipped children’s play area and informal natural play features along the new parkland.
- Circular walk for residents within the parkland and the historic public right of way crossing the site, within an enhanced green corridor linking to The Street.

It should be noted that Hannick Homes are engaging with the Neighbourhood Plan Steering Group. Whilst the Neighbourhood Plan is at an early stage in preparation, an Open Day was held in April 2016 where the SHLAA sites were shown and pins used to indicate peoples’ preferences. The SHLAA site 690 had the highest recorded preference of those sites. The Open Day also sought people’s views on what they would like to see for the village. Some common suggestions relevant to the Option 2 proposals above, included:

- Improved off-street parking for the school
- Improved play facilities for children and teenagers
- Public park/green space for all village.

As indicated above, these local objectives can only be delivered with the larger site 690. In particular, engagement with the local community has revealed a chronic lack of parking space at the school with lack of parking spaces for staff and parents alike. This is leading to conflict with local residents due to parking congestion on the surrounding streets by parents during pick up/drop off times. It has also resulted in the school strongly discouraging local children from cycling to school due to the danger associated with children having to cycle around temporarily parked cars on the approach road. The obvious solution to this would be to extend the car park into the adjoining site and also potentially provide a pick up/drop off facility. Hannick would agree to such provision with a larger site. A lack of a children’s play area in the village has also been identified as an issue. Play facilities in the village for children of any age are very limited. There is some very basic equipment suitable for toddlers on the school grounds, which can only be used by local residents at the discretion of the school. This is not without its problems for the school, particularly security issues relating to members of the public accessing school grounds both during and out of school hours. The larger SHLAA site 690 option would allow sufficient space to provide a LEAP, or similar range of facilities, for use by the whole village. This would provide play facilities for a much wider age range and would also negate the need for the school to make its basic equipment available to all villagers. The opportunity to provide land for the expansion of the primary school is a key benefit that can clearly only be provided by this site. The existing site is 1 ha and to accord with DfE guidelines a further 0.2 ha requirement has been identified for a 1FE school. The Local Education Authority officer has indicated that further land to accommodate car parking would be welcomed. Hannick Homes and Mr A. Hawker propose that the allocation under Policy HC.11 should be increased in size to 3.8 hectares to reflect the SHLAA 690 site which was subject of the Sustainability Appraisal (SA). The allocation should also be increased to 70 dwellings as a reasonable density for the larger site. Specific changes sought by our client are as follows:

- Amend Policy H2.11 to refer to “approximately 70 dwellings” and replace the allocation plan with a plan that reflects SHLAA Site 690 – see Appendix A.
- Paragraph 5.100; replace first sentence with “Approximately 3.8 hectares of land adjacent to the Primary School is allocated for development of approximately 70 dwellings with public open space and 0.2 hectares to allow for the expansion of the school, with additional area of off-street parent parking.”
- Paragraph 5.102; amend first sentence with: “A sufficient buffer should be provided to the watercourse within the northern part of the site....”

Attached files (Please see Objective)

4731142 / 4731145 / 4731143 / 4731144

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2536	Consultee Hannick Homes & Developments Ltd and Mr A Hawker	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133384	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Transport & Access</p> <p>Transport is not identified as a constraint in the SA but the potential need for highways improvements is highlighted in paragraph 5.101. A Transport Appraisal has been commissioned by our client and is provided at Appendix E.</p> <p>The location offers the opportunity for sustainable travel modes, including walking to a range of facilities and a regular bus service to Malmesbury and Chippenham.</p> <p>Vehicular access has been assessed and would be by a priority junction onto The Street with the necessary visibility splays achievable commensurate with the 30mph observed speeds along this part of the road.</p> <p>It is noted that paragraph 5.101 identifies a need for improvements to the junction of The Street and Norton Road. However, this is in the context of access from the junction. Access can be safely provided some 100m from the junction. Notwithstanding this the appraisal considers potential improvements to the junction which could be delivered by an application.</p> <p>A survey of on street parking during school pick-up and drop-off indicates the extent of parking and benefit of providing off-street parking for the school and that the 25 spaces proposed would reflect demand.</p>				
Attached files (Please see Objective)	4731122				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2537	Consultee Hannick Homes & Developments Ltd and Mr A Hawker	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133384	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Heritage The SA notes that the site has medium archaeological potential and an assessment would be required. Our client has commissioned a Historic Environment desk based assessment which is included as Appendix D. The desk based assessment has not revealed any direct evidence of archaeological remains within the site. The site has low potential for significant remains from all periods. Any buried remains would not preclude development and a watching brief would be sufficient. It is also concluded that residential development would not result in harm to any other heritage assets, including the Hullavington Airfield Conservation Area.				
Attached files (Please see Objective)	4753414				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2538	Consultee Hannick Homes & Developments Ltd and Mr A Hawker	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133384	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Odour Assessment</p> <p>The Sewage Treatment works is approx. 220m to the north of the site and therefore the SA states that an odour assessment will be necessary to ensure that properties are not vulnerable to odour nuisance.</p> <p>Our client has commissioned an odour assessment report given part of the site is within the standard odour consultation zone, which is included in Appendix C.</p> <p>Odour dispersion modelling has predicted that only a very small portion of the north-western extent of the SHLAA 690 site lies within the I.S OUe/m2 contour, indicating that the proposed development is unlikely to be adversely affected by odours generated by the sewage treatment works. In fact this corner of the site, if included in the allocation, would be open space/parkland in any case.</p> <p>Wessex Water have accepted the report's conclusions as a representative assessment relating to odour emissions and impact upon future residents of new homes on the site.</p>				
Attached files (Please see Objective)	4731110				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2539	Consultee Hannick Homes & Developments Ltd and Mr A Hawker	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133384	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Foul & Surface Water Drainage The site is located in Flood Zone 1 although the SA notes that surface water and full drainage disposal may be an issue that would need to be addressed at application stage. Our client has commissioned a preliminary drainage assessment (Technical Note) which is included as Appendix B to the representation. Preliminary assessment indicates that infiltration type SUDS will be viable on the site and any residual run-off would be to the existing watercourse. There are adopted foul sewers located immediately adjacent to the site. The capacity would need to be investigated, however it is noted that Wessex Water have confirmed that capacity exists to the Neighbourhood Plan Steering Group.</p>				
Attached files (Please see Objective)	4731099				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2540	Consultee Hannick Homes & Developments Ltd and Mr A Hawker	Agent Mr Glenn Godwin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133384	Pegasus Group Person ID: 825048	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus are instructed to submit representations on behalf of Hannick Homes (Hannick) and Mr A Hawker, who control land at The Street, Hullavington, which has been promoted as SHLAA Site 690.</p> <p>Hannick support the Policy H2.11 allocation of land at The Street, Hullavington as a sustainable location, consistent with the NPPF and the adopted Wiltshire Core Strategy.</p> <p>The land as allocated can be viably developed for about 50 dwellings with land (0.2ha) reserved for expansion of the school as agreed with the Local Education Authority. However, the allocation is considered to be unsound insofar as the draft allocated site has reduced the size of the SHLAA site 690 without justification, which will limit the effectiveness of the policy to deliver the range of additional associated planning benefits to the village which can be provided by the larger site, without any material increase in impact from the development.</p> <p>A location plan indicating the SHLAA site 690 is included as Appendix A to these representations.</p> <p>Hannick would first support the sustainability of the location of land North of The Street, Hullavington for residential development and the findings of the site selection process set out in the Chippenham Community Area Remainder Topic Paper and Sustainability Appraisal.</p> <p>The SA Summary Assessment of the Site (Appendix F, Chippenham CA Remainder Topic Paper) assesses the full SHLAA site of 3.8 hectares and whilst finding the site to be more sustainable than other options, makes reference to areas requiring further assessment. This would form part of the application process, however Hannick have undertaken several preliminary surveys and assessments which demonstrate the sustainability of the site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2541	Consultee Nicola Duke Parish Clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Dilton Marsh Parish Council Person ID: 1133403		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.60			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Chairman and members of the Parish Council discussed the review of the settlement boundaries at a meeting of the Council held on Thursday 21st September 2017.</p> <p>Firstly, the parish council wishes Wiltshire Council to note that it is currently in the process of preparing a Neighbourhood Plan. The neighbourhood area has been designated, a steering group established and a Wiltshire Council link officer has been appointed. The parish council would be grateful if this update could be reflected in the consultation material.</p> <p>Following debate on the settlement boundary for Dilton Marsh the Chair and members resolved that the parish council did not support any changes to the settlement boundary until the Neighbourhood Planning process has been completed. It was however noted that one site which could be considered for inclusion in the settlement boundary at a later date was the Bullivant site, off Petticoat Lane.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2542	Consultee Ms Rebecca Randall	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I would like to make my concerns known regarding the proposed development of the above sites, located within a very small area. These developments will destroy valued countryside between Trowbridge and Southwick, which provides a clear barrier between the town and the village, green fields which make the area a pleasant place to live in, and a lovely area for walking.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2543	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	245 is a significant number of extra homes to put into a small area. The A361 is already hugely congested. The queues in and out of Trowbridge in the rush hour are horrendous. I find it hard to believe that these sites are preferred as residents here would be more likely to walk into the town rather than drive; how has this conclusion been arrived at? Where is the evidence to support it?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2544	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The effect on already overstretched local GP services can only be damaging, yet I note there is no definite commitment to increase provision. Similarly with local school places.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2545	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The effect on already overstretched local GP services can only be damaging, yet I note there is no definite commitment to increase provision. Similarly with local school places.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2546	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The effect on already overstretched local GP services can only be damaging, yet I note there is no definite commitment to increase provision. Similarly with local school places.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2547	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Local wildlife includes colonies of bats and herds of deer; the effect on wildlife will be seriously detrimental.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2548	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Local wildlife includes colonies of bats and herds of deer; the effect on wildlife will be seriously detrimental.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2549	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Local wildlife includes colonies of bats and herds of deer; the effect on wildlife will be seriously detrimental.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2550	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I do not understand why the Southwick Court scheme has been progressed at all when it is 'less sustainable'.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2551	Consultee Ms Rebecca Randall	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1116552		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There are a lot of Brownfield sites in the town centre which need re-development and blight the look of the town. So why build on open countryside when the vast number of new homes Trowbridge is expected to provide could in fact be built on the Bowyers site, the County Council East Wing, Margaret Stancomb School site, etc.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2552	Consultee Simon and Joanne Carpenter	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133425	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express our concerns regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Plan. With the 10 dwellings already being built on this site, this represents a near 20% increase in dwellings in the village of Crudwell (currently some 260 dwellings).</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2553	Consultee Simon and Joanne Carpenter	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133425	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Our house in Crudwell have experienced severe flooding at least 3 times and small water entry at least twice, since we have lived here (21 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development. We live in the constant fear of being flooded again, we on several occasions have moved a lot our furniture and belongings upstairs when we have a heavy rainfall not to have them flood damaged again.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2554	Consultee Simon and Joanne Carpenter	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133425	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village. I am a frequent walker along Tetbury lane and is aware of the already amount of traffic using this road, it is dangerous when two cars can't pass in places, with more houses at the ridgeway site it will only increase the traffic using in places a narrow lane. If people can't walk safely with their children along Tetbury Lane they will use their car to get to school or the village hall instead of walking creating more cars at the school which is a chaotic area at school times.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2555	Consultee Simon and Joanne Carpenter	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133425	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell in not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2556	Consultee Bev Bass	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133436	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a Harnham resident, I share the concerns of many people regarding the plan H3.1 at Netherhampton Rd. Especially the impact on the existing road system from the inevitable massive increase in volume of traffic. H3.3 to the North of Netherhampton Rd would have less impact as a "stand alone" development, but environmentally seems unlikely to be viable due to the proximity of the water meadows. However, H3.4 which will extend the existing Rowbarrow development, appears to be perfectly acceptable, based on the available land in that area, the current road system and the local facilities and transport links. Having moved to a "new development" in Harnham 22 years ago I am well aware of local residents objections to new housing in the area, but new houses will always be needed and hopefully sufficient planning will go into the necessary infrastructure to support each development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2557	Consultee Bev Bass	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133436		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a Harnham resident, I share the concerns of many people regarding the plan H3.1 at Netherhampton Rd. Especially the impact on the existing road system from the inevitable massive increase in volume of traffic. H3.3 to the North of Netherhampton Rd would have less impact as a "stand alone" development, but environmentally seems unlikely to be viable due to the proximity of the water meadows. However, H3.4 which will extend the existing Rowbarrow development, appears to be perfectly acceptable, based on the available land in that area, the current road system and the local facilities and transport links. Having moved to a "new development" in Harnham 22 years ago I am well aware of local residents objections to new housing in the area, but new houses will always be needed and hopefully sufficient planning will go into the necessary infrastructure to support each development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2558	Consultee Bev Bass	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133436	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a Harnham resident, I share the concerns of many people regarding the plan H3.1 at Netherhampton Rd. Especially the impact on the existing road system from the inevitable massive increase in volume of traffic. H3.3 to the North of Netherhampton Rd would have less impact as a "stand alone" development, but environmentally seems unlikely to be viable due to the proximity of the water meadows. However, H3.4 which will extend the existing Rowbarrow development, appears to be perfectly acceptable, based on the available land in that area, the current road system and the local facilities and transport links. Having moved to a "new development" in Harnham 22 years ago I am well aware of local residents objections to new housing in the area, but new houses will always be needed and hopefully sufficient planning will go into the necessary infrastructure to support each development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2559	Consultee Mr Adrian Hallworth	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133437		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to object to the proposed 40 house development on site 321 (Westbury Road, Bratton)</p> <p>My address has been my family home for over 60 years & the proposed development would have a highly detrimental effect upon the amenity which we enjoy (& have enjoyed for 60 years).</p> <p>The proposed almost ghetto style development is wholly out of character with the village of Bratton.</p> <p>The proposed development is unnecessary to the published needs of Bratton village.</p> <p>The proposed development would be on Green Belt land & adversely affect local SSSI sites, as well as detrimentally affecting the local view from Bratton Camp/Westbury White Horse.</p> <p>There B3098 is a "fast" road which has suffered a notable number of traffic accidents/collisions. Indeed, several have occurred directly outside my own property, opposite the proposed development site.</p> <p>Planning permission has previously been rejected on this site by the Parish/Local Council</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2560	Consultee Mr Adrian Hallworth	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133437		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed almost ghetto style development is wholly out of character with the village of Bratton. The proposed development would be on Green Belt land & adversely affect local SSSI sites, as well as detrimentally affecting the local view from Bratton Camp/Westbury White Horse.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2561	Consultee Mr Adrian Hallworth	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133437		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed development would be on Green Belt land & adversely affect local SSSI sites, as well as detrimentally affecting the local view from Bratton Camp/Westbury White Horse.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2562	Consultee Mr Adrian Hallworth	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133437		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There B3098 is a “fast” road which has suffered a notable number of traffic accidents/collisions. Indeed, several have occurred directly outside my own property, opposite the proposed development site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2563	Consultee Mr Martin Frayling	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133467	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With reference to the proposed development policy H2.11 to the field of 2.44ha adjacent to Hullavington Primary School. I accept the need for some housing development in the area around Hullavington but was alarmed to see that Hannick Housing had added a second proposal for a further twenty houses in the adjacent field to the north with the watercourse flowing through it. If this further development was allowed to go ahead it would have a detrimental effect and impact the area as follows:</p> <p>a) The field to the north with the watercourse would be classed as rough grassland for cattle to graze. Because this field has a considerable area within it that is wet and boggy for most of the year it has not been ploughed or cultivated in living memory. Cattle are only kept in this field from spring to autumn as it is too wet for the rest of the year. As a consequence of this it supports a large populations of voles and other small mammals. This in turn attracts Barn Owls that are regularly seen in the spring quartering the field in search of these mammals to successfully rear their young. This rough grassland is now getting rare and birds of prey such as Barn Owls are dependent on it.</p> <p>b) Kestrels are seen regularly hovering over this field because of the abundance of natural food, i.e. voles and small mammals</p> <p>c) During the winter months snipe are attracted to the watercourse and wetland areas to feed. These birds are very shy and any development in this field would have a disturbing influence on them. All of the birds listed are now nationally in decline.</p> <p>d) During the summer months bats fly along the hedgerows and over this field in search of moths and other flying insects that are abundant due t the undisturbed nature of this field</p> <p>e) The dry stone wall that is the boundary of this field to the village and runs down nearly to the watercourse provides a good habitat for voles and amphibians such as newts. My next door neighbour Mr Peter Tracey found a newt on his kitchen floor three or four years ago and must have come from the watercourse or the dry stone wall that is only a few metres from his door at No. 51</p> <p>In conclusion I would ask you not to include the field north next to the proposed development and by allowing this field to act as a buffer strip between the school field and the watercourse it would limit the environmental impact and give some protection to the wildlife that is dependent on this type of undisturbed grassland.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2564	Consultee Mr David Aitken Property Surveyor	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133465	Person ID:	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site Brook House, Cricklade			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for your letter of 12 July 2017 addressed to Brook House, Cricklade regarding the planning consultation process. I have subsequently had a conversation with Wiltshire Council today about the Brook House site having considered the draft Wiltshire Housing Site Allocations Plan. Please find attached the completed Representation Form. I understand an email from me is going to be acceptable. The downloaded form is a pdf copy from your website. The changes we would like made to Brook House in the draft Housing Site Allocations plan are set out below: Please refer to the Promap of the Brook House site attached. The changes that we would like to make to the draft Wiltshire Housing Allocations Plan is to review the current site allocation and provide a Housing Site Allocation for Brook House, Cricklade, Swindon, Wiltshire, SN6 6DD for future new Class C2 and C3 Housing, that would allocate the barn, stables and field for new housing to be built. The barn and stables could be converted and extended into two Class C3 detached houses and in the field new housing could be provided along the existing residential boundary of the existing Red Lion Lane and Abingdon Court houses. We feel that a Class C3 use on part of the field to provide up to 8 detached dwellings should be allocated in the site allocations plan.</p> <p>The main house Brook House would still retain a sufficient amount of amenity space and back garden.</p> <p>If a new housing allocation for Brook House is made another option would be to convert the large house into a Class C2 residential institution and provide Care Home accommodation for elderly people in need of care. There is a need for more care facilities in Cricklade.</p> <p>The house and property sits on the edge of the town centre and is already in a residential area with established residential use along two boundaries of the field. On the Promap attached please refer to Garden Bungalow, Thameside, Aetheimar House and Hatchetts Bungalow. The old farm buildings along the other boundary of the field have already been turned into retirement housing and the old farmhouse has been demolished and recently a new detached house built in 2016. The total site area of Brook House is approximately 3.5 acres and suitable for redevelopment to housing being so close to the town.</p> <p>Based on the Promap of Brook House and the large field at the back shown in green a number of sketch development feasibility studies have been produced for new housing on the Brook House site and in the field. These are available for you to review. I can forward a copy to you for your consideration upon request.</p> <p>We would ask that Wiltshire Council consider the Brook House site on the edge of Cricklade town centre for future new housing in the Wiltshire Plan and provide a Housing Site Allocation for Brook House.</p>				
Attached files (Please see Objective)	4731336 / 4731337 / 4731338				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2565	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I write with particular concern for site 3565 between Lambrok Stream/Boundary Walk Trowbridge and Southwick Court in Southwick (plan reference H2.6). On page 181 of Wiltshire Core Strategy it is stated that open countryside should be maintained to protect the character and identity of villages as separate communities. The proposal to build houses on site 3565 seems to be contrary to this aim. Additionally, in your Wiltshire Council Site Allocation Plan it is noted that site 3565 separates Trowbridge from Southwick and that development would potentially threaten the separate identity of Southwick and the intrinsic quality of the countryside. The green spaces we have in and around Trowbridge are beneficial to residents' health and welfare. I hope you will oppose the allocation of site 3565 in order to maintain open countryside and protect the character and identity of Southwick as a separate community				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2566	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition I note that on page 195 of Wiltshire Council Site Allocation Plan it states that development of site 3565 would result in the permanent loss of agricultural land.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2567	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	On page 206 it is stated that the proposed development would introduce an urbanising effect to what is currently agricultural land.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2568	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	With regard to your site selection process, I note in your documentation that Strategic Housing Land Availability Assessment (SHLAA) sites are rejected from further consideration or their capacity reduced where affected by obstacles to development such as heritage and wildlife designations and flood plain. Site 3565 between Lambrok Stream/Boundary Walk Trowbridge and Southwick Court in Southwick is affected by these obstacles. The land floods easily and some houses in Sandringham Road have had flood water in their rear gardens. If houses were built on site 3565 then the problem would be increased. On page 200 of Wiltshire Council Site Allocation Plan, in the context of flooding on site 3565, it is stated that "conventional soakaways/infiltration systems may not work due to underlying soil/geological conditions. The land is prone to holding surface water after prolonged periods of rain". Test bore holes were drilled in July 2017 and these filled very quickly.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2569	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The heritage value of site 3565 is noted in the Site Allocation Plan with mention of the Post-Medieval water meadow system and Grade II listed farmstead. It is recognised that a detailed assessment of the heritage assets and their setting would be required.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2570	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The mature hedgerows and trees provide a habitat for wildlife. The presence of bats and other protected species has been recorded. The hedgerow is an ancient parish boundary. Given the points above it is difficult to understand why site 3565 is being considered for development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2571	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I attended the Wiltshire Council Cabinet meeting in the Council Chamber on 20 June 2017, and the public exhibition at County Hall, Trowbridge on 26 July 2017. On both occasions concern was raised about access roads and the increase in traffic.</p> <p>With regard to site 3565 between Lambrok Stream/Boundary Walk Trowbridge and Southwick Court in Southwick I could not get an answer at the public exhibition on 26 July about the location of vehicle access routes to and from the site. This is an important consideration for a proposed development of 180 houses as most households now have at least two cars.</p> <p>In the Wiltshire Council Site Allocation Plan on page 201 mention is made of air quality. The plan optimistically states that people will walk or cycle to schools, shops and other facilities. This is laudable but unrealistic. The Grove School in Hazel Grove has had such problems with traffic that there is currently an Experimental Order in place. There is 'No Waiting' in Hazel Grove from Mondays to Fridays from 3pm to 6pm. This has resulted in an increase in vehicles parking in Silver Street Lane and the top of Balmoral Road. Balmoral Road is a 'No Through' residential road with mature roadside trees. Balmoral Road would not be a suitable access route to the proposed development on site 3565 as it curves with a blind bend and separates into two cul-de-sacs as well as giving the only vehicular access to Holyrood Close. The Balmoral Road junction at Silver Street Lane is almost directly opposite Hazel Grove so a large increase in traffic and parked cars could compromise the safety of school children.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2572	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Also raised was the need for sufficient places in schools and enough doctors and dentists to deal with the increase in population. In relation to school provision, I note that Grove School has applied to renew planning permission on a mobile classroom. The lack of sufficient space in a permanent building is a matter of concern. Mobile classrooms can be cold and damp in winter and too hot in summer. I am not clear that sufficient school places within reasonable travelling distance of the proposed housing development will be available.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2573	Consultee Mrs G Bright	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133460		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I can appreciate that there is pressure on Wiltshire Council from Central Government to provide additional housing. My concern is the allocation of the sites under consideration. Surely priority should be given to making full use of all the Brownfield sites such as Bowyers, East Wing, Trowbridge Hospital, Margaret Stancomb school and the former District Council Offices. Also, is sufficient pressure being put on the Developers who hold granted planning permission but are not actually building? The Campaign to Protect Rural England have been analysing local authority plans and their report urges local authorities to set a clear requirement that all suitable Brownfield sites must be built on before any protected green site is considered for development. The Times newspaper, dated 3 July 2017, quotes a spokesman for the Department for Communities and Local Government, "We have been clear that councils must prioritise development on Brownfield land".				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2574	Consultee Ms Frances Southern Person ID: 1120634	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Ordnance Survey map (100049050) is inaccurate so how can you plan the future if you have not got the status quo accurate. I refer to No. 53 Lower Road - the extension is not on the map and therefore the boundary change to No. 51 Yew Tree Farm are ineffective. The boundary of the parish should not need changing for Lower Road.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2575	Consultee Mr Peter J Wordley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133485		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Formal Complaint / Objection</p> <p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. The field system is a recognisable part of our heritage and dates back hundreds of years in its current form. The land has been used by many generations for its current use of farming and recreational space and is a valuable and valued asset to the local community. The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. There is no need to forever lose this valuable space.</p> <p>In view of the above, I urge you to reject the proposal for the building of new dwellings on this historic area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2576	Consultee Mr Peter J Wordley	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133485	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Formal Complaint I Objection</p> <p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. Housing on this site would not only contradict government policy of building on brownfield sites in preference to Greenfield, but would cause massive problems in its creation and existence for current residents.</p> <p>The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. There is no need to forever lose this valuable space.</p> <p>In view of the above, I urge you to reject the proposal for the building of new dwellings on this historic area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2577	Consultee Mr Peter J Wordley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133485		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Formal Complaint / Objection</p> <p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. Given that much of the building would take place in an area of notified flooding and standing surface water, the existing residents would have their property seriously threatened by an increased risk of flooding.</p> <p>The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. There is no need to forever lose this valuable space.</p> <p>In view of the above, I urge you to reject the proposal for the building of new dwellings on this historic area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2578	Consultee Mr Peter J Wordley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133485		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Formal Complaint / Objection</p> <p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. There is no need to forever lose this valuable space.</p> <p>In addition, the access to this site would seem to me to wholly inadequate. Access from the A361 would cause further chaos in an already heavily used section of road where near-misses are commonplace.</p> <p>With little job opportunities in the Trowbridge area, the road and rail links, already under tremendous pressure, will become further saturated and difficult to use.</p> <p>In view of the above, I urge you to reject the proposal for the building of new dwellings on this historic area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2579	Consultee Mr Peter J Wordley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133485		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Formal Complaint / Objection</p> <p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. There is no need to forever lose this valuable space.</p> <p>Access through existing housing areas such as Balmoral Drive, Marston Road and Sandringham Road would be equally dangerous and would cause a significant increase in noise and air pollution - my own health could be dramatically affected in the negative as I am on special medication due to breathing related issues and our garden, in which I necessarily need to spend a great deal of time, is roadside as opposed to behind the house. This can only increase the potential for further deterioration in my health.</p> <p>In view of the above, I urge you to reject the proposal for the building of new dwellings on this historic area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2580	Consultee Mr Peter J Wordley	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133485		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Formal Complaint / Objection</p> <p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. There is no need to forever lose this valuable space.</p> <p>Communications and other infrastructure requirements in the area also appear to be inadequate.</p> <p>In view of the above, I urge you to reject the proposal for the building of new dwellings on this historic area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2581	Consultee Lt. Col. Michael Whelan Person ID: 862330	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.35				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Further to the recent publication of the Draft Wiltshire Housing Site Allocations Plan, I attended the public consultation event in Chippenham and had the opportunity to speak to one of your team about submitting a request for the settlement boundary around Crudwell to be revised for my property. From this discussion, they advised me to submit a representation with the relevant information for your consideration.</p> <p>My property is called Ravenscourt and lies within grids 16 & J6 of the Crudwell boundary map, located on the eastern side of the A429 in the middle of Crudwell village. Under the draft boundary review, only some of my garden is being included in the plan and I would be grateful if you would consider including all of my residential property within the boundary. This would then ensure the curtilage of my property that relates more closely to the built environment is included and would provide a very clear boundary definition along stock-proof fences that are legal obligations upon me to maintain. The ability to extend the built form of the settlement within this land is extremely limited and is again prevented through a specific clause in a legal conveyance that states the land must be only used in relation to the single property known as Ravenscourt.</p> <p>In 1995, two outbuildings located within the property were subject to a change of use request from agricultural to residential and as use as ancillary accommodation. The request was granted and the outbuildings have been used as garaging and storage for Ravenscourt since that time. In 2014, the land to the NW of one of the outbuildings was granted a change of use to residential and for use as a garden for Ravenscourt. This land in question was not included in the draft settlement boundary review, but the outbuilding was. It is requested that this land be included within the boundary as it is an integral part of the built form of the property. It is currently used as a parking area for Ravenscourt.</p> <p>In 2016, an application to the Bristol Diocese was made to purchase a small strip of land around the North and East boundary of Ravenscourt, which was agreed. This small piece of land had a conveyance attached to it, stating that it was to be used for residential uses only in connection with Ravenscourt and that a fence was to be erected in perpetuity between the open countryside beyond and the land being sold. The nature of this conveyance means that there is now a clearly defined boundary between Ravenscourt and the open countryside along which the revised boundary could run as it would follow a defined physical feature that had to remain in place. Whilst this land does border the open countryside, there is very limited capacity to extend the built form of the settlement within it due to its scale and location and due to legal restrictions placed upon it by Bristol Diocese.</p> <p>I have provided a number of documents to support this request for review and these are attached: Document 1 is the existing Land Registry title for Ravenscourt. Document 2 is the existing revised settlement boundary proposal, with the 2014 change of use land highlighted in yellow. The additional land purchased from Bristol Diocese is shown as a red dotted line along the fence-line. Document 3 is the TP1 showing the area of land purchased from Bristol Diocese and the legal covenants placed upon us by the sale. Document 4 shows a number of photographs of land granted a change of use and its use as a parking area as well as the fence-line erected following the purchase of land from Bristol Diocese.</p> <p>Should you feel a site visit is required in order to fully assess this request, I would be more than happy to accommodate this visit. I stand by to provide any further information you should require and await you decision.</p>				

Attached files (Please see Objective)	4731359
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2582	Consultee Mr R Nevill	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133494	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4,1 - 4.72		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Base Data</p> <p>At the time of writing, both the draft plan and the published evidence apply a base date of the 1st April 2017, although these figures are provisional as the final figures are yet to be published. This is unfortunate given the time that has passed since the base date and that representations are now being sought on this Pre-Submission Stage.</p> <p>From previous examinations we have been involved in, it is not uncommon for the Council to update or provide new evidence in relation to its housing land supply position post submission of the plan, or even during the examination. In this instance Topic Paper 3 advises that the housing supply will be updated to the 1st April 2017 base date prior to the consultation on the submission draft. Therefore at that stage we can give full and proper consideration and respond to that new evidence which will be prepared in order to demonstrate that the plan is sound.</p> <p>[see attached for representation in full]</p>				
Attached files (Please see Objective)	4731454				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our client has recently had an application refused and is the subject of an appeal. The site is a sustainable extension to Westbury and we consider that the site should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.				

Comment ID:	2583	Consultee Mr R Nevill	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133494	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.1 - 4.72		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There a number of key conclusions:</p> <p>The first is that it is not properly prepared as the OAN was 44,000 dwellings as confirmed by the Core Strategy Inspector. The requirement of 42,000 was adopted on the basis that:</p> <ul style="list-style-type: none"> • It was a minimum; • The Core Strategy provided flexibility; and, • The Council would undertake a SHMA in 2016. That has subsequently not been undertaken. <p>The second is that the Site Allocations Plan should be providing sufficient sites to meet the 44,000 dwelling OAN. The plan is not effective or consistent with national policy.</p> <p>The third is that even on the requirement in the Core Strategy there is insufficient flexibility and a greater number of sites should be allocated for development. As drafted the plan is not effective or consistent with national policy.</p> <p>Under either scenario, a greater number of sites should be allocated which can assist meeting the housing needs in Wiltshire and specifically the North and West HMA. Our clients have 3 that are deliverable in the 5 year period. As drafted the plan is not justified.</p> <p>[for full representation is attached]</p>				
Attached files (Please see Objective)	4731454				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2584	Consultee Mr R Nevill	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133494	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.1 - 4.72		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Council's 2017 provisional statement does not provide a robust assessment of the supply and it is relying on the April 2016 base date (March 2017 update). In order for the plan to be assessed for its soundness then it will be necessary for the April 2017 Housing Land Supply Statement to be published and consulted upon. As drafted it is not positively prepared, justified, effective or consistent with national policy. However on the evidence in the current consultation further sites are required to be allocated. [See attached for full presentation]				
Attached files (Please see Objective)	4731454				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our client has recently had an application refused and is the subject of an appeal. The site is a sustainable extension to Westbury and we consider that the site should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.				

Comment ID:	2585	Consultee Mr R Nevill	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133494	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A.44 Royal Wootton Bassett Settlement Boundary	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We object to the settlement boundary as currently drafted. The reason for this is that the methodology sets out a number of criteria for how the settlement boundaries have been defined. One of the criteria is: “builtand commenced residential and communities facilities development such as religious buildings, schools and community halls that is physically related to the settlements”.</p> <p>Our client has had a number of planning permissions at Royal Wootton Bassett over the last number of years and these developments have necessitated changes to the settlement boundary for Royal Wootton Bassett as set out in the plan in Appendix A. This correctly shows some of these permissions being included within the settlement boundary. However the revised settlement boundary has not taken into account the extant consent to the south of the Interface Business Park. That application (14/03343/FUL) was for 68 dwellings and outline consent for a 39 bed care home and 22 age restricted dwellings and Country Park. There has been subsequent consent on the care homes scheme for additional dwellings. Enclosed at Appendix EP1 is the location plan for the permission which we can confirm has been commenced and under construction. Therefore the settlement boundary for Royal Wootton Bassett should be amended to reflect these consents.</p> <p>We consider that the settlement boundary should be revised to take account of the whole site including the open space/country park as this would accord with Criterion 4 in Table 8.1 which proposed to include within the settlement boundary: “recreational or amenity space at the age of settlement that relates more closely to the built environment.”</p> <p>It is apparent from the extant consents on the site and how the country park relates to the settlement that the settlement boundary should be drawn along the railway line which forms the southern boundary of our client’s landholding.</p>				
Attached files (Please see Objective)	4731454				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our client has recently had an application refused and is the subject of an appeal. The site is a sustainable extension to Westbury and we consider that the site should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.				

Comment ID:	2586	Consultee Mr R Nevill	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133494	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A44. Trowbridge Settlement Boundary	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We note that the methodology now excludes sites allocated in the Development Plan. We consider that this is not appropriate for the reasons given in paragraph 7.15 and 7.16. By way of example, our client's site at Drynham Lane, Trowbridge is allocated in the Core Strategy as part of a wider Ashton Park Urban extension. However the revised settlement boundary for Trowbridge excludes the whole of the Ashton Park Urban extension. This applies to all settlements which have allocations in the Core Strategy. However these are sites which the Council is reliant on to deliver the much needed new homes in Wiltshire and as the revised settlement boundaries will form the development plan then they should reflect the adopted policies and allocations in both the Core Strategy and this Allocations DPD. It will also give certainty to anyone reading the development plan on the precise status of these allocated sites.				
Attached files (Please see Objective)	4731454				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our client has recently had an application refused and is the subject of an appeal. The site is a sustainable extension to Westbury and we consider that the site should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.				

Comment ID:	2587	Consultee Mr R Nevill Person ID: 1133494	Agent Mr Stephen Harris Director Emery Planning Person ID: 389561	Do you consider the draft WHSAP is legally compliant?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.	Omission site - land at Bratton Road, Westbury			Positively prepared Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We also seek the allocation of Mr Nevill's site at Bratton Road, Westbury. This would provide the opportunity to deliver a sustainable development in accordance with the NPPF, addressing the three dimensions of economic, social and environmental sustainability. Westbury lies in the North and West Wiltshire Housing Market Area (NWWHMA).</p> <p>The site is located on the eastern edge of Westbury, immediately adjacent to the settlement boundary. It is bordered to the north and to the east by agricultural land, apart from a small section to the northwest which is adjacent to Coach Road. To the south is Bratton Road and a cemetery, while to the west, a small area of amenity land separates the site from Bitham Park. To the west of Bitham Park is an existing housing development.</p> <p>An application for development comprising up to 47 new dwellings (reference 16/06413/OUT) was refused in January 2017 and is now the subject of an Appeal against the decision. The assessment of the site's characteristics carried out to inform the decision concludes that there are no aspects of the proposal that would make it unacceptable, except for the conflict with policy on development outside the settlement boundary and the need to contribute to the improvement of employment opportunities and other services and facilities in the town centre.</p> <p>Contribution to Supply</p> <p>As we discuss elsewhere, Wiltshire Council state that they can currently¹ demonstrate a five year supply of housing land in the NWWHMA. However, this follows a period when a 5 year supply has not been demonstrated and thus we consider the supply position is fragile and in need of more sites to be identified to ensure that the supply is maintained.</p> <p>Table 4.1 of the draft Site Allocations Plan sets out an overall requirement for the NWWHMA of 24,740 dwellings for 2016 to 2026, identified completions between 2006 and 2017 of 12,603 dwellings and identified commitments of 11,566. This leaves a minimum to be allocated of 571 dwellings</p> <p>Table 4.10 of the draft Allocations Plan confirms a surplus of identified supply over the requirement for Westbury. However, it also confirms that there is only a 1% positive variation across all the urban areas. Table 5.4 of Topic Paper 4 confirms that excluding windfalls there is a surplus across the whole plan area of only 624 dwellings, or 2.5% of the total requirement.</p> <p>Table 4.10 also highlights the significant deficit in supply in terms of both Warminster and Trowbridge, which are higher order 'Principal Settlements' as identified in the Core Strategy. Both these towns are in close proximity to Westbury with Warminster being approximately 4 miles distant and Trowbridge is some 6 miles away. Good public transport links are available to both settlements and there is therefore the case that development at Westbury can in the short term assist in addressing the shortfall that seems to be persisting in the growth of these settlements compared to the aims of the Core Strategy.</p> <p>The Topic Paper 4 (Developing Plan Proposals) published alongside the draft Site Allocations Plan provides further analysis of the identified housing supply and the relationship with the spatial strategy set out in the Core Strategy. Table 5.5 provides an analysis for the 5 year housing land supply (2017 to 2022) for the NWWHMA. This states that there is a deliverable supply of 9,643 units or 7.15 years supply over this period. Table 5.7 then sets out the conclusions of the Council's 'resilience testing' assessment for the sources of the supply. This notes that</p>			

“over a quarter of new dwellings are anticipated to be built on strategic sites and plan allocations that do not have planning permission.”^{1.5} The table further notes that:
“In the past five years overall completions have continued to be just below the average annualized HMA figure.....Falling short of annualized rates can imply that there is vulnerability in the surety of supply.”
At paragraph 5.11, the paper goes on to state:
“There is a significant reliance on large strategic housing sites to meet strategic requirements in the HMA.”
While at paragraph 5.12, with respect to the expanding role of the strategic sites in contributing to housing growth, the paper states that:
“It would however be unwise to place too much reliance on this being the case when some key strategic sites have yet to gain planning permission.”
The acknowledgement that the ability of the plan to deliver housing growth is reliant on large strategic allocations with the associated risks that delivery will be delayed is evidence that supports the allocation of further sites where they are evidently deliverable and not strategic in scale, particularly in the short term.
We therefore consider that there is a need for additional sites to be brought forward in the short term in Westbury to provide for the necessary level of flexibility within the plan proposals for delivering new housing. We will set out here that the site at Bratton Road has no site specific constraints to development, is of a scale that does not require significant infrastructure to be provided in advance and could be delivered in the very near future.

Sustainable Development
The site is located within a reasonable walking distance of the important everyday services and facilities available locally and within Westbury town.
The site is also accessible by non-car modes of transport. Bus services are available from stops close to the site with these being appropriately timed and to an appropriate frequency to allow for higher order retail trips, leisure trips and some employment trips. Cycle access can be obtained via the former Coach Road and Bitham Park.
Delivery of this site would contribute to social sustainability as it is proposed to deliver up to 47 new dwellings, including 14 affordable homes to meet the required 30% contribution and the remainder being open market housing. This would meet identified housing needs in the NWWHMA as defined in the adopted Core Strategy.

In terms of economic sustainability, development of housing at this site would:
Create construction related jobs and indirect jobs during the build programme, benefiting local contractors and suppliers;
Help to ensure that there is a stable workforce in terms of ability and age;
Lead to an increased expenditure in Westbury and the surrounding area by residents of the scheme. The proposed development would therefore generate significant spending in the Wiltshire which would help create full time jobs in the local retail, service and leisure sectors
In addition to the above, deliver a New Homes Bonus and Council Tax income for the Council

With respect to the environmental aspect of sustainable development,
The allocation of our client’s site would result in the loss of open countryside. However, we note that the Council is relying on sites in the open countryside to meet its housing requirement to 2026 elsewhere across the plan area;
No concerns with respect to flood risk or drainage have been raised during consideration of technical work underpinning the proposals. The site lies within Flood Risk Zone 1;
Access would be taken from a priority junction on Bratton Road. An assessment of the transport impacts has not found any severe adverse impact and there were no objections on highways grounds to the earlier application;
The site is not subject to any special landscape designations. In terms of trees and hedges, these would be retained wherever possible. Potential ecological impacts as a result of disturbance to bats can be mitigated through careful design and other specific measures. There were no objections to the application for ecological, landscape or arboricultural reasons;
In summary, the loss of open countryside and agricultural land does not significantly or demonstrably outweigh the significant benefits the proposed development would deliver.
We therefore seek that this site is allocated in the Wiltshire Housing Site Allocations Plan.

Attached files (Please see Objective)	4731454
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our client has recently had an application refused and is the subject of an appeal. The site is a sustainable extension to Westbury and we consider that the site should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.

Comment ID:	2588	Consultee Mr R Nevill	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133494	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission Site - Widham Farm, Purton		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		There is a neighbourhood plan progressing for Purton and we made representations to the Regulation 14 consultation. Those representations are attached and we do not repeat them here as they demonstrate the need for additional sites in Purton and the suitability of Widham Farm.			
Attached files (Please see Objective)		4731454			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Our client has recently had an application refused and is the subject of an appeal. The site is a sustainable extension to Westbury and we consider that the site should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.			

Comment ID:	2589	Consultee Mr R Nevill Person ID: 1133494	Agent Mr Stephen Harris Director Emery Planning Person ID: 389561	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Omission Site - Lower Woodshaw, Royal Wootton Bassett			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As set out in the introduction to this statement, we seek the allocation of our client's site at Lower Woodshaw Farm for development. The site would provide the opportunity to deliver a sustainable development in accordance with the Framework for the following reasons. Paragraph 7 of the Framework states that there are three dimensions to sustainable development: economic, social and environmental. The social role means: "supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well being."</p> <p>The proposed development would meet this role by delivering around 260 open market and affordable homes to meet housing needs in Royal Wootton Bassett and Wiltshire. It would also assist in delivering a five year supply of housing land and flexibility to meet the overall requirement in the plan period.</p> <p>The Royal Wootton Bassett Neighbourhood Plan (RWBNP) does not recognise that there is a need to provide additional housing land now to meet Wiltshire's five year housing land supply requirement. As set out above, Wiltshire Council's 5 year supply is precarious and therefore additional sites are needed in the short term to meet the deficit, and this is likely to necessitate additional sites coming forward in the Market Towns.</p> <p>A further practical effect of the housing land supply position is that all policies relevant to the supply of housing will be automatically out of date, by the operation of Framework paragraphs 47 and 49. This also necessitates further sites to be brought forward.</p> <p>Being located adjacent to the settlement boundary of Royal Wootton Bassett, our client's site is well located in terms of accessibility. In particular, it is in close proximity to the Interface Business Park, which provides a range of employment opportunities. There is also a pub (Woodshaw Arms) and a supermarket (Tesco Express) in close proximity to the site. Open space (including a Local Equipped Area of Play) would be provided on site. Should a railway station be developed at the Interface Business Park, which is one of the potential locations put forward in policy 14 of the RWBNP, the site would be within close proximity to this. Indeed as stated above, an allocation at our client's site could assist facilitating the railway station in this location.</p> <p>Paragraph 7 of the Framework explains that the economic role means: "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and co-ordinating development requirements, including the provision of infrastructure"</p> <p>During the build programme, construction related jobs and indirect jobs would be created. This would benefit local contractors and suppliers. Once occupied, the proposed development would help contribute to ensuring the Borough has a stable workforce in terms of ability and age. The residents of the scheme would spend money in Royal Wootton Bassett and other towns in Wiltshire. The proposed development</p>				

	<p>would therefore generate significant spending in the Borough, which would help create full time jobs in the local retail and leisure sectors. In addition, the proposed development would deliver a New Homes Bonus and Council Tax income for the Council.</p> <p>Paragraph 7 of the Framework states that the environmental role means: “contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimize waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”</p> <p>The allocation of our client’s site would result in the loss of open countryside. However the Council is relying on large sites in the open countryside to meet its housing requirement to 2026 across the Borough.</p> <p>In terms of flood risk, the site is located within an area identified in the Core Strategy (policy CP67) as being at risk of flood. However, an indicative layout for the site has been drafted, which includes a flood storage area to the south west of the site. Flood risk issues can therefore be mitigated.</p> <p>Access would be taken from the access road to the Interface Business Park to the west of the site. Two access points are proposed on the indicative layout plan. A Transport Assessment would be prepared to assess the impact the proposal would have on the highway network.</p> <p>In terms of trees and hedges, these would be retained wherever possible, Most of the existing trees and hedges are located on the boundaries of the site, but there is a line of trees and hedges, which bisects the site in two. This would be retained in the proposed layout of the scheme.</p> <p>In terms of other environmental considerations, including: agricultural land, landscape and visual impact and ecology, these would be addressed through the design and detailed reports would be provided in support of a planning application.</p> <p>In summary, the loss of open countryside and agricultural land does not significantly or demonstrably outweigh the significant benefits the proposed development would deliver. Therefore, the presumption in favour of sustainable development applies and we seek the allocation of the site in the RWBNP.</p>
Attached files (Please see Objective)	4731454
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our client has recently had an application refused and is the subject of an appeal. The site is a sustainable extension to Westbury and we consider that the site should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.

Comment ID:	2590	Consultee Mr Michael Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1133523		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In terms of flooding risk the displacement of natural slow drainage (mainly farming land) on the southern side of the A3094 would further impact on the river Nadder and fields on the northern side of the road that are frequently under water most winters. Any further increase to these levels could affect residents living on the meadows estates further to the east of the floodplain, the town path and the Cathedral.</p> <p>In view of comments made earlier at para 6 the most mitigating factor towards assisting the traffic situation would be a bypass for Salisbury particularly for the A36 but the problem of a higher risk of flooding would remain.. The only glimmer of light is to build a much smaller number of houses on the plot of land on the southern side of the A3094 next to the Wellworthys residential development which has just one "cash and carry" building on it. This area was previously earmarked for industrial retail units (mainly car sales) moving from the Churchfields Industrial estate. This proposal was declined and hence only one building is on the site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2591	Consultee Mr Michael Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1133523		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The application takes no account of the local environment. This involves serious current issues over flooding, pollution and the lack of a viable roads system needed to assist in such a large proposed housing development.</p> <p>The A3094 is regularly congested at both the Wilton junction with the A36 and the gyratory at New Bridge Road where it connects to both the A354 (Blandford) and A338 (Bournemouth) roads. The A3094 up to a few years ago was a B road but now also bears the brunt of the A36 traffic much of it heavy goods vehicles passing over two narrow bridges alongside Wilton Park wall turning left on to the A36 towards Wilton with great difficulty due to the 45 degree angle.</p> <p>Despite the urgent need for additional housing most local people would not benefit as local salaries are comparatively low due to the lack of large commercial employers in the area. Thus future occupants are more likely to be from higher priced areas and willing to commute long distances to work adding to the already overburdened traffic situation.</p> <p>In view of comments made earlier at para 6 the most mitigating factor towards assisting the traffic situation would be a bypass for Salisbury particularly for the A36 but the problem of a higher risk of flooding would remain.. The only glimmer of light is to build a much smaller number of houses on the plot of land on the southern side of the A3094 next to the Wellworthys residential development which has just one "cash and carry" building on it. This area was previously earmarked for industrial retail units (mainly car sales) moving from the Churchfields Industrial estate. This proposal was declined and hence only one building is on the site.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2592	Consultee Mr Paul Chartier	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 481059	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraph 5.13 / Table 5.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Together with others in the parish, I am pleased to see that the Wiltshire Housing Site Allocations Plan recognises that Sutton Benger has taken more than its fair share of housing development in recent years, there are still some approved developments that will add to the load on the parish.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2593	Consultee Mr Malcolm Read	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 394962		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On no account should any development be permitted to the north of the Netherhampton Road to the west of West Harnham. Apart from the obvious traffic objections being raised by local residents, this land is the floodplain of the River Nadder, after it has been boosted by the River Wylde, which in turn has been boosted by the River Till.</p> <p>Various hydrological and hydraulic studies may show that, for example, some small areas of this land may be slightly higher than a 100 year flood map, but determining what constitutes a 100 year flood flow (which leads to the flood map) is quite arbitrary in the first place, as I learned from being the lead objector on hydrology at the 1993-4 Salisbury Bypass Inquiry. Not only that but it is much easier to defend a floodplain from development if there is a clearly defined boundary, such as the Netherhampton Road on one side of Salisbury, and the A36 on the other side, (in respect of the Avon floodplain). Failure to defend clear floodplain boundaries will result in development nibbling away at the floodplain until very little is left, which would be absolutely catastrophic for flooding in the City.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I trust this is helpful, and perhaps I should mention that I was a member of Salisbury District Planning Committee from 1981- 1989, and I would gladly take part in any examination in public in this matter.				

Comment ID:	2594	Consultee Mr Malcolm Read	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 394962		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My other very strong objection is that the land to the north of the Netherhampton Road is a vital part of what remains of the City's landscape setting. The road from Sparsholt village into Winchester is a beautiful example of town meeting country, with no internally illuminated signs or any other signs of commerce. The Netherhampton Road into Harnham is the last example of this as far as Salisbury is concerned.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I trust this is helpful, and perhaps I should mention that I was a member of Salisbury District Planning Committee from 1981- 1989, and I would gladly take part in any examination in public in this matter.				

Comment ID:	2595	Consultee Mrs Rosemary Sims	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899448		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to register my objections to the proposed building of 200 houses on the land East of Elizabeth Way. They are as follows: The roads are already strained with traffic from Paxcroft Mead Developments, as there are only 2 (two) routes out of Trowbridge to Bath via Bradford on Avon & Staverton. Both of which have narrow bridges, in Bradford's case narrow streets, none of which were built to take the amount of traffic that they presently do. Staverton Bridge was strengthened some years ago, but the amount of traffic has increased substantially since then & should this proposal go ahead even more traffic would add to the mix! Twice a day Trowbridge is "gridlocked" with traffic, Staverton also has traffic jams at peak times. How much longer can the bridge there cope with the amount of traffic that is steadily increasing? Heavy lorries plus cars etc. The road system has not been considered when all this housing has been built or is under consideration. So planners, give the rest of Wiltshire a share of equal housing, sort out the "eyesores" in the county town and make Trowbridge a more attractive place again!!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2596	Consultee Mrs Rosemary Sims	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899448		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to register my objections to the proposed building of 200 houses on the land East of Elizabeth Way. They are as follows: When is the Bowyers site going to be redeveloped? Surely housing should be under consideration? The approach to Trowbridge is a total disgrace!! As you come over the railway bridge and down to the town bridge the "Eyesore" that is Bowyers plus the derelict garage are a total disgrace to the county town of Wiltshire! The town centre is no better!! With empty shops along Silver Street it's taking on the appearance of a ghost town!!! DISGUSTING. All this space could and should be considered long before building on "green belt" is even thought about. So planners, give the rest of Wiltshire a share of equal housing, sort out the "eyesores" in the county town and make Trowbridge a more attractive place again!!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2597	Consultee Mrs Rosemary Sims	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899448		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I wish to register my objections to the proposed building of 200 houses on the land East of Elizabeth Way. They are as follows: The fields under consideration are very prone to flooding in winter or even any time of year when heavy rain occurs, it's not called "Hilperton Marsh" for nothing!!! I know several residents of Wyke Road whose houses are adjacent to the stream, whose houses have flooded and they are very concerned about the risk of flooding in the future should the development go ahead. The fields either side of "the road to nowhere" i.e. Elizabeth Way every year are flooded at some point and remain extremely wet and "boggy" for at least four months of the year (winter time). The small brooks that traverse the land could not cope with the flow-off from any development. So planners, give the rest of Wiltshire a share of equal housing, sort out the "eyesores" in the county town and make Trowbridge a more attractive place again!!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2598	Consultee Mrs Rosemary Sims	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899448	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my objections to the proposed building of 200 houses on the land East of Elizabeth Way. They are as follows: I think Trowbridge has done more than its fair share of house building. Why can't the rest of the county have a fairer allotment of housing spread out across other towns and villages?? So planners, give the rest of Wiltshire a share of equal housing, sort out the "eyesores" in the county town and make Trowbridge a more attractive place again!!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2599	Consultee Mrs Rosemary Sims	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899448		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my objections to the proposed building of 200 houses on the land East of Elizabeth Way. They are as follows:</p> <p>The Wildlife!! We have in these fields, Buzzards, Red Kite, Kingfisher and heron beside the brook, the buzzard seems very at ease with “humans” and sites on fences til we get quite close before taking off! Quite a splendid sight at close quarters, also deer and the usual badgers, foxes and bats are at home here. Should all this be lost or “sacrificed” in the name of ‘progress’?? Once it’s gone it can never be replaced, what a legacy for our children and grandchildren!! The government recommend us all to take more exercise, what is more appealing, soulless streets or our ‘green and pleasant lands’?? I know which I prefer as do many others!!</p> <p>So planners, give the rest of Wiltshire a share of equal housing, sort out the “eyesores” in the county town and make Trowbridge a more attractive place again!!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2600	Consultee Mrs Rosemary Sims	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 899448	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my objections to the proposed building of 200 houses on the land East of Elizabeth Way. They are as follows: There is one other question, with all this development going on, or proposed, where are the extra doctors, dentists we need?? It's all very well having a "posh" new health health centre, but we have no hospital! Which I would have thought more vital! Not everyone has the means or transport to 'trot off' to Bath to the already stretched R.U.H. I was born 73 years ago. I have lived in Hilperton for 50 years I have seen Trowbridge spread out in all directions but the amenities have not kept up with all this development. True, we have a cinema complex at last but what is there for the youngsters to do?? Something else I feel very strongly about! A subject for another time! So planners, give the rest of Wiltshire a share of equal housing, sort out the "eyesores" in the county town and make Trowbridge a more attractive place again!!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2601	Consultee Mr John Dovey Retired	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133628	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Clause 5.137 states that 'The bridleway leading from the site is likely to be a key route for people walking or cycling from the site connecting to the Old Shaftesbury Drove and into Harnham Being very familiar with the area this will not happen. This route is both far longer and requires riding/walking up long steady gradients when travelling in either direction unlike the direct route along Netherhampton Rd and across the Town Path which is absolutely flat. Amend sentence to read 'the site is connected to the Old Shaftesbury Drove by a bridleway'</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2602	Consultee Mr John Dovey Retired	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133628	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Bullet point no 6 states ' All built development to be located below the 75m contour'</p> <p>Clause 5.129 states 'All built development will be below the 70m contour'</p> <p>Although more desirable for all development to be below 70m contour given the area of lanf lying between the 70m and 75m contours it is doubtful whether the proposed development could be accommodated below the 70m contour. Reluctantly I would suggest that Clause 5.129 be amended accordingly</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2603	Consultee Mr John Dovey Retired	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133628	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 & H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is no reference to the ready availability of main services . It is believed that services were brought out from the city to the city boundary and hence the boundary marks the 'head' of the services i.e. those pipes/cables with least capacity which may/may not be adequate to serve an additional 700+dwelling plus industry.</p> <p>Undertake a 'Utilities Assessment' to confirm that the existing utilities in Netherhampton Rd are capable of supporting the proposed developments.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2604	Consultee Mr John Dovey Retired	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133628		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Bullet point no 3 states that a new primary school will be provided, however, there is no reference to the provision of additional secondary education.</p> <p>Consideration to be given to extending the existing primary school located centrally in Harnham and which already has all of the required external works e.g. fencing, gates, playgrounds, playing field, mains service connections and could be extended in stages as and when the need dictates</p> <p>An 'Education Assessment' to be prepared for whole of Salisbury and South Wilts to determine the total number of student places required for all ages and abilities of students on completion of the Housing Plan.</p> <p>A fully costed Option Study to be undertaken to determine whether best value for money is realised by either:-</p> <p>a) Constructing a new primary school, or</p> <p>b) Extending the existing primary school</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2605	Consultee Mr John Dovey Retired	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133628		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.67			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Having lived in Harnham for in excess of 60 years it is clear that businesses are very reluctant to move to the South of the City; the Wellworthy Site was transferred to housing and the Booker site remains vacant. Therefore, although an admirable objective the reality is that industry will not move Churchfields to Harnham at any point in the future and the plan should be amended to both recognise and be open with regards to this. The plan should clearly state the maximum number of additional dwellings which would be built on this site if the sought for move of industry from Churchfields to Harnham fails to materialise.</p> <p>If industry is reluctant to move to the areas of housing consideration should be given to locating the housing closer to the industrial sites where arguably better infrastructure facilities already exist.</p> <p>In particular consideration should be given to further expansion between Salisbury and Amesbury given that Boeing have announced major expansion plans for Bascombe Down and major expansion is planned at the Parton Science Park.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2606	Consultee Mr John Dovey Retired	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133628	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Although it is noted that a Transport Assessment will be prepared it is to be noted that if industry fails to move to Harnham all workers and students together with those undertaking 'the school run' from beyond the immediate vicinity will need to travel along the A3094 which is already running at its design capacity - approx 14,000 vehicles and we are advised in the Salisbury Transport Strategy that both the Harnham Gyratory and Park Wall junctions are operating at full capacity and that improvements to either of these junctions will naturally increase traffic flows due to being easier to negotiate - and that is before the effects of building at least a further 700+ dwellings are taken into account. It is noted that there is no mention of a shop being provided on site and therefore it is likely that residents will choose to shop in Salisbury, a major centre, thus adding to the number of vehicles negotiating the Harnham Gyratory. Increased delays and environmental pollution are therefore inevitable contrary to Sustainability Objectives Nos 4 & 5.</p> <p>Attention is drawn to the fact that in 2011 a proposal to construct 400+ dwellings on this site was rejected and one of the reasons for the rejection was 'traffic congestion' in Netherhampton Rd. It is difficult therefore to understand how the construction of 700+ dwellings can be considered acceptable.</p> <p>Emphasise that Master Plan MUST include ALL infrastructure improvements including both those local to the sites in question, and also those required further away e.g. Harnham Gyratory and Park Wall junction and that all improvements are implemented and completed BEFORE any development of the Harnham sites is undertaken.</p> <p>It is particularly important to consider the infrastructure requirements of the wider area because the Netherhampton Rd South site has been sited on the line of the Southern By-Pass - proposed and rejected in the 1990s. There does not appear to be any other suitable Southern By pass route should this matter be resurrected.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2607	Consultee David Goodship	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133638	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to record my objections to the draft CATP for Trowbridge, within the formal consultation period 14th July to 22nd September 2017.</p> <p>Trowbridge Community area</p> <p>Para 2.2 states that Core Policy 29 (CP29) requires approximately 7,000 new homes to be provided in the Trowbridge Community area, however this does not reflect The Planning Inspectorate Report of the Wiltshire Core Strategy (WCS) which recognises this 7,000 as only indicative within disaggregation across the three Housing Market Areas.</p> <p>Furthermore Para 2.2 does not explain or justify the vast imbalance between approximately 5,000 houses for the Chippenham Community Area & 7,000 houses for Trowbridge. This is almost 50% extra for Trowbridge, yet both towns are similar in size, with Chippenham enjoying significantly superior transport links (Rail & Motorway) to the major areas of employment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2608	Consultee David Goodship	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133638	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Para 2.9 recognises the delay in securing planning permission @ Ashton Park, therefore Wiltshire Council needs to be proactive in re-developing the numerous Brown Field Sites (many of which are owned by the council) within Trowbridge, & also rebalancing the disparity between Trowbridge & Chippenham. These actions would prevent the development of grasslands surrounding Trowbridge, which currently provide open countryside between it & small villages. The proposed development of Site 3565 Southwick Court by Waddeton Park agent Savills is a prime example, as its' development would merge Southwick with Trowbridge & be contrary to the WCS.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2609	Consultee David Goodship	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133638		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Appendix G, Page 27 - Site 3565 Southwick Court - Accessibility</p> <p>The plan identifies & I quote "Potential vehicle, pedestrian & cycling routes through existing built form to the immediate north on to Silver Street Lane". To use Sandringham Rd for access would require building a road through the communal open space & historic protected hedgerow & a bridge across the brook.</p> <p>This access would be in breach of the original planning approval & conditions for the Home Farm Development in 1971, which stipulated:-</p> <p>(1) "The area of land shown edged green on the approved plan shall be reserved /or communal open spaces purposes, & shall be satisfactorily maintained by the Trowbridge Urban District Council/or such purposes".</p> <p>(2) "Existing hedges & trees on the site shall be maintained".</p> <p>This open space which contains mature trees, & has provided a safe recreational area for local adults & children for over 40 years would be destroyed.</p> <p>A conservative estimate of the increase in vehicle movements is 900 a day (180 x 2.5 cars per house x 2 journeys/day + deliveries). Therefore the impact of this 4 fold increase in vehicle traffic would devastate the environment & safety of the current neighbourhood, & completely change the character of a quiet culde-sac into a very busy thoroughfare.</p> <p>The obvious access to the proposed Southwick Court development is from the main A361 road which borders the site, or through land at Upper Studley (Site 3260).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2610	Consultee David Goodship Person ID: 1133638	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.48			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Appendix A, Trowbridge - Proposals for Revised Settlement Boundaries On the large map (page 27) @ Grid References G9 & G10, (please see annotated extract below) the proposal is to move the boundary (Blue line) from currently being the brook, & to sever the end 65 metres of Sandringham Road & then continue along to Balmoral Rd (Red Line) The justification for this proposal is claimed to be in line with the Topic Paper 1: Settlement Boundary Review Methodology (TP1: SBRM) and explained in Table A 1, 2nd Row & I quote "Amend boundary to remove area more closely related to the countryside". This proposal completely ignores the natural run of the brook & hedge/trees & moves away from "a clearly defined physical feature", & is contrary to the criterion in TP1: SBRM. Also this grassed Public Open Space is part of an integrated series of grass open spaces allocated in 1971 (as part of the original planning consent) that encompass the Home Farm Housing Development. Furthermore the draft of the TP1: SBRM was revised to specifically include & I quote "Recreational or amenity space at the edge of a settlement that relates more closely to the built environment". Hence if this grassed Public Open Space was currently not within our settlement boundary it could be included following the methodology in TP1: SBRM, because it is not agriculture land as the adjacent countryside, & the grass & trees are maintained by the local authority. Therefore TP1: SBRM does NOT support a revision of our boundary, & it should remain unchanged. Finally with the proposal to build 180/237 houses in the countryside (Site 3565 - Southwick Court) immediately on the other side of the current boundary (Blue Line), the countryside could be no more! Therefore moving this open space out of the housing development is totally illogical. I trust you will consider my objections carefully, recognize their logic & make the necessary changes to the draft CAPT for Trowbridge.				
Attached files (Please see Objective)	4731760				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2611	Consultee Dr Nigel Knott Person ID: 1133677	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.40			Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The former Bell Inn, at Appendix 3 grid squares G8 and F8, is a Grade II listed building. The extended western car park of this property has been included within the settlement as part of the proposed boundary change. If the proposed boundary change was to stand this would facilitate future unnecessary and unwanted housing development of the car park in proximity to a Grade II historical asset. This would be in opposition to the policies of Seend's emerging neighbourhood plan. Within that plan this land relates to, and facilitates, a designated significant view within a landscape gap from Seend to the open countryside to the south west of the Seend settlement. The Seend Parish Neighbourhood Plan Landscape Analysis Map shows the identified view in that landscape gap. Public consultation on the landscape element of the Seend neighbourhood plan has already taken place. Allowing the proposed change to stand will undermine the value of neighbourhood planning and create unnecessary boundary amendment work for both Wiltshire Council and the neighbourhood plan steering group.</p> <p>The extended area of the former Bell Inn car western park should be excluded from the proposed boundary change and the existing boundary line retained. Boundaries will remain subject to review and parishioner support within the ongoing process of the Seend neighbourhood plan. Local engagement from people who know the settlement supersedes the weak desktop methodology for determining the built environment of Seend. In the case of Seend, doing nothing in terms of boundary change will keep the site allocations plan compliant.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2612	Consultee Mr & Mrs Phill & Trish Marchant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Why has Trowbridge got to provide land for 700 extra dwellings, when planning has been given for 5,096 which the developers have not used? We have lived in Trowbridge for only ten years but have watched with concerned amazement the number of new houses that have been built on what used to be open countryside.</p>				
Attached files (Please see Objective)	4731935 / 4731934				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2613	Consultee Mr & Mrs Phill & Trish Marchant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The extra traffic will be a problem for the town. Most homes have at least two vehicles and The Trowbridge Traffic Model (June 2011) concluded that the extra noise and pollution would mean cycling or walking would become unattractive, and the viability of Trowbridge as an attractive place to live and work would become less viable.</p> <p>Living in Church Lane we are most concerned about site 1021. We have had several accidents between Church Lane and the entrance to Southwick Country Park along the A361 and feel extra junctions would only add to the danger.</p>				
Attached files (Please see Objective)	4731935 / 4731934				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2614	Consultee Dr Nigel Knott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133677		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The desktop methodology for determining necessary boundary changes in Seend is understood but there are inconsistencies in application and an apparent lack of knowledge on actual land use. The Seend Lye Recreation Field (SLRF), now excluded from the Seend large village settlement by the proposed boundary change, has been part of the settlement since the 1960s. The SLRF is enclosed on three sides by the built environment of the settlement. The SLRF has constructed upon it a cricket pitch, 2 x tennis courts, a children's play area, an equipment store and a concrete pad for cricket net practice. All of these features are said, by the methodology, to be "more related to the open countryside" than the settlement. This is patently not the case due to the very recreational nature and physical location of these facilities. Furthermore, when standing on the SLRF one has the sense of being in the settlement and not in the open countryside or anywhere related to the open countryside. Similarly, in the case of the WI allotments, in Appendix 3 map grid H6, the well-used allotments are bounded on west, east and south sides by the built environment. To the north, about half the boundary abuts an open field and the built environment to the east extends well north of that northern boundary. Again, there is a sense that one is on land within the settlement and not on land more related to the open countryside. The change necessary to achieve consistency and accuracy is to do nothing and leave the Seend settlement boundary unchanged but subject to review by the forthcoming Seend Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2615	Consultee Mr & Mrs Phill & Trish Marchant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Site 1021 is a flood plain for Lambrok Stream. We have witnessed water erupting 3 feet in the air when the drainage pipe through the field has been unable to cope with the volume of water. The Lambrok Stream overflows its banks regularly, (photos enclosed) and if dwellings are built on this site and also upstream at Southwick Court and Upper Studley, it will exacerbate this. The Pitt report, 2008, states flood plains should only be built on if no other land is available and the need is great. We are aware that the plan says provision would be made by the developer to deal with this, but are sure a similar undertaking was made when 24 and 26 Church Lane were built on land that used to be an orchard uphill from the stream. If you were to walk along the footpath between Church Lane and Acorn Meadow after rainfall you would need your wellies! The surface water run off from Churchfields and Church Lane no longer run into the drainage ditch alongside the field as the end of it was filled in by the builder, probably not deliberately, just ignorantly.				
Attached files (Please see Objective)	4731935 / 4731934				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2616	Consultee Dr Nigel Knott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133677		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In the case of the WI allotments, in Appendix 3 map grid H6, the well-used allotments are bounded on west, east and south sides by the built environment. To the north, half the boundary consists of an open field and the built environment to the east extends well north of that northern boundary. There is a sense that one is on land within the settlement and not on land more related to the open countryside. The boundary change methodology therefore does not stand scrutiny</p> <p>The Seend Lye Recreation Field (SLRF), now excluded from the Seend large village settlement by the proposed boundary change, has been part of the settlement since the 1960s. The SLRF is enclosed on three sides by the built environment of the settlement. The SLRF has constructed upon it a cricket pitch, 2 tennis courts, a children's play area, an equipment store and a concrete pad for cricket net practice. All of these features are said, by the methodology, to be "more related to the open countryside" than the settlement. This is patently not the case due to the very recreational nature and physical location of these facilities. Furthermore, when standing on the SLRF one has the sense of being in the settlement and not in the open countryside or anywhere related to the open countryside. The Seend WI considers that both recreational areas, the WI Allotments and the SLRF, must be retained as part of the Seend settlement, within the settlement boundary.</p> <p>The change necessary to achieve consistency and accuracy is to do nothing and leave the Seend settlement boundary unchanged but subject to review by the forthcoming Seend Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2617	Consultee Mr Chris Crowther Person ID: 1113716	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to highlight my concerns on the sound component of this plan from the perspectives of evidence and track record.</p> <p>Evidence. I attended the consultation on 26 July where I spoke with the team and reviewed the documentation. To me, it was clear that the plan lacks effective justification. In sum, it is a strategy based on the premise of “build it and they will come”.</p> <p>When I asked to see the modelling that had taken place to show the load on the infrastructure and the environment, the team were unable to show it to me. Similarly, the coverage in the plan lacks the necessary depth. I have lived in the area for some time and have seen the implementation of previous plans so I have first hand experience of their failure.</p> <p>There is an equal lack of detail in the guarantee of securing additional employment to come to the area in the aftermath of building additional houses. Wiltshire has become a commuter region and those with the necessary means will relocate if the lack of detail in this plan begins to look like a ghetto-isation of Trowbridge and Wiltshire. In sum, the lack of evidence of employers seeking to relocate to this part of the world makes me feel that this strategy is a repeat condemnation for the county similar to the aftermath of the closure of the Mills.</p> <p>A simple example of this lack of detail is the fact that much of the commercial and industrial space around Trowbridge lies empty but yet the plan insists on building more.</p> <p>Track Record. I have lived in the Trowbridge / West Ashton area for 6 years now and see the annual transformation of that land into a lake that slowly metamorphosis to a pond followed by a swamp before drying up for the Summer. In that time, I have also witnessed the repeated efforts of the various building contractors to “get it right” as they have to return time and again to repair or re-engineer various works to keep nature at bay.</p> <p>I enclose some email correspondence between myself and the Council from May 2014 enquiring about the delays in building a “simple” roundabout near to Castle Mead. From memory, that simple task took 4 months. You can see from the email trail that the necessary levels of QA are not in place and I am not convinced that anything will have changed in the interim.</p> <p>My beliefs are further reinforced from the Consultation when I see that the Plan seems fit to build on Level 3 Flood areas – see attached photo from the consultation session. Again, given my first hand experience of the number of attempts that it took to get the drainage right for Green Lane, I question the track record of this decision and its implementation.</p> <p>My fears are only heightened because there is a noticeable gap in any detailed modelling and evidence within any of the plans.</p> <p>In order to make the Plan justifiable and effective, it is necessary to provide the following:</p> <p>Detailed modelling of the impact in the following domains:</p> <ul style="list-style-type: none"> Economic Infrastructure Environmental <p>The results of these detailed investigations should set the basis of what is in “the art of the possible” and avoid a more fanciful “build it and they will come”.</p>				

	Confidence will also increase if there is a coalition of the willing . It would be a real vote of confidence for the Planners to enlist the explicit support of potential employers by committing to come to Trowbridge and Wiltshire to fill the new spaces that will be created.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2618	Consultee Mr & Mrs Phill & Trish Marchant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Southwick Country Park is a well used amenity. Many people in wheelchairs and mobility scooters, mothers with pushchairs, dog walkers and people trying to improve their fitness. If that side of the stream is left to take the excess water it would mean the area known as Lambrok Meadow would be unusable for a good part of the year.				
Attached files (Please see Objective)	4731935 / 4731934				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2619	Consultee Mr Alasdair Jones-Perrott Estate Manager Longford Estate Person ID: 900160	Agent Mrs Alison Whalley Associate Planner Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	D3 (Salisbury CATP)				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The Wiltshire Housing Site Allocations Plan Pre-Submission (Regulation 19) draft plan (WHSAP) was published for public consultation on Friday 14th July 2017, the consultation runs until Friday 22nd September 2017.</p> <p>These representations are submitted on behalf of Longford Estate and relate to the allocation of sites and the resultant housing land supply in the Southern Wiltshire Housing Market Area.</p> <p>The WHSAP is a daughter development plan document to the adopted Wiltshire Core Strategy (2015) (WCS). The WCS set out minimum housing requirements for each of the three Housing Market Areas in the County.</p> <p>Wiltshire Council published a Housing Site Allocations Informal Consultation in February 2015. Included within this was a Plan identifying "Potential Site Options". The Council's Site Identification Process involved removal of sites with strategic policy concerns, including land within Flood Zone 2 or 3. As a result of several discussions with Wiltshire Council policy officers in August 2014 through to the publication of the Informal Consultation regarding the deliverability of the site, Site 3435 was included as a Potential Site Option (see Appendix 1). The site is referred to as SAL2 (and erroneously includes the neighbouring rugby fields).</p> <p>The Stage 2(a) assessment contained within the Salisbury Community Area Topic Paper has clearly not taken any of this technical information into account, which has led to its unreasonable exclusion from the site selection process. The details of the errors are set out in the representation form relating to Table D.3.</p> <p>The Stage 2a assessment is based on a series of "exclusionary questions" which are set out at Table D.2. We do not object to the principle of the methodology, however the approach taken to question 5 ("Is the site fully or partly within flood risk areas, zones 2 or 3?") is inflexible and has resulted in errors which has consequently led to the removal of Site 3435 (Land off Britford Lane) from the assessment at this stage. Indeed, the Informal Consultation published in 2015 included Site 3435 where other sites had been excluded for falling within Flood Zone 2 or 3.</p> <p>Furthermore, the assessment makes an uninformed and incorrect assumption of the highway capacity of the 'main road' (Newbridge Road), using this as a reason to remove the site from further assessment. There is a major inconsistency in the approach taken to the site assessments and we detail below the specific errors in the approach taken to assessing site 3435 (Land of Britford Lane):</p> <p>First, a small area in the north-western corner of Site 3435 (Land off Britford Lane) falls within Flood Zone 2 (not Flood Zone 3 as incorrectly stated in Table D.3 of the Salisbury Community Area Topic Paper - page 47). Consequently, the site has been given a "P" for "Partly". The vast majority of the site falls within Flood Zone 1. No development would be proposed within Flood Zone 2, the entirety of the ownership of the site was included within the red line for clarity. We have prepared a planning application for this site and no development is proposed within Flood Zone 2. The proposed development of the site for residential use has been discussed with strategic and planning policy officers of Wiltshire Council since 2014. Masterplans have been presented including a detailed package of technical information which specifically excludes the Flood Zone 2 area from development. The detailed package of information (titled "Response to Draft Wiltshire Housing Site Allocations Plan") is included as Appendix 2 to this submission. We refer the Inspector to Section 5 of Appendix 2 which outlines the flooding and drainage issues relating to the site, including a surface water drainage strategy.</p>			

In light of the amount and detailed level of information made available to officers over recent years, this would have been apparent and should have factored into the consideration of the site.

Second, the assessment assumes the 'Remaining developable site capacity' to be 45. As mentioned above, a large amount of technical information has been given to the Council, and a number of meetings held which concluded in agreement that the site could accommodate 100 dwellings (excluding the land within Flood Zone 2). This is evidenced on the masterplan included at Appendix 2.

Third, Table D.3 identified the site as being available, but not developable. There is no explanation for this. Longford Estates has invested significant resources, time and money on demonstrating that the site is indeed developable. All technical aspects of developing the site have been carefully assessed and the findings shared with Wiltshire Council. Furthermore, we believe that the site can accommodate 100 dwellings which is based on detailed site feasibility studies. This is more than double the 45 dwelling capacity set out in Table D.3.

Fourth, Table D.3 states that "The main road is unable to take additional traffic from this development". There is no evidence provided in the Topic Paper to justify this assertion. Detailed transport information was been provided to the Council (see Appendix 2) which demonstrates that the highways impact would be acceptable. Notwithstanding this, any major residential development south of the River will arguably generate additional traffic on the same main road referred to in relation to Site 3435 (New Bridge Road and the 'Harnham Gyration') would be impacted by development along Netherhampton Road (draft allocation sites S1028 and S1027) and most sites located to the south of the city centre (draft allocation site 3272).

Fifth, an inconsistent approach has been taken to the Stage 2(a) assessment of sites. For example, the majority of site ref. 3554a falls within Flood Zone 2/3 yet was considered to be developable and taken to the next round of assessment.

To summarise, the assessment of Site 3435 (Land off Britford Lane) makes incorrect assumptions that are not justified by evidence. The inconsistent approach to site assessment is amplified by the fact that Wiltshire Council planning officers have been party to a number of meetings discussing the development potential of the site and have received a detailed package of technical information which demonstrates that the site can accommodate 100 houses in a highly sustainable location, bringing with it numerous material benefits including 40% affordable housing. A housing allocation at Site 3435 (Land off Britford Lane) would be consistent with one of the Core Planning Principles as set out in the NPPF at paragraph 17:

"Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision taking. These 12 principles are that planning should:

- Not simply about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."

Paragraph 4.63 of the WHSAP states that the South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire and confirms that Salisbury is the Principal Settlement within the HMA and it is intended to be the primary focus for development. Site 3435 (Land off Britford Lane) offers a deliverable, viable and available opportunity for housing to be developed within walking distance of the city centre and is achievable early in the Plan period.

Please see Appendix 2 for further details.

It is submitted that in order to make the WHSAP sound that Site 3435 be re-assessed in light of the technical information that has been provided to the Council regarding the capacity of the site.

The site is highly sustainable and deliverable that could be allocated to help address housing need.

Including Site 3435 as a housing allocation would ensure that the WHSAP is effective as it is deliverable within the plan period and would ensure that despite proposed changes made to the residual requirement in the Salisbury and Wilton Community Area (as set out in accompanying representations), the objectively assessed needs can be met before 2026.

Longford Estate request that the site is considered as an 'omission site' at the Examination as it is well placed to accommodate growth in order to meet local housing needs and support existing services and facilities and reduce the number of car journeys and pressure on the highway network in comparison with other proposed allocations further away from the city centre which would result in a heavier reliance on the car.

Attached files (Please see Objective)

4738360 / 4738363

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

We request that Site 3435 (Land off Britford Lane) be considered as an omission site at the Examination. We request the opportunity to explain the background to the site's promotion and its development potential and how its inclusion as an allocation would ensure the WHSAP is "effective" and therefore sound.

Comment ID:	2620	Consultee Mr & Mrs Phill & Trish Marchant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Twelve different types of bat, including the protected bechstein, have been noted on a survey commissioned by a neighbour to be flying over site 1021 between the Country Park and his garden. They apparently use an historic hedgerow. This must surely be preserved.				
Attached files (Please see Objective)	4731935 / 4731934				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2621	Consultee Councillor Richard Gamble	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 402716	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I refer to the response of Worton Parish Council to the Settlement Boundary Review (as outlined in the attached document) and wish to record my support for their request for no change to the existing boundary without direct consultation and consideration.</p> <p>The existing boundary is long established and reflects in many respects the historic settlement as defined by burgage plots etc. In addition, many of the proposed changes fail to accurately reflect the criteria defined in the settlement boundary review methodology document. For example, the school grounds (G6) and gardens (H6, I6 and J6) are certainly not “more related to the open countryside”. It would appear that the compiler was unfamiliar with the location and may not even have examined the aerial photography.</p> <p>Worton is in the process of preparing a Neighbourhood Plan and I have no doubt that responsible proposals will be made regarding the settlement boundary in due course if that is appropriate.</p>				
Attached files (Please see Objective)	4740743				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2622	Consultee Mr & Mrs Phill & Trish Marchant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133652	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Is there enough reservoir and sewerage capacity to serve all these extra homes? Hopefully this is all in hand but we would like to be assured that the developers won't squeeze more dwellings into the sites after planning permission has been granted.				
Attached files (Please see Objective)	4731935 / 4731934				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2623	Consultee unidentified client Land at Shotwell, Chippenham Person ID: 1137289	Agent Annie Gingell Assistant Planner Tetlow-King Planning Person ID: 1137295	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Tetlow King Planning submits these representations on behalf of our client in relation to the Wiltshire Site Allocations Pre-submission draft. Our client has an interest in land at Shotwell, Chippenham and would like to like to propose the site for allocation as site to develop C2 Care Home with significant facilities for dementia care. A site location plan is provided at Appendix A.</p> <p>Context</p> <p>The Local Government Association (LGA) published a report in September 2017 entitled ‘Housing our ageing population’. The report highlighted a distinct and urgent need to better provide a range of housing options to meet the wide variety of housing circumstances, aspirations and needs of people nationally as they age.</p> <p>The LGA indicated that between 2008 and 2039, 74% of projected household growth will be made up of households with someone aged 65 or older. We need to plan for the housing and care needs of the population as they age and the PPG says it is “critical” that we do so.</p> <p>Research carried out by property consultants JLL, published on the BBC website on the 1 August 2017, found that since 2002 an average of 7,000 new care home beds had opened in the UK every year but that even with this by 2026 there would be an additional 14,000 people needing care home places per year. In addition to this additional need there continues to be a significant rationalisation in care homes with older homes and unviable homes closing and new high tech homes, designed for higher dependency levels, opening. This proposal would be part of that process whereby the increase in older people, with increased levels of higher dependency, can be accommodated in a situation away from pressurised NHS beds.</p> <p>That BBC article included a quote from JLL lead researcher James Kingdom saying “We’re currently building half the number of care home beds every year that we need.”</p> <p>The Site and Surroundings</p> <p>The site at Chippenham covers 1.01 hectares of open countryside and is located in flood zone 1. The site is outside the Chippenham Community Area Boundary Limit set out in the Core Strategy and Chippenham Site Allocations Plan (CSAP); it is not currently allocated within the Core Strategy or CSAP; nor is it designated for any other purpose.</p> <p>The site is located to the south west of Chippenham and bordered to the north west by the B5428. The B5428 provides a direct route to Bath Road; a key arterial route in to Chippenham and the wider area.</p> <p>The site is currently surrounded by open countryside however, as illustrated in figure one; there are approved applications for development on three sides. The land to the north west of the site does not currently have a planning application but it is allocated in the CSAP as a smaller extension site for residential development under Policy CH1.</p> <p>Site History</p> <p>There is no planning history for the site though it is surrounded on three sides by developments with permission granted for various uses (see figure 1) [In attached document].</p> <p>Proposal</p>			

Our client would like to develop the site for the purpose of a Use C2 Care Home responding to the need in the area and an identified shortage of dementia care.

Planning Policy

The Development Plan for the site is comprised of the Wiltshire Core Strategy (adopted 2015). The Chippenham Site Allocations Plan (adopted May 2017) is also relevant.

Core Strategy

Core Policy 46 of the Core Strategy states that new housing, and housing schemes, to meet the specific needs of vulnerable and older people in “suitable locations” will be required in Wiltshire, and that such accommodation should be in sustainable locations where there is good access to services and facilities and an identified need. This is such a location.

The policy allows for such developments adjacent to Chippenham provided that there is (a) a genuine need; (b) environmental and landscape considerations will not be compromised; (c) facilities and services are accessible from the site; and (d) its scale and type is appropriate to the nature of the settlement and will respect the character and setting of that settlement.

We do consider that Policy 46 applies to this area and would welcome a discussion on this point.

Chippenham Site Allocations Plan

Policy CH1 of the CSAP deals with allocations to the south west of Chippenham and is comprised of the Rowden Park site and ‘Smaller Extension’ sites (identified in figure 2).

The Rowden Park site is identified in the CSAP is proposed for a mixed use development to include the following:

- 1,000 dwellings
- 18ha of land for employment (B1, B2, and B8 uses of the Use Classes Order) adjacent to the A350
- Land for a 2 Form Entry primary school
- A local centre
- Approximately 100ha as a riverside country park
- strategic landscaping and open space to retain and reinforce existing hedgerows and establish new areas of substantial planting

No more than 800 homes to be completed before the Cocklebury Link Road (from the A350 to Cocklebury Lane) is open for use or a set of comprehensive transport improvement measures of equivalent benefit.

Further to this, approximately 11ha of land is identified as part of the policy for residential development under ‘Smaller Extension’ sites. These will include:

- Up to 400 dwellings
- Strategic landscaping and open space, including the retention of important hedgerows, where appropriate, to provide a ‘soft’ urban edge to development.

Justification

The site is effectively an undeveloped, non-allocated island, surrounded by the South West Chippenham strategic allocation (Policy CH1), as illustrated by figures 1 and 2. It is evident that the development of a C2 Care Home would be acceptable in this location given that the strategic allocation is comprised predominately of residential uses.

The main impacts on the nearby listed buildings and landscape, ecological concerns, and relationship with Chippenham are all mitigated to a large degree by the site being physically wrapped up by the allocation and other neighbouring developments.

The allocation also increases our client’s sites sustainability by providing a range of facilities and services in the immediate vicinity, which would be easily accessible to residents and further reduce any negative impacts associated with the development on Chippenham.

ONS population statistics show that whilst 27% of Wiltshire’s population is 60 years or over, 49% of the borough is over 45 years old. It is therefore inevitable that there will become an increasing need for C2 accommodation in Wiltshire.

Evidently, it is increasingly important that the Council appropriately plans for an ageing population. Not doing so will mean an inadequate provision of care home accommodation and a lack of family houses being vacated which will have an effect on house prices and a detrimental impact on housing affordability and the ability of families to purchase in the area. A lack of care home beds and can lead to serious issues of bed blocking and increased social care costs.

	<p>The only reason we can see why this site was not allocated was because it was not promoted and the developers of all adjacent sites did not do any deal with the landowner. Building land and care development are two very important things and leaving this site as an island of no development would be incongruous and illogical.</p> <p>Summary</p> <p>It is our view that by allocating our client's site within the wider Wiltshire Site Allocations Plan (WSAP) should be considered and that a care home would be an appropriate allocation.</p> <p>Paragraph: 006 Reference ID: 12-006-20150320 of the PPG says that Local Plans should ensure that the policies in their Local Plan recognise the diverse types of housing needed in their area and, where appropriate, identify specific sites for all types of housing to meet their anticipated housing requirement. It goes onto say this could include, amongst other things care homes, and that such proposals can be allocated in plans. Failure to respond to identified need can be a serious issue for the progress of a development plan.</p> <p>The inclusion of the site would provide a much needed care element to the allocation, which it is currently lacking, whilst enabling the site to be positively integrated with the south west of Chippenham allocation in terms of meeting local community needs and traffic management.</p>
Attached files (Please see Objective)	4740815
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2624	Consultee Mr Martin Frayling	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2625	Consultee Paul Damsell Person ID: 1133656	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village.</p> <p>I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons:</p> <p>Issue No evidence of housing need for Yatton Keynell Details Appendix E of the Chippenham Community Area topic paper) confirms that no local housing needs survey was undertaken as part of the plan. The proposed dwellings should be justified with evidence that there is a specific local need. Relevant National Policy in conflict with paragraph 158 of the NPPF which states: 'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic , social and environmental characteristics and prospects of the area. Strategies for housing and other uses are integrated and they take into account relevant market and economic signals'.</p> <p>In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2626	Consultee Paul Damsell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133656		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village.</p> <p>I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons:</p> <p>Issue Lack of a Neighbourhood Plan Details At a Parish Council meeting back in November 2014 there was a call for a Neighbourhood Plan to be made so that residents can engage in how many and where future housing might take place. Relevant National Policy in conflict with Para 155 of NPPF In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2627	Consultee Paul Damsell Person ID: 1133656	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village.</p> <p>I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons:</p> <p>Issue Site selection process unsound Details Sutton Benger has an identified need and no housing has been allocated. Yatton Keynell has no identified need yet 30 houses are proposed Relevant National Policy in conflict with Para 159 of the NPPF</p> <p>In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2628	Consultee Paul Damsell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133656	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village.</p> <p>I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons:</p> <p>Issue Infrastructure issues Details Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area.</p> <p>In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2629	Consultee Paul Damsell Person ID: 1133656	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village.</p> <p>I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons:</p> <p>Issue Poor consultation Details None of the Parish Council's from the five villages in the Chippenham Community Area responded to Wiltshire Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement.</p> <p>Relevant National Policy in conflict with Para 155 of NPPF</p> <p>In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2630	Consultee Paul Damsell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133656		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village.</p> <p>I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons:</p> <p>Issue Proposal will have significant impact on the character of the area</p> <p>Details A large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area.</p> <p>In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2631	Consultee Mrs Ann Brown	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133661		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Previous planning applications for a smaller number of homes on the same site have been rejected; the reasons for rejection are still valid and should apply to the current proposal.</p> <p>The proposed density of housing is too high for the village and particularly unsuitable for the 'gateway' to the village from Westbury. Any 'additional screening' of the site would require land and therefore increase the density still further; the attempt to shield the development is likely to lead to a greater negative visual impact.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2632	Consultee Mrs Ann Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133661	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The B3098 is a busy road, especially during the morning and evening 'rush hour', as shown by a number of traffic studies, with road users increasingly travelling from Westbury via Bratton to the A350 in order to avoid the substantial queues at Yarnbrook. Houses opposite the proposed development give straight on to the road and cars have restricted visibility when turning out.</p> <p>The Westbury Community Area Topic Paper says that "a regular bus service exists connecting the village with Westbury and Trowbridge". Bratton has been fortunate to cling on to its bus service but there are only 6 buses per day, none on Sunday, and I have personal experience of timetables services failing to materialise with no warning and no explanation.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2633	Consultee Mrs Ann Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133661	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Westbury Community Area Topic Paper says that “a regular bus service exists connecting the village with Westbury and Trowbridge”. Bratton has been fortunate to cling on to its bus service but there are only 6 buses per day, none on Sunday, and I have personal experience of timetables services failing to materialise with no warning and no explanation.</p> <p>The school (with a ‘good’ Ofsted rating) currently has spare places but these would not necessarily be filled by children living in the proposed housing as there are many children living in Bratton who attend a nearby village school with an ‘outstanding’ rating in preference. Bratton doesn’t contain 819 dwellings but just over 500, a substantial difference. The addition of 40 houses therefore constitutes significant growth of the village requiring considerable improvement in infrastructure and putting further strain on the local surgery. The Bratton Parish Housing Requirement Survey in 2014 identified only a small shortfall in housing, which is capable of accommodation by infilling elsewhere in the village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2634	Consultee Mrs Ann Brown	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133661	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The school (with a 'good' Ofsted rating) currently has spare places but these would not necessarily be filled by children living in the proposed housing as there are many children living in Bratton who attend a nearby village school with an 'outstanding' rating in preference. Bratton doesn't contain 819 dwellings but just over 500, a substantial difference. The addition of 40 houses therefore constitutes significant growth of the village requiring considerable improvement in infrastructure and putting further strain on the local surgery. The Bratton Parish Housing Requirement Survey in 2014 identified only a small shortfall in housing, which is capable of accommodation by infilling elsewhere in the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2635	Consultee Mr Simon Jenvey Halsall House Person ID: 1133667	Agent Mr Tom Stanley Director Colliers International Person ID: 1133670	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	Omission site - land at Christian Malford			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Halsall Homes are a well-established family owned business forming part of the Shepperton Group, a property and development group based in Bath, whose history dates back to a pre- World War II era. Halsall Homes has a long history dating back to 1974. Halsall Homes build a range of high quality, desirable homes for open market sale throughout the region. They pride themselves on designing homes to complement their setting, incorporating a traditional style typical of the local area with character features and individual finishes. Halsall Homes has the expertise and financial resources to help deliver a high quality new housing development at Christian Malford.</p> <p>Site Context</p> <p>The site lies to the south east of the settlement of Christian Malford covering an area of 11.35ha of Grade 3 agricultural land. The site is approximately 4 miles north east of Chippenham, 19 miles east of Bristol, 17 miles west of Swindon, and 17 miles south of Cirencester. The site is located between Station Road, Orchard Leaze Lye Common and the Bristol main railway line which is raised. The north west corner of the site is bordered by residential development. The site benefits from two existing access points: one from Orchard Leaze Lye Common and the other from Station Road, providing access to junction 17 of the M4.</p> <p>There are a number of services and facilities in the local area, including but not limited to: village store, primary school, guest house and pub. Christian Malford benefits from existing bus stops along the route from Chippenham to Little Somerford. Chippenham has a wide range of services and facilities and is approximately 4 miles away.</p> <p>A review of Natural England's Magic Maps Application shows that the site has no statutory designations and no historic statutory designations on the site. There are three listed buildings within approximately 150m of the site with residential development and an existing road between the site and these buildings. The north east corner of the site is situated in Flood Zone 2 with the remainder in Flood Zone 1.</p> <p>A location plan is appended to this representation.</p> <p>Potential Uses and Capacity</p> <p>We propose that the net developable area of the site would be able to accommodate up to 50 dwellings, including affordable housing. This capacity has been calculated as a result of a masterplanning exercise that takes into account the site's characteristics and constraints. It is considered that the site is capable of achieving development of up to 50 dwellings whilst incorporating generous open space provision along with landscaping features.</p> <p>Site Suitability</p> <p>The Wiltshire Core Strategy identifies Christian Malford as a Large Village, defined as a settlement with a limited range of employment, services, and facilities. Development at Large Villages is intended to be limited to that needed to help meet the housing needs of settlements. Halsall Homes have undertaken a significant amount of work towards an outline planning application for the site including a number of technical assessments that are on-going. The technical studies have been used to inform the development of the masterplan for the delivery of up to 50 dwellings.</p>			

	<p>Technical work is on-going for the site, however it is known that the site is predominantly in Flood Zone 1, with the north east corner of the site situated in Flood Zone 2, and studies of surface water flooding on the site have been undertaken. This knowledge has been used to inform the layout used in the masterplanning exercise whereby development is removed from the section of the site in Flood Zone 2, and focused only in areas of the site in Zone 1 where risk of surface water flooding is also at its lowest.</p> <p>The site can be suitably accessed from Station Road and on-going Transport work is being undertaken to inform the best location for primary access. There is the potential for pedestrian access routes to the village through the Village Hall or the nearby public house.</p> <p>There is no known potential for any contamination or any other key constraints on the site.</p> <p>Forthcoming proposals for the site will be carefully considered and informed by technical assessments. The design of the scheme will be informed by an understanding of the local character and mitigate risk of surface water flooding to the built form. The site's potential for biodiversity will be informed by ecological surveys however it is considered that this will be restricted primarily to the hedgerows and trees on the boundaries of the site which should not be affected by any forthcoming proposal.</p> <p>Site Availability</p> <p>The site is currently owned by a single party who have already concluded discussions with Halsall Homes, resulting in the exchange of an Option Agreement between Halsall Homes and the landowner.</p> <p>Therefore, there is a realistic prospect that a planning application will be submitted within the next two years of the Plan period.</p> <p>Site Achievability</p> <p>There is a highly realistic prospect that the site will come forward for residential use as the site has willing landowners, and an actively engaged house builder who have put in place a development team to bring forward a planning application on the site. It is confirmed that the site is 'deliverable' in accordance with paragraph 47 of the NPPF, which means the site is:</p> <ul style="list-style-type: none"> Available now (the site has no current use that would delay development); Offers a suitable and sustainable location for development; and Is achievable with a realistic prospect that housing, including affordable units, will be delivered within five years and that development will be viable. <p>Allocating the site for development would assist in contributing towards the supply of housing. While the Council can currently demonstrate a five year housing land supply this should not be seen as a cap on housing delivery.</p>
<p>Attached files (Please see Objective)</p>	<p>4731952</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To discuss issues of the Plan's soundness and any site specific details relating to the site at land off Station Road, Christian Malford.</p>

Comment ID:	2636	Consultee Mr Simon Jenvey Halsall House	Agent Mr Tom Stanley Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133667	Colliers International Person ID: 1133670	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Strategic Housing Market Assessment (SHMA) (2011) informed the Wiltshire Core Strategy, and has informed the Wiltshire Housing Site Allocations Pre-Submission Draft (WHSAP). Based on the SHMA, the Core Strategy proposed a housing requirement of 42,000 over the period of 2006 to 2026. The SHMA identified a need of 34,000 over the period 2011 to 2026, of which 15,264 should be new affordable dwellings.</p> <p>In the Chippenham Community Area Remainder, the WHSAP identifies a residual requirement for the Plan Period, removing completions and developable commitments from the indicative requirement for 2006 – 2026, of 58 dwellings. The WHSAP allocates two sites in the Chippenham CA Remainers:</p> <p>H2.11 – Land at the Street, Hullavington H2.12 – East of Farrels Field, Yatton Keynell</p> <p>The site allocation process excluded those areas that have a forthcoming Neighbourhood Plan, thus allocating sites where need was unlikely to be met due to a lack of site allocation.</p> <p>The two sites allocated together are intended to provide approximately 80 dwellings, 22 more than the indicative requirement for the CA Remainder. The treatment of OAN requirements being exceeded is agreed as positive and justified given Central Governments views on the matter. The 'over-supply' of housing is reinforced by appeal decisions, such as the Appeal Decision on APP/Y3940/W/17/3166946 for 6 dwellings in Bradford on Avon dated 28 July 2017. In this decision, the Inspector notes that whilst North and West Wiltshire HMA can demonstrate a five year housing land supply which it notes it is exceeding, these targets are not intended to be a cap, and the appeal was allowed given the sustainable location of the development.</p> <p>Exceeding the OAN also assists in the contribution towards affordable housing. The SHMA identified a requirement from 2011 – 2026 of 15,264 affordable homes out of a total requirement of 34,000. This equates to a requirement of approximately 45% of new dwellings in the county to be affordable.</p> <p>Core Policy 43 sets out two zones for the provision of affordable housing – a 30% zone and a 40% zone. Given that sites of fewer than five dwellings are not subject to this policy, this would give an approximate rate of only 35% affordable across the region, 10% lower than the OAN for affordable housing. The Council's adopted OAN for the period 2006 – 2026 is 42,000. For clarity, we will use the total OAN identified above for the period of 2011-2026 of 34,000 throughout to align with the identified affordable housing OAN.</p> <p>Based on the full OAN outlined above of 34,000 dwellings, and the judgement that approximately 35% of all new dwellings will be affordable units, only 11,900 affordable units will be provided.</p> <p>This is a shortfall of 3,364 dwellings from the OAN for affordable housing. As the LPA strategy for delivering the affordable housing contribution is a market led policy approach, if the LPA intends to meet fully the required full amount of affordable housing, 15,264 dwellings, this would require approximately 43,600 new dwellings to be built in the period of 2011-2026. This is an approximate increase of 28%, significantly higher than the 34,000 identified for the period 2011 – 2026. The approach taken by planning inspectors at a series of local plan examinations recently</p>				

has been consistent. Inspectors view the importance of meeting fully the OAN where Affordable Housing is concerned as a priority. Without fail Inspectors are expecting LPAs to address this either before or during the Examination and where during the examination they are directing at least a 10% increase in the housing target. To ensure there is a willingness to exceed the existing housing target and any future 5 year housing land supply deficit, the Site Allocations DPD should begin to address these shortcomings.

The adopted OAN in the Wiltshire Core Strategy covering the period 2006 – 2026 is 42,000. An increase of 28% on this figure would equate to an additional 11,760 forming a total of 53,760 dwellings for the Plan period. The site allocations DPD should seek to address the shortcomings in the Local Plan by allocating sites that can assist in bridging the supply gap and bring Wiltshire into alignment when considering their performance against the evidence directs a full OAN for affordable housing for the period 2006-2026 of 24,192 (45% of all new dwellings).

The WHSA identifies a total housing supply as follows:

Area	Minimum requirement 2006 - 2026	Completions 2006-2017	Developable commitments 2017-2026	Allocations	TOTAL	%Variation
East Wiltshire HMA	5,940	3,497	2,273	350	6,120	3.0%
North and West Wiltshire HMA	24,740	12,603	11,566	1,205	25,374	2.6%
South Wiltshire HMA	10,420	5,067	4,759	910	9,736	-6.6%
Wiltshire Total	41,100	21,167	18,598	2,465	41,230	0.3%

This demonstrates that the indicative requirement has barely been exceeded. Given the above calculations, whilst the WHSA meets the adopted minimum OAN, in order to meet the OAN for affordable housing the Council will need to deliver at minimum an additional 12,530 dwellings of which at least 5,638 should be affordable units.

Whilst exceeding the current residual requirement in the Chippenham CA Remainder, there is a significant way to go before the affordable housing need is met. Applying a 28% increase to the Chippenham CA Remainder gives an indicative requirement for 2006 – 2026 of 742 dwellings. The WHSA identifies that 409 dwellings have been completed between 2006-2017, and developable commitments for 2017-2026 are 113 dwellings. This leaves a residual requirement for the Plan period of a minimum of 220 dwellings in order to meet the affordable housing need.

Paragraph 182 of the NPPF sets out the requirements for a Plan to be considered sound, namely that it is:

Positively prepared – should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

	<p>Consistent with National Policy – should enable the delivery of sustainable development in accordance with the policies in the Framework. For the reasons outlined above, in order to safeguard against an impending 5 year housing land supply gap Wiltshire would need to deliver an additional 12,530 dwellings for the period 2006 – 2026 above what has already been completed, committed, or allocated. In light of this, it is considered that the Plan is not positively prepared as it does not seek to address the full needs of the Authority.</p> <p>The Plan is not the most appropriate strategy when considered against the alternatives. In order to meet the full needs of affordable housing within Wiltshire, the Council should seek to deliver a greater number of allocations in areas that are considered appropriate for development. As such, it is considered that the Plan is not justified.</p> <p>The policies contained in the Plan can be considered effective in so far as they would be sufficient to meet the adopted housing targets for the authority and allow for cooperation across boundaries. However, for the reasons outlined above, the Plan is not considered when considering the ability to meet fully the needs of the authority where affordable housing is concerned. The Plan is therefore not consistent with national policy. Given what is outlined above, it is recommended that the Council should allocate additional large sites that have the potential to deliver higher numbers of affordable housing to meet the Full OAN for affordable housing. In order to meet this, the Council would be required to deliver at least an additional 12,530 dwellings. Allocation of additional sites will assist the Council in exceeding the minimum figures set out by the OAN. By allocating further sites, the Council will have a more realistic chance to meet the needs of the authority where affordable housing is concerned. As outlined above the true affordable needs are approximately 24,192 dwellings. Increasing the certainty of supply of viable housing land will also ensure that the annualised housing target is consistently met and will allow for any potential issues in other allocated sites causing a delay in delivery to be addressed. Increased flexibility will ensure the DPD is capable of being delivered and any potential shortcomings in future years will be catered for.</p> <p>Christian Malford is a sustainable location that can support development. The forthcoming Neighbourhood Plan allocates some sites towards the supply of housing. However, the consultation version of the Neighbourhood Plan allocates only three sites with five or more dwellings. All three are identified as supporting six dwellings, meaning that Christian Malford will be providing a maximum of 6 affordable units out of anticipated housing delivery of 30 dwellings. In comparison, if the site outlined above were allocated and the full 50 dwellings were brought forward, this would contribute at least 20 affordable units.</p> <p>In conclusion, the Council should aim to allocate additional sites in sustainable locations such as Christian Malford in order to ensure both the overall housing target and also the full complement of affordable units are delivered. The above site at Christian Malford would contribute towards the supply of housing in general, but crucially will also contribute towards the supply of much needed affordable housing.</p>
<p>Attached files (Please see Objective)</p>	<p>4731952</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2637	Consultee Mr William Clarke	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133686	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	One would have thought that villages further up the Avon Valley would offer a much better environment for such development. Moreover, many would benefit both economically and socially, from the addition of 20 or more new houses. It would bring an injection of young families into communities that are in danger of stagnation.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2638	Consultee Mr William Clarke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133686		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>That aside, I really must take issue with the (seemingly) uninformed planning officer, who has earmarked land adjacent to Durrington Manor for these houses. This area has never been part of the Village Plan. Clearly, he or she has never seen or visited this particular piece of land or has any idea of its current usage.</p> <p>For your information, the area annotated is currently used for agricultural use and is leased to a self help group of equestrian tenants. I attach a copy of the plan. I would like to point out that the suggestion by the planning officer to take the part annotated A, and add it to Piece Meadow B would render the remainder of the fields and stables useless. The fields at Part C have no access to any roads in the area, and the stable area at Part D would be completely divorced from the pasture land.</p> <p>In conclusion, and as a matter of urgency, I suggest the planning officer(s) responsible for this proposal visit the site as soon as possible and I will be very happy to show them the problems their short sighted proposal is likely to create.</p>				
Attached files (Please see Objective)	4731964				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2639	Consultee Mr William Clarke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133686		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I realise that the owners of the land would be quite happy to sell it for development, but the suggestion has never been approved by the Town and Parish council who have always believed that this unique area, the last rural aspect within the village boundary still undeveloped, should remain as such.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2640	Consultee Mr William Clarke	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133686		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I write in response to the recent declaration by Wiltshire Council 'to allocate land for the building of 60 new homes' in Durrington. My first question is why Durrington? It is close to the A303 corridor and suffering, along with many other villages in this part of south Wiltshire, from 'rat running' and a marked increase in traffic congestion - as a result of continued 'urban development'.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2641	Consultee Amita Management Ltd	Agent Mr Mark Chadwick Hunter Page Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 824512	Person ID: 901379	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The draft WHSAP is being prepared and will be examined during the period when the Wiltshire Core Strategy (WCS) is being reviewed. As set out in the previous section the WCS time period is to 2026 and is required to provide 'at least 42,000 dwellings' over that period. As also mentioned above, Government consultation on local housing requirements, identifies that the Wiltshire figure for 2016-2026 is over 100 dwellings per year higher than the figure in the WCS. Given these factors Amita Management Limited considers that the WHSAP should identify sufficient sites in order to provide the necessary flexibility to address those needs. Failure to do so is considered to be contrary to the soundness test to plan positively.</p> <p>Amita Management Limited notes that in order to meet the Malmesbury Community Area Remainder figure, a site is allocated in Policy H2 for 50 dwellings at Ridgeway Farm, Crudwell (H2.13). The written justification at paragraph 5.111 would apply to the Cotswold Community site, only to a greater degree in that the Cotswold Community site is wholly previously developed, has 27 existing dwellings and can provide a further 48 dwellings and community gains as follows:</p> <ul style="list-style-type: none"> Enhancing existing heritage assets and the historic hub, by giving the buildings a viable new lease of life to secure good stewardship in the future. Opening up public access and delivering the 'missing link' in terms of the local cycle network. Replacing the existing housing stock and supplementing it with a range of houses and cottages of a variety of sizes and mix. Securing high quality design and building practices, respectful of traditional crafts and building vernacular governed by a masterplan. Facilitating the upgrading and modernisation of the existing community facilities at Ashton Keynes through planning obligations; including the village hall, crèche and GP surgery. <p>Given the above, Amita Management Limited believes that the approach of the WHSAP fails to plan positively by not allocating the Cotswold Community site and fails to meet the test of compliance with the Framework requirements to 'significantly boost the supply of housing' and to "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value".</p> <p>[see attached for full representation]</p>				
Attached files (Please see Objective)	4731988 / 4731990 / 4731989				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Complex issues which need to be explained.				

Comment ID:	2642	Consultee Amita Management Ltd	Agent Mr Mark Chadwick Hunter Page Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 824512	Person ID: 901379	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site -The Cotswold Community		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Around 12 hectares of the site is capable of accommodating development. The site presently forms an unoccupied C2 planning unit; which included 27 individual C3 residential planning units on the site.</p> <p>The site currently accommodates circa 120,000 sq. ft. of buildings including: 27 detached, semi-detached and terraced C3 houses, dormitories, hostel accommodation and extensive staff accommodation Weaving (community) hall a large function barn Cricket ground and pavilion, gymnasium and swimming pool Forge, science laboratories, maintenance and craft workshops</p> <p>The buildings identified above are supplemented by extensive hardstanding areas of storage and parking and playing fields. In addition, physical infrastructure to serve the site is already established including mains electricity, water and a private sewerage plant.</p> <p>The supply of new housing stock at the site will meet identified needs but also forms a financial driver, enabling the delivery of wider benefits to the locality, including the much desired extraction of minerals in accordance with the Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan, (Adopted May 2013).</p> <p>Importantly, redevelopment of the site will to help enhance and sustain existing services and facilities in Ashton Keynes and neighbouring settlements. It will also enable new services and facilities to be provided to serve both the new and existing community; enhancing the sustainability of the local area without development putting additional strain on the existing development boundaries.</p> <p>Key benefits of the redevelopment of the Cotswold Community would include: The extraction of mineral resources in a quick, efficient manner and the reinstatement of those areas to landscaping and lakes. A community bus service, controlled by the local community rather than by Wiltshire and Gloucestershire councils. That bus service will serve the neighbouring villages and provide a link to Kemble Station. Contributions towards improved GP facilities in the parish, through expansion of the existing GP facilities at Ashton Keynes. Contributions towards an improved village hub; community shop, meeting spaces and pre- school facilities. A financial contribution would be made towards the existing primary school to enable its much needed updating and expansion of which there is an existing identified issue that needs to be addressed. The provision of some workshop and studio space as well as business units and a possible live work hub with central facilities such as admin support, rooms for meetings and office hardware. The opening up of public access through the site and the improvement of footpaths, bridleways and cycle paths to provide greater integration with the surrounding communities. The provision of the much desired “missing link” of the existing footway/cycle way on the Spine Road East. Addressing the concerns of the public regarding the safety of the North End Crossroads. Developable and Deliverable</p>				

The National Planning Policy Framework states that for sites to be considered 'developable' they should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. To be considered 'deliverable' the Framework requires sites to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years and, in particular, that development of the site is viable. In respect of the Cotswold Community site, those tests are addressed as follows.

Suitable

Landscape

According to the Settlement Strategy Topic Paper (2012) about 70 percent of Wiltshire is designated as Areas of Outstanding Natural Beauty (AONB), Special Landscape Area (SLA) or Green Belt which restrict the location of new housing in the area.

However, the Cotswold Community site is not subject to any special landscape designations and is relatively free from physical constraints. The development is remote from the Cotswold AONB and other landscape designations where there is a presumption against development. The site is also not subject to any special wildlife or nature conservation designations.

Accessibility

The site is located approximately 1.9 miles to the north west of the village of Ashton Keynes; identified as a Large Village. The market town of Cirencester is approximately 6 miles to the north and the market town of Malmesbury is approximately 10 miles south west. Both settlements provide a high order of employment opportunities, services and facilities.

Kemble Train Station is located approximately 4.5 miles north West of the Cotswold Community. Regular services operate from Kemble to Stroud, Gloucester, Cheltenham and Swindon. A detailed assessment has been undertaken to deliver a new regular bus service linking the site to existing villages and Kemble Station.

The site has an existing vehicular access from Spine Road West, located about 700m west of the North End crossroads. A highway assessment has identified that the site can accommodate safe access onto the public highway via the existing vehicular access.

There are three public rights of way that run through the site (reference AKEY 3, 4 and 5) and the area around the site benefits from a large number of public rights of way, including footpaths, bridlepaths and cycle routes which provide both day to day and leisure routes between settlements. Significant opportunities exist to enhance that provision across the site.

Socio-economic

As identified earlier within this statement, the residential redevelopment of this site will provide a key opportunity to make efficient use of previously developed land and to provide benefits to the wider community through the injection of new investment into the local area as well as supporting the existing community facilities

Available and Achievable

The site is privately owned and there are no constraints that would delay commencement of development. The site has been subject to initial technical land appraisals that have identified there are no physical or environmental constraints that would delay or preclude the development of the site. An agreement is in place with a local minerals operator and it is clear the redevelopment of the site will enable extraction of mineral resources within an 18month-2year period

It is clear that the Wiltshire Housing Allocations Site Plan does not provide the sufficient range of sites to enable flexibility of housing provision. This is particularly the case given the review of the Wiltshire Core Strategy and Government consultation on local housing requirements. On this basis the submitted Wiltshire Housing Allocations Site Plan will fail the test of soundness in respect of planning positively.

The redevelopment of sites such as the Cotswold Community is supported by national policy. Paragraph 55 of the Framework is of particular relevance which advises that in order to promote sustainable development in rural areas 'housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.' In addition, the Framework provisions to "boost significantly the supply of housing" and "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that is it not of high environmental value" are not complied with. On this basis the submitted Wiltshire Housing Allocations Site Plan will fail the test of soundness in respect of compliance with national policy.

It is therefore suggested that the Wiltshire Housing Site Allocations Plan should allocate the Cotswold Community site to address these issues.

Attached files (Please see Objective)	4731988 / 4731990 / 4731989
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Complex issues which need to be explained.

Comment ID:	2643	Consultee Helen Patton New Forest National Park Authority	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 382305	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Chapter 7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for consulting the Authority on the above document. On behalf of the Authority I would like to take the opportunity of this consultation to make the following comment.</p> <p>Chapter 7 Implementation and Monitoring</p> <p>Paragraph 6.77 of the adopted Wiltshire Core Strategy (January 2015) states that;</p> <p>'Wiltshire Council will support the production and implementation of a New Forest Mitigation Strategy in partnership with Natural England and other partners as appropriate. This will set out the delivery mechanisms and funding requirements (through either CIL, S106 or other appropriate mechanism) such that impacts of the plan upon the New Forest SPA are fully mitigated. After adoption the New Forest Mitigation Strategy will be a relevant planning consideration. Prior to this, planning applications will be subject to individual HRAs and bespoke mitigation secured as necessary.'</p> <p>The New Forest National Park Authority is aware that a New Forest Mitigation Strategy hasn't been produced to date, two and a half years after the adoption of the Council's Core Strategy. It is also unclear in the absence of an Annual Monitoring Report (the Planning Policy page of the website refers to an Annual Monitoring Report for 2016 which is currently being prepared) whether in the absence of a Mitigation Strategy whether bespoke mitigation has been secured for individual planning applications as set out above.</p> <p>Whilst the Authority recognises that none of the housing site allocations in this current consultation are identified as falling within the visitor catchment of the New Forest SPA and the requirements of the adopted Core Strategy in relation to the New Forest SPA as set out above may not apply, the Authority would like to emphasise that Wiltshire Council isn't currently meeting its requirements in relation to other housing allocations identified within the adopted Core Strategy. As such, the impacts on the New Forest SPA are not currently being mitigated – an issue that was identified in the HRA of the Council's adopted Core Strategy some years ago.</p> <p>As you may be aware mitigation strategies have been in place for planning permissions granted by the National Park Authority and New Forest District Council since 2012 and 2015 respectively and I would suggest that these could provide a useful starting point to any discussions on the production of a mitigation strategy in line with Wiltshire Council's obligations under the habitats regulations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2644	Consultee Ms Elizabeth Burt Taylor Wimpey	Agent Mr Darren Parker Operational Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1113871	RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Plan Objectives		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Plan Objectives and Housing Need</p> <p>The purpose of the Wiltshire Housing Site Allocations Plan (“the Plan”) is to allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five-year land supply in each of Wiltshire’s three HMAs over the period to 2026.</p> <p>The WCS refers to the role of the Plan, in combination with the Chippenham Site Allocations Plan, to help ensure a sufficient choice and supply of suitable sites throughout the plan period in accordance with national policy and to complement neighbourhood planning.</p> <p>CorePolicy2 sets out the Delivery Strategy for the plan, which seeks to deliver a minimum of 42,000 new homes across Wiltshire between 2006 and 2026, including the provision of at least 24,740 new dwellings within the North and West Wiltshire Housing Market Area (NWWHMA). Completions to date (2006-2017) is 12,603. Leaving a minimum requirement for 12,137 homes to be completed in the next nine years to 2026. The draft Plan (para 4.2) states a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF. There has been persistent under delivery in the NWWHMA. Over the last 10 years the at least requirement has only been exceeded on three occasions (Wiltshire Housing Land Supply Statement (Update) Base date: April 2016). The housing land supply issue in the NWWHMA can be summarised as follows:</p> <p>Minimum annual requirement 2006- 2026 = 1237 homes per annum Requirement 2006-2017 = 13,607 Completions to date (2006-2017) = 12,603 (1145 homes per annum) Minimum requirement 2017-2026 = 12,137 (1214 homes per annum) Commitments 2017-2026 = 11,566 Proposed allocations = 1195 Commitments and proposed allocations = 12,761 Windfall = 2086 Minimum requirement plus 20% buffer = 14,564 Five-year land supply requirement = 8091 homes</p> <p>The 20% buffer is applied to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land (NPPF para 47).</p> <p>The Chippenham Site Allocations Inspectors Report notes the Courts have established that the NPPF does not require a site allocations plan to also question whether further housing provision will need to be made: that is the role of the WCS through review. In December 2014 the Wiltshire Core Strategy Inspector noted the Council has clarified that it will be undertaking a planned early review of the CS. Nearly three years later this review hasn’t taken place and therefore a risk adverse approach to the Plan should be applied in order to achieve the at least 42,000 homes.</p> <p>The opportunity now and what is being proposed is not to question further provision but to ensure the housing provision in the WCS is achieved. The overall purpose of the buffer is not to deliver homes over and above the minimum requirement (24,740). The buffer reduces the risk of not achieving the minimum requirement rather than heightening the prospect of exceeding the minimum requirement. The 20% buffer is necessary to meet the housing need in a sustainable planned fashion.</p>				

	<p>By allocating sites to match the minimum requirement plus 20% the certainty to achieve the minimum is heightened and any Windfall delivers the over and above the minimum portion. Reducing the risk of failing to meet the minimum requirement will boost significantly the supply of housing (NPPF para 47). The Plan would not be positively prepared and effective if it only relied upon Sites which have not been specifically identified as available in the Local Plan process to deliver more than 42,000 homes. Windfall sites normally comprise previously-developed sites that have unexpectedly become available (NPPF glossary). The expected supply, the allocations, should be set to achieve the minimum requirement.</p> <p>A positively prepared Plan and one that stands the best prospect of being effective would include allocations for NWWHMA for up to 14,564 homes.</p> <p>Excluding an allowance for windfalls, anticipated land supply in the North and West Wiltshire Housing Market Area compared to strategic requirements, according to the Topic Paper 4 Developing Plan Proposals (Table 5.4) delivers a 'surplus' of 5% (624 homes) of the remaining requirement. This assumes all the commitments and proposed allocations are delivered. To be prudent and pragmatic a 20% buffer should be applied to reduce the risk of a shortfall as a consequence of not all of the commitments and allocations delivering. This is considered to be a suitable non-implementation/delivery rate. This is particularly pertinent as the Plan is intended to achieve more than 42,000 homes overall and more than 24,740 homes in the NWWHMA. The 624 homes is therefore not a surplus, it is, if all the sites deliver, 102.5% of the 'at least' requirement. Therefore, non-delivery of any of the proposed allocations and commitments could result in the housing figure not being achieved. The NPPF (para 47) advocates the application of a 20% buffer to have a realistic prospect of achieving the planned supply. The planned supply is more than 42,000 homes. A 2.5% buffer in the NWWHMA is therefore insufficient and therefore the Plan is not effective or compliant with National Policy.</p> <p>In its current form the Plan isn't sound.</p> <p>Changes required</p> <ol style="list-style-type: none"> a. Allocate additional sites, including the available land west of Ashton Road, Trowbridge which is being promoted by Taylor Wimpey, to match the minimum required housing plus 20% in order to ensure the minimum homes required is achieved b. Add allocations in total for an additional 1803 homes in the NWWHMA including the land west of Ashton Road, Trowbridge. c. Utilise windfall sites to achieve delivery beyond the minimum required.
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	2645	Consultee Ms Elizabeth Burt Taylor Wimpey	Agent Mr Darren Parker Operational Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1113871	RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Plan Objectives		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Core Strategy Review</p> <p>The latest Local Development Scheme (LDS) shifts from a Core Strategy review to the completion of a new Local Plan. Aligned but separate Local Plans for Wiltshire and Swindon are to be undertaken, informed by a joint evidence base and a non-statutory 'joint framework' covering matters similar to a joint strategic plan which both authorities are 'signed' up to.</p> <p>The Wiltshire Local Plan is anticipated to be adopted by early 2021 depending upon a variety of factors including a jointly agreed Spatial Framework with Swindon by mid-2019. If this timetable is achieved the early review of the WCS will have been completed seven years after the WCS Inspectors report was completed.</p> <p>Again, to minimise the risk of failure to achieve the requirements of the WCS the changes sought above should be applied to the WHSAP to cover the period to 2021 and beyond if there is delay. If the WHSAP is adopted as anticipated by winter 2018 this will be twelve years into the twenty-year development plan period.</p> <p>There is a risk of further delay and consequently contingency should be applied to the land allocated to meet the Core Strategy requirement of at least 42,000 new homes.</p> <p>Change required</p> <p>a. Allocate additional sites, including the available land west of Ashton Road, Trowbridge which is being promoted by Taylor Wimpey, to match the minimum required housing plus 20% in order to ensure the minimum homes required is achieved</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Given the complexity and significance of the issues raised it is considered necessary to be present at the oral part of the examination.				

Comment ID:	2646	Consultee Ms Elizabeth Burt Taylor Wimpey	Agent Mr Darren Parker Operational Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1113871	RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Selection		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Selection</p> <p>The Plan (Topic Paper 3 para 3.26) states “In the North & West HMA and South HMA there is a significant reliance on large strategic housing sites to meet strategic requirements. These are now beginning to play a much more substantial role in housing growth. The housing land supply position is considerably lower than in the East HMA, and in the South HMA there are a number of occurrences where the 5.25 years’ worth of supply is marginal. This would indicate a greater degree of intervention to meet the objectives of the Plan.”</p> <p>The Plan (Topic Paper 4 Developing Plan Proposals) also states: Site delay- large sites for housing, Experience shows that the complexity of delivering large sites can result in forecast start dates slipping. (para 2.11)</p> <p>The WCS allocation at Ashton Park, South East Trowbridge is the largest single site within the HMA. More than one in ten of all new dwellings in the HMA are expected to be built on this one site over the remaining years of the plan period. It is self-evidently important to ensuring a surety of supply, and a site where planning permission has yet to be granted and a master plan agreed. (para 5.13)</p> <p>Notwithstanding this scepticism, Table 5.1 in Topic Paper 4 Developing Plan Proposals anticipates quite a substantial turnaround in future completions compared to past completions.</p> <p>The WCS allocates a number of large mixed use sites for development over the plan period. Evidence to date shows that several strategic sites proposed in the WCS are failing to be developed to the timescales originally envisaged, despite Council and developer aspirations to do so, because of the complexities involved. (Topic Paper 4, para 2.18)</p> <p>One of the tests of resilience (Topic Paper 4, para 2.11 c) is Persistent under delivery – NPPF requires a larger land supply where there has been persistent under-delivery (a 20% buffer rather than 5%). The Paper states It would be prudent to aim to have a 20% buffer. The application of the 20% buffer is the means to achieve the minimum requirement and Windfall is the means to deliver the homes over and above the at least 42,000.</p> <p>Change required</p> <p>a. Allocate additional sites, including the available land west of Ashton Road, Trowbridge which is being promoted by Taylor Wimpey, to match the minimum required housing plus 20% in order to ensure the minimum homes required is achieved</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Given the complexity and significance of the issues raised it is considered necessary to be present at the oral part of the examination.				

Comment ID:	2647	Consultee Ms Elizabeth Burt Taylor Wimpey	Agent Mr Darren Parker Operational Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1113871	RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge CATP		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Trowbridge Community Area Topic</p> <p>The Topic Paper states At Trowbridge, approximately 5,860 will be delivered which includes an area for strategic growth to the south east of the town (Ashton Park). An additional 950 dwellings will then be developed at the town only once improved secondary provision is in place towards the end of the Plan period and there has been a further assessment of effects on protected bat species and their habitats. (para 2.2)</p> <p>The provision of housing at Trowbridge is therefore subject to the delivery of a large urban extension and other qualifying criteria being met to enable other sites to come forward.</p> <p>The residual requirement at Trowbridge to meet the minimum housing required by the WCS is 2020 homes. It is noted in the Topic Paper (para 2.4) that woodland sites to the south east of Trowbridge support a breeding population of Bechstein bats, associated with the Bath and Bradford on Avon Bats SAC. All development will be required not to adversely affect this designation and to ensure that connectivity with the SAC is maintained, having particular regard to the Wiltshire Bats SAC Guidance.</p> <p>The Topic Paper goes on to conclude (para 5.22) Six available, achievable and deliverable sites are identified for allocation at the Principal Settlement of Trowbridge. Whilst not capable of delivering all the indicative housing requirement, these sites are considered to be the best and most appropriate options to allocate at the town. Development of the sites for housing would contribute positively towards meeting some of the indicative shortfall as well as delivering aims of the area strategy for the town through a plan-led approach to maintaining levels of housing supply.</p> <p>These six sites account for 800 of the 2020 home residual requirement. This is set against a backdrop of the delivery risks outlined above, namely the delays often associated with large urban extensions, school provision and bat mitigation. The scale of allocations especially given the risks outlined is inadequate for a Principal Settlement such as Trowbridge. Therefore, the Plan is not currently effective or justified. More sites should be allocated to meet the needs of Trowbridge and the wider HMA. The site at West of Ashton Road is suitable and available to meet some of the needs of Trowbridge and should be allocated for housing.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Given the complexity and significance of the issues raised it is considered necessary to be present at the oral part of the examination.				

Comment ID:	2648	Consultee Ms Elizabeth Burt Taylor Wimpey Person ID: 1113871	Agent Mr Darren Parker Operational Director RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		No
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - Land West of Ashton Road (Site 292 Land North of Green Lane)			Positively prepared Justified Effective Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Land West of Ashton Road (Site 292 Land North of Green Lane) To improve resilience and make the Plan sound further land should be allocated. As per the Trowbridge Community Area Topic Paper site 292 Land north of Green Lane, in the control of Taylor Wimpey, was removed from the SHLAA after Stage 3 because it was identified that it could have a major adverse effect in relation to the Bath and Bradford on Avon Bats SAC. This is not a site-specific issue it is one that applies across Trowbridge. It is however an issue that can be addressed on a site by sites basis. Appropriate mitigation is possible at the West of Ashton Road site. The readily available site is the subject of an outline planning application for up to 250 homes submitted in April 2016 and yet to be determined. In June 2017, a revised masterplan was submitted to take into account additional measures required to provide further mitigation for Bat habitat. The revised masterplan and technical notes are attached to this submission. Subsequent to which the Habitats Regulations Assessment (HRA) of the draft Wiltshire Housing Site Allocations Plan was published. The Plan (para 5.44) recommends developing a strategy for managing recreational pressure across the town. Detailed design and layout of schemes would need to consider additional planting and open space to protect and enhance these Biodiversity Action Plan priority habitats and thereby augment opportunities for bat foraging routes and roosting sites. This could include establishing dark corridors through sites to protect foraging routes and roosting areas for bats. Specific measures that will be required are explained for each site and funding contributions may be sought toward measures to be contained in the Trowbridge Recreation Management Mitigation Strategy. The Council has therefore recognised that mitigation can be implemented to address the issue of the Bats SAC. A planning application would provide the mechanism by which to consider the issue and employ appropriate mitigation. A review of the HRA has been undertaken and anticipated major adverse effects noted at the SHLAA review can be managed and mitigated. This is set out in the Technical Note attached to this submission. In summary, the findings are the Ashton Road site falls within the SAC zone of influence set out within the Housing Site Allocations HRA, as do draft allocations. However, the zone of influence is not based on location-specific evidence. The HRA acknowledges that individual sites within the zone of influence might not produce a significant effect on the SAC. The Ashton Road mitigation package has been prepared as a standalone scheme which could be effectively delivered prior to (or indeed in the absence of) Ashton Park mitigation being brought forward. The specific standalone measures that can be delivered at the site are: Design; A 100m buffer / standoff from Green Lane Wood; Avoidance of development within easy walking distance of Green Woods; The western boundary secured using a combination of SuDS, fencing and thorny planting; The boundary along Green Lane secured as above or by backing dwellings onto the hedgerow; New habitat creation to enhance bat habitat. Retention of all hedgerows within the public domain; Inclusion of dark corridors through the development;			

	<p>Minimisation of hedgerow breaks and use of vegetated hop-over features to ensure continued functionality of hedgerows as commuting features; Other possible measures; Habitat enhancement of Paxcroft Brook Park and; Wardening and Country Park management.</p> <p>The outline application was made on behalf of Taylor Wimpey. The application forms a logical and sustainable location to fulfil some of the at least 12,137 homes required, as determined by the Council, in the remaining Plan period. As an application has been made by a housebuilder and a great deal of technical work has been completed the site is capable of delivering homes in the short term. The site is large enough to make a reasonable contribution to the housing land supply but not so large that it will be hindered by the complexities experienced elsewhere.</p> <p>The sustainability appraisal scoring of the land west of Ashton Road, identified as site 292 by the Council, is not significantly different to the other sites proposed for allocation (albeit the bat issue has been addressed at Ashton Road as above) including site 297 Elizabeth Way which received a scoring very similar to land west of Ashton Road.</p> <p>The land at Ashton Road is a sustainable location for growth and available now. It forms a logical location adjoining the settlement edge of Trowbridge and will deliver a range of homes to assist in meeting the housing needs of Trowbridge and Wiltshire as a whole. [see attached for full representation]</p> <p>Change required</p> <p>a. Add the site (292) West of Ashton Road to Table 5.7, Preferred sites identified for allocation for Trowbridge in the WHSAP Community Area Topic Paper - Trowbridge</p> <p>b. Allocate land West of Ashton Road (292) for housing and add the site (to Table 5.3 at Policy H2, in the Wiltshire Housing Sites Allocations Plan</p>
Attached files (Please see Objective)	4732026
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Given the complexity and significance of the issues raised it is considered necessary to be present at the oral part of the examination.

Comment ID:	2649	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Soundness of the Plan			Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Persimmon Homes supports the preparation of the Wiltshire Site Allocations DPD as an opportunity to revise the out-of-date settlement boundaries and allocate new sites for housing to support the delivery of housing over the remainder of the Core Strategy plan period. However the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared, Justified, Effective Consistent with national policy.</p> <p>The reasons why the draft Plan is not considered to be sound are detailed in these representations. The principal matters of soundness relate to:</p> <p>The failure to identify sufficient land to meet the Council's overall objectively assessed need for housing</p> <p>The Council's site selection methodology including the approach taken to the 'Stage 1' assessment and identification of 'areas of search' that excludes settlements that have capacity to support sustainable development, which is inconsistent with the spatial strategy set out in the Wiltshire Core Strategy</p> <p>The exclusion of sites currently allocated for non-residential uses in 'Stage 2' of the assessment which is not justified or consistent with national policy</p> <p>Inconsistency in the application of the sustainability appraisal carried out in 'Stage 3' of the assessment</p> <p>Inconsistency in the application of the proposed settlement boundary review methodology.</p> <p>Furthermore, on 14 September 2017, the Government published its proposed standardised approach to calculating the local housing need. The draft methodology will have implications for local authorities at an individual level and in Wiltshire the application of the proposed formula for assessing housing results in an increase in need compared to the current local assessment set out in the Wiltshire Core Strategy. Applying the Government's proposed formula, there is a requirement for 2,227 new dwellings per annum in Wiltshire over the period 2016-2026. Compare this to the Wiltshire Core Strategy which is based on 2,100 dwellings per annum, there is potential for considerable under-supply of housing in Wiltshire over the remainder of the plan period. The draft Wiltshire Site Allocations Plan is therefore planning for some 127 dwellings per annum short of the Government's emerging target (which equates to an undersupply of 2,540 dwellings over the whole plan period). The emerging Wiltshire Housing Site Allocations Plan offers the most suitable way forward for identifying further sites to meet this additional need. This would be a sound approach that would allow for a Plan that could be justified and consistent with emerging national planning guidance. The Plan is considered to be unsound and we wish to provide oral evidence.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2650	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Duty to Cooperate		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan is prepared under a legal 'duty to cooperate' requirement through the Localism Act 2011 which requires local authorities to work with neighbouring authorities and other prescribed bodies when preparing a DPD.</p> <p>Wiltshire Council identifies the need to maintain a five year land supply as one of the principal objectives of this Plan. It is therefore disappointing that the draft Plan makes no attempt to support the under-supply at the adjacent local authority of Swindon. Swindon Borough Council's land supply position stands at less than 2.5 years however it is clear that Wiltshire Council has not considered the needs of Swindon in this draft Plan. This Plan provided an opportunity to take forward a review of land to the West of Swindon within the Wiltshire Council administrative boundary and help meet the needs of Swindon.</p> <p>The two Local Authorities of Swindon and Wiltshire are preparing a joint Strategic Housing Market Assessment which will provide the opportunity to develop a joint Local Plan review. However Swindon and Wiltshire have recently adopted revised Local Development Schemes which do not include a commitment to this. Instead, a non-statutory Swindon and Wiltshire Joint Spatial Framework is to be developed for the period up to 2036.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2651	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Neighbourhood Planning		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The relationship between the draft Wiltshire Housing Site Allocations and emerging neighbourhood plans is not clear. Paragraph 2.22 states that the Site Allocations Plan does not take decisions in areas where Neighbourhood Plans have been made or are 'well advanced', however does not define this term. There is no guarantee that a draft Neighbourhood Plan will be progressed by the relevant Qualifying Body or be considered to meet the 'basic conditions' by an independent examiner. It is therefore possible that settlements with capacity for housing development have not been comprehensively assessed as part of the DPD plan-making process. With respect to areas where Neighbourhood Plans are 'well advanced' or have been made, Wiltshire Council would be encouraged to take a more positive approach to the preparation of the Housing Site Allocations DPD. The identification of 'reserve sites' would be supported as this would allow for new housing to come forward in the event that a Neighbourhood Plan allocation proved to be unavailable or undeliverable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2652	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Plan Objectives		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The purpose of the Plan stated in paragraph 1.1 of the draft DPD, principally to update the settlement boundaries and identify sites to demonstrate a five year supply of land for housing, is reflected in the plan objectives 1 and 2 set out in section 3 of the draft DPD. However the stated objective 3 which is “to allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy” has been neglected in the plan-making process. The Council’s approach disregards opportunities to meet the housing shortfall in alternative ‘high-level’ settlements based only on perceived ‘over-delivery’ against the indicative housing need figures set out in the Wiltshire Core Strategy. For example, potential development sites in the Market Town of Westbury have not been subject to any assessment as part of this plan-making process, despite the location in a sustainable settlement.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2653	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		STAGE 1 - AREAS OF SEARCH		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The approach taken to identifying 'areas of search' to meet the remaining housing requirement is unsound. The decisions taken at stage 1 in selecting areas of search is inflexible and does not allow for a comprehensive consideration of potentially more sustainable sites for development in areas where the 'indicative' housing requirement has been met. Persimmon Homes supports paragraph 4.35 of the draft DPD which states that "It would not, however, be reasonable to expect the distribution and scale of land supply to adhere rigidly to the levels set out in the WCS. It would be unrealistic to expect as much. The WCS explains that levels are indicative and that there needs to be some flexibility."</p> <p>This is consistent with Wiltshire Council's adopted local plan, which is clear on this matter. Paragraph 4.20 of the Wiltshire Core Strategy states "The indicative figures also allow a flexible approach which will allow the council including through the preparation of the Site Allocations DPD and local communities preparing neighbourhood plans to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan."</p> <p>The site selection process is therefore flawed as the process only seeks to allocate housing sites at settlements where land supply needs to be supplemented in order to meet the indicative requirements. Instead the selection process should consider the most suitable sites for development which fit with the spatial strategy to direct development to the most sustainable settlements.</p> <p>The Core Strategy Inspector within his report states that the HMAs should provide the basis of supply rather than the smaller community areas which could limit the flexibility and effectiveness of the plan. This is clearly outlined at paragraph 43 of his report: The CS is clear that the distribution of housing land in terms of ensuring adequate supply will be disaggregated in accordance with three housing market areas. I am satisfied, based on the broad assessments of housing need, that such an approach is an appropriate scale for consideration rather than the smaller community areas which would limit the flexibility and effectiveness of the plan. I am also satisfied that the identification of indicative levels of housing for Community Areas is not unduly rigid or prescriptive; such an approach will enable suitable flexibility to be applied by the Council in managing the effective delivery of necessary housing within the HMAs.</p> <p>The site selection process is overly rigid by only considering sites at locations where the 'indicative' requirement has not been met. In doing so the council has discounted sites from the outset which are more suitable and sustainable at alternative settlements. The site selection methodology is therefore not sound in this respect.</p> <p>The exclusionary criterion within the site selection process is unsound. The process excludes sites which are fully or partially within a Principal Employment Area, or other existing development plan allocation. The site selection topic paper places great emphasis on the council's requirement to undertake a SHLAA. However, the NPPF is also clear that the council should undertake a review of economic land in combination or at the same time (para. 161). The absence of this information and the councils approach to excluding all employment sites from the selection</p>				

	<p>process is unsound. The plan is not justified when compared against reasonable alternatives or based on proportionate evidence. Furthermore the plan is not consistent with national policy.</p> <p>The NPPF also states that employment sites should not be protected where there is no reasonable prospect of a site being used for that purpose (para. 22). The NPPS also reiterates that land allocations should be reviewed regularly. The council's last employment land review was undertaken over 6 years ago and can therefore not be relied upon.</p> <p>In accordance with paragraph 22, the Council should include long term employment allocations in their review of potentially sustainable sites for new housing. This is particularly relevant to areas of search where the indicative remaining requirement is high, such as the Principal Settlement of Trowbridge. Paragraph 22 specifically references the need to support sustainable local communities and so the degree of local support should also be considered. Land to the west of Biss Farm (SHLAA site 3247) offers the potential to contribute to the housing shortfall at Trowbridge. The development of the site for residential use is supported by Trowbridge Town Council.</p> <p>In order for the plan to be positively prepared, justified and effective the council should assess and consider the release of employment land for residential development where there is no reasonable prospect of it being used for that purpose.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The Plan is considered to be unsound and we wish to provide oral evidence.</p>

Comment ID:	2654	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Table 4.8		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Table 4.8 of the draft Plan is misleading and should be amended to reflect the latest position and provide an additional buffer of 5% as required by paragraph 47 of the NPPF. This table states that the five year land supply estimate for the North and West Wiltshire HMA as of 2017/18 is 7.15 years. It is unclear why this differs from the Planning Inspectorate's appeal decision of 22 June 2017 at Forest Farm Chippenham (Ref: APP/Y3940/W/16/3150514) which considered that the Council could demonstrate a land supply of 5.40 years. Furthermore, is it to be considered that any reduction against the estimates set out in Table 4.8 represents an undersupply of housing land?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2655	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Master Planning		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As a general comment, it is critical that the approximate number of dwellings identified for each proposed site allocation is treated as indicative. For the majority of proposed site allocations, it is not possible at this stage in the planning process to prescribe an absolute figure for the capacity of each site. A design-led approach to the master planning of each site should be adopted, as informed by a detailed understanding of the site constraints and opportunities. The following sections of the report discuss the site selection process in areas of search in detail.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2656	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Persimmon Homes supports the identification of land for new housing at Market Lavington. The Wiltshire Core Strategy identifies that 490 dwellings should be delivered in the Devizes Community Area 'remainder' between 2006 and 2026. According to Wiltshire Council's Housing Land Supply Statement (March 2017) there is an indicative remaining requirement of some 154 dwellings still to be identified. As a Local Service Centre with a good level of services and facilities, it is appropriate to deliver a high proportion of this identified local need at Market Lavington, particularly given the lack of housing development at the settlement over recent years. Persimmon Homes supports the allocation of sites 2055 and 530 for residential development. The land offers a suitable location for residential development and is available and deliverable in the short term. Persimmon Homes has undertaken work at the site and can confirm that all technical issues can be resolved.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2657	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The site benefits from an existing vehicular access off Fiddington Hill which links to Fiddington Clay. Persimmon Homes controls the land to facilitate the widening of the Fiddington Hill junction to construct a safe and suitable 5.5m access road and 2m wide footway on the north east side of Fiddington Hill.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The Plan is considered to be unsound and we wish to provide oral evidence.			

Comment ID:	2658	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	A Visual Appraisal has been prepared to provide an analysis of views into SHLAA site 2055 and is attached to this representation. The report demonstrates that the whole of the site has the potential to be developed for residential use without significant adverse visual impacts, and that any potential impact on landscape and visual receptors will be localised. Furthermore, through appropriate mitigation, comprehensive redevelopment of the site has the potential to enhance the residential edge of Market Lavington. Wiltshire Council's assessment of the site appears to support these conclusions as table F.3 of the Devizes Community Area Topic Paper identifies that the site is likely to have a minor adverse effect (-) against Sustainability Appraisal (SA) objective 7 (landscape) as per the other sites considered as part of the Market Lavington area of search. There is no reasonable justification for the exclusion of half of SHLAA site 2055 on the basis of landscape impact and it is therefore recommended that the draft Plan be amended to allocate the whole of SHLAA site 2055. The proposed approximate number of dwellings should also be increased to reflect this amendment to the site area.				
Attached files (Please see Objective)	4733981				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2659	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Wiltshire Council's assessment of SHLAA site 2055 against SA objective 2 is queried. Table F.3 considers that development of the site is likely to have a minor adverse effect (-) against the objective to 'ensure efficient and effective use of land and the use of suitably located previously developed land and buildings'. As site 2055 is currently a plant nursery it is considered that the redevelopment of the land will have a minor positive effect (+) against this objective.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2660	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		It is unclear which parts of the draft Plan comprise policy H1.2 and which parts comprise supporting text. If the Council were to amend the Plan to include the whole of SHLAA sites 2055 and 530, paragraph 5.25 should be amended to reflect the revised site area and housing capacity.			
Attached files (Please see Objective)		4733992			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The Plan is considered to be unsound and we wish to provide oral evidence.			

Comment ID:	2661	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Paragraph 5.27 should be amended to take account of the quality of existing vegetation on site as follows "Mature trees and hedgerows of high quality and value within the site should be retained and protected as priority habitat". There are leylandii trees on site that are of low quality.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The Plan is considered to be unsound and we wish to provide oral evidence.			

Comment ID:	2662	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Paragraph 5.32 refers to the site being adjacent to an existing bridleway which is incorrect as the proposed housing allocation is currently drawn. If the whole of SHLAA site 2055 were to be allocated there would be an opportunity to enhance bridleway MLAV24/EAST22 which runs along the western boundary of that part of the site.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The Plan is considered to be unsound and we wish to provide oral evidence.			

Comment ID:	2663	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.4 East of Lavington School		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		An area of approximately 0.6 hectares to the east of Lavington School is identified for the development of approximately 15 dwellings. It is unknown as to whether there is a reasonable prospect of this site being delivered and how a safe and suitable access through the school would be achieved.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The Plan is considered to be unsound and we wish to provide oral evidence			

Comment ID:	2664	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.4 East of Lavington School		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Council's Sustainability Appraisal of the site is also queried. The site is immediately adjacent to Manor House Woods County Wildlife Site (CWS) and as such it is considered that the assessment of the site against SA objective 1 to 'protect and enhance all biodiversity and geological features and avoid irreversible losses' be reviewed. In any case, the likely need to provide a buffer to the CWS to the north and provide adequate residential amenity to the existing dwellings to the south would have a detrimental impact on the capacity of the site to make a contribution to meeting local housing needs including the delivery of affordable homes.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The Plan is considered to be unsound and we wish to provide oral evidence.			

Comment ID:	2665	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.4 East of Lavington School		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		The inclusion of the remainder of SHLAA site 2055 (Fiddington Hill Nursery) represents a more sustainable option to the delivery of additional housing at Market Lavington than site 3443 (East of Lavington School).			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The Plan is considered to be unsound and we wish to provide oral evidence.			

Comment ID:	2666	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - SHLAA SITE 1300 - ASTLEY CLOSE, PEWSEY		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Pewsey Community Area Topic Paper considers that the indicative residual requirement for the Pewsey Community Area over the Plan Period has been met and concludes that therefore the Wiltshire Site Allocations Plan does not need to allocate additional land in this area. This is not a sound basis for failing to consider any of the potentially developable sites at Pewsey for allocation. The Wiltshire Core Strategy is clear that the housing requirement figures that are afforded to individual settlements and Community Areas are indicative, and that a flexible approach to delivery of housing should be adopted.</p> <p>It is noted that a relatively high proportion of the housing already provided for at Pewsey is within developable commitments that have not yet been built. The deliverability of some of the committed sites in this Community Area is disputed. The Highview site at Marlborough Road is identified in the Pewsey Neighbourhood Plan for approximately 49 dwellings, however it is understood that the site is not currently available for development. This site is within the settlement boundary of the Neighbourhood Plan and before this was included in the Limits of Development set out in the Kennet Local Plan 2011 (adopted 2004) - so the principle of development at the site has been set for some time. It is noted that the Council's land supply statement identifies that the site is unlikely to be delivered in the next five years. There is no reasonable prospect of this site delivering housing in the Plan period and therefore alternative sites should be considered.</p> <p>The housing land supply position in the East Wiltshire HMA is strong due to a relatively high number of completions early in the plan period and a number of developable commitments still to be built. However it is noted that for each of the last five years the annual number of completions has been below the annualised housing requirement for the East Wiltshire HMA (297 dwellings/annum) and so the area is unlikely to fare well against the Government's proposed Housing Delivery Test.</p> <p>If the Council were to reconsider the potential for allocating land at Pewsey for housing, Persimmon Homes would support the identification of land at Astley Close (SHLAA Site 1300).</p> <p>The site has not been subject to detailed SA through the preparation of the Housing Site Allocations Plan; however the table below sets out a proposed assessment against the Council's sustainability objectives.</p> <p>As the highest order settlement in the Pewsey Community Area, the Local Service Centre of Pewsey represents the most sustainable location for housing development. The site is positioned in a sustainable location close to the existing services and amenities within the settlement.</p> <p>The settlement of Pewsey is washed over by the North Wessex Downs Area of Outstanding Natural Beauty (AONB) which the NPPF attaches great weight to conservation of. However the effect against sustainability objective 7 (landscape) is not likely to be major adverse. The North Wessex Downs AONB office carried out a landscape sensitivity assessment of SHLAA sites in the AONB in 2012 and thus provides a starting point for the consideration of potentially developable sites in this landscape. The AONB report concluded that site 1300 had some potential for development. The site is well contained by mature trees and hedgerows which would be retained as part of comprehensive development of the site.</p>				

There are no other environmental designations at the site. The site is not within an area of high risk for flooding. Access to the site will be taken from Astley Close, which is acceptable according to the Local Highways Authority.

Table 4.2.1.1 Proposed Sustainability Appraisal of SHLAA Site 1300

SHLAA Ref	Capacity	SA Objective											
		1	2	3	4	5	6	7	8	9	10	11	12
1300	45	-	-	-	-	-	-	--	+++	-	-	++	+

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The Plan is considered to be unsound and we wish to provide oral evidence.

Comment ID:	2667	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Persimmon Homes supports the identification of SHLAA site 263 for residential development as part of the proposed allocation at Elizabeth Way. In accordance with paragraph 47 of the NPPF the site is available now, offers a sustainable location for development and is achievable with a realistic prospect that housing can be delivered on the site within five years.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2668	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - SHLAA SITE 3247 – LAND WEST OF BISS FARM (WEST ASHTON ROAD)		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council's assessment of SHLAA site 3247 is unsound as it is not justified or consistent with national planning policy. The Council's consideration of the site is limited to stating that it is "Part of the Core Strategy strategic allocation south west of Trowbridge" and on this basis removes the site from further consideration. This statement is inaccurate as the site is not part of the Mixed Use Allocation identified at Ashton Park, South East Trowbridge and therefore the assessment with regard to this site is not robust.</p> <p>The site is identified for employment use in the current local plan (Wiltshire Core Strategy, adopted 2015) under Core Policy 35 however the draft Plan is not sound on the basis that the evidence does not justify the exclusion of the further consideration of this site for residential development. Paragraph 22 of the NPPF states that "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities." In accordance with paragraph 22, the Council should include long term employment allocations in their review of potentially sustainable sites for new housing. This is particularly relevant to areas of search where the indicative remaining requirement is high, such as the Principal Settlement of Trowbridge.</p> <p>The site has been identified for employment use for some considerable time, having been allocated in the previous local development plan (the West Wiltshire District Plan, adopted 2004) prior to the allocation in the Wiltshire Core Strategy. The site has been marketed for employment use with a valid planning permission and two access points on the new Leap Gate road have been created. However no suitable employment use has been forthcoming. It should also be noted that the context of the site has changed. The site is currently located on the south east urban edge of the Principal Settlement of Trowbridge, however once the strategic allocation at Ashton Park has been developed the site will no longer offer an edge of town employment opportunity.</p> <p>The site offers an available and deliverable option to contribute to the housing supply shortfall at the Principal Settlement of Trowbridge in a sustainable location.</p> <p>Persimmon Homes is to submit a planning application for a mixed use development at land to the west of Biss Farm in October 2017. The proposed development will comprise circa 270 dwellings (including 30% affordable homes), a play area, a pub/restaurant (Use Class A3/A4), a residential care home (Use Class C2), and land for a Primary School (Use Class D1). It is considered that this proposed site masterplan reflects a more appropriate and deliverable way of developing this allocation. Potential end-users for the non-residential uses have been identified.</p> <p>The site has not been subject to detailed SA; however the table below sets out a proposed assessment against the Council's sustainability objectives.</p> <p>As per the other land considered for development at Trowbridge, the site is located within the consultation zone of Bath and Bradford on Avon Bats Special Area of Conservation (SAC). Although the SAC is relatively well removed from the site (7.9km), woodlands in closer proximity to the site (namely Biss Wood and Green Lane Wood) have been identified as supporting important breeding populations of Bechstein's Bat, a qualifying feature of the SAC, which are functionally linked to the SAC. As such, proposed development of the site will need to be subject to a</p>				

Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2010, to assess the potential for likely significant effects on European designations (i.e. the SAC). An Ecological Appraisal and additional report to inform the HRA have been prepared to support the planning application to be submitted. It is considered that development of the site is not likely to have a major adverse effect against SA objective 1 (biodiversity). It should be noted that SHLAA site 3247 is at its closest point some circa 600m from Biss Wood and there is the ability for mitigation measures to reduce any effect on the woodland.

There are no other environmental designations relevant to the site and therefore the proposed development is not likely to have a moderate-major adverse effect against any of the Council's other SA objectives. A Landscape and Visual Impact Assessment (LVIA) has been prepared to support the emerging planning application. The LVIA concludes that there will be no significant effects in respect of changes to landscape character associated with the proposed development. The option is likely to have a minor adverse effect against SA objective 7 (landscape) because mitigation measures are achievable to reduce the significance of effects. The site is well contained and the proposed development includes a substantial landscape buffer to Blackball Brook to the north.

Due to the high capacity of the site to contribute to local housing needs and potential to accommodate proposed non-residential uses (such as a primary school, care home, pub) the site option is likely to have a moderate-major positive effect against objectives 8 (housing), 11 (economic growth) and 12 (employment).

Table 5.1.2.1 Proposed Sustainability Appraisal of SHLAA Site 3247

SHLAA Ref	Capacity	SA Objective											
		1	2	3	4	5	6	7	8	9	10	11	12
3247	250-350	--	-	-	-	-	-	-	+++	-	-	++	++

Persimmon Homes notes Trowbridge Town Council's comments to this consultation in support of the allocation of SHLAA site 3247 for residential development as a "logical extension to the town" (Trowbridge Town Council representations to draft Wiltshire Housing Site Allocations Plan consultation, dated 5 September 2017). These representations are made following a public consultation event held by Persimmon Homes at Trowbridge Civic Centre on 25 May 2017 where the development proposals were presented and discussed with the local community.

The option at Biss Farm represents a more sustainable location for housing development than the other options in Trowbridge put forward for allocation in the draft Plan. By way of example, the draft Plan identifies land east of Southwick Court (SHLAA site 3565) despite likely moderate adverse effects against sustainability objectives 1, 2, 6, 7 and 9. Of particular concern is the potential of the development of the Southwick Court option to result in significant adverse effects on the historic environment and landscape at this rural edge location. The Council's SA comments on these matters as follows "The site includes a number of features plotted on the Wiltshire and Swindon Historic Environment Record which relate to a post-Medieval water meadow system. Southwick Court lies immediately to the south of the site and contains a number of important heritage assets including a Medieval moat and farmstead of which the farmhouse is Grade II* Listed. A Heritage Impact Assessment and archaeological assessment would be required (SA Obj. 6). The site functions as a green infrastructure corridor. The fields are large and open in character and exhibit a strong relationship with the Lambrok Stream (and its floodplain)/Southwick Court. Development of the site would lead to an urbanising effect. The stream and its floodplain, along with mature hedgerows/trees help define a logical edge to the current built framework in landscape terms. Mitigation of landscape and visual impacts could be problematic (SA Obj. 7)." This assessment is not favourable and raises concerns as to whether the site is developable. Trowbridge Town Council also opposes the allocation of site 3565.

Attached files (Please see Objective)

4734054

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The Plan is considered to be unsound and we wish to provide oral evidence.

Comment ID:	2669	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Persimmon Homes (Wessex)		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Persimmon Homes supports the identification of land for housing at land to the east of Farrells Field, Yatton Keynell (SHLAA site 482). The site offers a suitable location for residential development and is available now for development.</p> <p>According to Wiltshire Council's Housing Land Supply Statement (March 2017) there is an indicative remaining requirement of some 153 dwellings still to be identified in the Chippenham Community Area 'Remainder' (rural) area. Yatton Keynell is one of five Large Villages in the Chippenham Community Area and as recognised in the Council's Topic Paper Yatton Keynell offers a sustainable location to contribute to the delivery of this housing requirement, however there are currently no undeveloped sites with an allocation or permission at the village.</p> <p>Further to this, there is not an emerging or adopted Neighbourhood Plan at Yatton Keynell and therefore identification within a Wiltshire Council Site Allocations Plan represents the only way forward for a modest and sustainable level of plan-led development at the settlement.</p> <p>The Council's SA demonstrates that there are limited alternative sites at the village and that land east of Farrells Field represents the most sustainable option for new housing. The site is outside of the Cotswolds Area of Outstanding Natural Beauty, which washes over the north of the village. The site is well contained by boundary vegetation which limits the potential for views into the site.</p> <p>The intention is to access the site from the existing development of Farrells Fields.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		The Plan is considered to be unsound and we wish to provide oral evidence.			

Comment ID:	2670	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It is recommended that the proposed allocation red line be amended to remove the track running along the western boundary of the site, to ensure that the masterplanning and development of the site can proceed on a sound basis				
Attached files (Please see Objective)	4734057				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.				

Comment ID:	2671	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - SHLAA SITE 600 – LAND AT SUTTON LANE, SUTTON BENGER		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>According to Wiltshire Council's Housing Land Supply Statement (March 2017) there is an indicative remaining requirement of some 153 dwellings still to be identified in the Chippenham Community Area 'Remainder' (rural) area. Sutton Benger is one of five Large Villages in the Chippenham Community Area however the Council's Topic Paper concludes that despite the availability of potentially suitable development sites, Sutton Benger should not be carried forward for further assessment.</p> <p>The reasons given for not taking Sutton Benger forward relate to the higher proportion of recent growth at the settlement compared to other Large Villages in the Community Area and concerns regarding the capacity of the local Primary School.</p> <p>According to the Council's Topic Paper the number of dwellings at Sutton Benger is set to grow by 27% over the twenty year plan period 2006-2026. Whilst it is evident that this is a greater proportionate increase than the other villages in the Chippenham rural area, this is not a reasonable justification for eliminating the settlement from further consideration. Sutton Benger is a highly sustainable location which benefits from a good range of services and amenities not common to all Large Villages (including a Primary School, Doctor's Surgery, Recreation Ground, Hotel, Pub and Restaurants), yet no weighting is afforded to the relative sustainability of the settlement. Furthermore, it is unclear whether this proportion of growth is disproportionate to the level of growth in other North and West Wiltshire Large Villages, particularly in rural areas where the 'indicative' housing requirement has been met such as in the Calne, Corsham and Trowbridge Community Areas (the respective Topic Papers do not provide this data).</p> <p>The draft Site Allocations Plan identifies only two sites within the Chippenham Community Area rural area, which have a combined capacity for approximately 80 dwellings. This is some 73 dwellings short of the 153 dwelling remaining requirement set out in the Council's latest Housing Land Supply Statement for the area. The land at Sutton Lane (SHLAA site 600) is available and developable now and has the capacity to address this shortfall.</p> <p>The draft Site Allocations Plan has allocated other sites in the county where primary school capacity is an issue (e.g. Trowbridge). This is not a sound reason to not allocate land for new homes.</p> <p>The site has not been subject to detailed SA; however the table below sets out a proposed assessment against the Council's sustainability objectives. There are not considered to be any moderate or major adverse effects of developing the site.</p> <p>There are no environmental designations at the site and there is no known priority habitat on the site (SA objective 1). Sutton Meadows SSSI is approximately 530m south of the site and the potential for impact would need to be assessed however it is considered that this can be adequately mitigated.</p> <p>The site is outside but adjacent to the Sutton Benger Conservation Area. The option would likely have a minor adverse effect against SA objective 6 (historic environment) because mitigation measures are achievable to reduce the significance of effects. Despite the site's location adjacent to the Conservation Area there are no Listed Buildings within 200 metres of the site.</p> <p>The site is not located within an Area of Outstanding Natural Beauty and there are no Tree Preservation Orders on the land.</p>				

The site is located close to the village centre and its services and amenities. There is an existing public footpath running through the site (SBEN19A), which could be enhanced through the development of the land. Vehicular access to the site would be taken from Sutton lane which runs along the eastern boundary.

Table 4.2.1.1 Proposed Sustainability Appraisal of SHLAA Site 600

SHLAA Ref	Capacity	SA Objective												
		1	2	3	4	5	6	7	8	9	10	11	12	
600	80	-	-	-	-	-	-	-	-	+++	-	-	++	+

As noted in the Council's Topic Paper, the emerging Sutton Benger Neighbourhood Plan is not at an advanced stage in its preparation and should therefore not be relied on to identify land for housing.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The Plan is considered to be unsound and we wish to provide oral evidence.

Comment ID:	2672	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes								
		Persimmon Homes (Wessex)		Do you consider the draft WHSAP is sound?	No								
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared									
Please identify the policy, paragraph, table, figure or site to which you are referring.		Westbury CommunityArea Remainder		Justified									
				Effective									
				Consistent with national policy									
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Westbury has suitable sites for development and that further housing at the town would not undermine the spatial strategy of the Wiltshire Core Strategy. There are other Market Towns in Wiltshire that have a greater number of completions and developable commitments than Westbury (such as Melksham, also in the North and West HMA). The Principal Settlements of Chippenham, Trowbridge and Salisbury all have a far greater level of committed housing land than the Market Towns in the county and therefore further development can be identified at the Market Towns without undermining the settlement hierarchy. The strategy for the allocation of sites to meet the identified local need should be focused on the spatial strategy set out in the Core Strategy and not the indicative number of dwellings assigned to each settlement and Community Area. Westbury is a market town defined as having the ability to support sustainable patterns of living and the potential for ‘significant’ development that will increase the jobs and homes to help sustain and where necessary enhance their services and facilities and promote better levels of self containment.</p> <p>However, the council have sought not to identify any sites for development, within this DPD, on the basis that the ‘indicative’ requirement has already been met. This is considered unsound as the approach conflicts with the local plan which states that the ‘indicative’ requirements should not prevent sustainable development proposals coming forward that can contribute to delivering the strategic objectives of the plan.</p> <p>The Principal Settlement of Trowbridge also falls within the North and West Housing Market Area and is only 5mins away via rail and 15mins via road from Westbury. The housing requirement for Trowbridge Town between 2006 and 2026 is 6,810. The residual remainder to be identified is 2,020 homes (2017-2026) which equates to an annualised requirement of 224 per annum. The town has 1,825 developable commitments for the period up-to 2026 this equates to 202 dwellings per annum. In combination the council therefore requires 426 dwellings per annum to be delivered to meet its ‘indicative’ requirement. From the period 2006-16 Trowbridge has delivered an average of 270 per annum some 156 dwellings short of the requirement.</p> <p>The allocation of an additional 800 units to the town at sites divorced from the town centre and subject to considerable constraint will not serve to overcome this issue. The council appear to have given no consideration of the ability of localised housing markets to take-up the quanta of housing proposed. Based on previous delivery rates and the size of the settlement it is clear that Trowbridge will not be able to deliver the level of growth proposed in the plan period. A more reasonable alternative appears to be the disaggregation of a proportion of the housing requirement to an alternative location within the same HMA. Westbury provides this opportunity with only 931 developable commitments equating to only 103 dwelling per annum compared to 426 required at Trowbridge.</p> <p>Table 2.5.1 Comparison of towns within the North and West Wiltshire HMA (Completions)</p> <table border="1"> <thead> <tr> <th>Rank</th> <th>Completions</th> <th>Settlement</th> <th>Position in settlement hierarchy</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Rank	Completions	Settlement	Position in settlement hierarchy				
Rank	Completions	Settlement	Position in settlement hierarchy										

	2006-2017		
1	2,789	Trowbridge	Principal Settlement
2	1,279	Melksham	Market Town
3	1,136	Chippenham	Principal Settlement
4	910	Calne	Market Town
5	898	Royal Wootton Bassett	Market Town
6	793	Westbury	Market Town
7	577	Warminster	Market Town
8	575	Corsham	Market Town
9	504	Malmesbury	Market Town
10	374	Bradford on Avon	Market Town

Source: Wiltshire Housing Land Supply Statement, March 2017

Table 2.5.1 Comparison of towns within the North and West Wiltshire HMA (Planned)

Rank	Completions and developable commitments 2006-2026	Settlement	Position in settlement hierarchy
1	4,851	Chippenham	Principal Settlement
2	4,766	Trowbridge	Principal Settlement
3	2,106	Melksham	Market Town
4	1,597	Calne	Market Town
5	1,458	Warminster	Market Town
6	1,457	Westbury	Market Town
7	1,234	Corsham	Market Town

	8	1,156	Royal Wootton Bassett	Market Town
	9	1,015	Malmesbury	Market Town
	10	600	Bradford on Avon	Market Town
Source: Wiltshire Housing Land Supply Statement, March 2017				
Attached files (Please see Objective)				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.			

Comment ID:	2673	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes																																									
		Persimmon Homes (Wessex)		Do you consider the draft WHSAP is sound?	No																																									
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared																																										
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - SHLAA SITE 268 - LEIGH PARK (LAND WEST OF DARTMOOR ROAD)		Justified																																										
				Effective																																										
				Consistent with national policy																																										
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council has not considered any sites at Westbury town in the preparation of the draft Wiltshire Site Allocations Plan. SHLAA site 268 offers the potential to make a moderate contribution to the land supply in the North and West Wiltshire HMA in accordance with objective 2 of the draft Plan.</p> <p>A full planning application (Ref: 16/08998/FUL) at Land West of Dartmoor Road for a residential development comprising 26 dwellings and associated landscaping was refused by Wiltshire Council on 21 September 2017.</p> <p>The only reasons for refusal relate to the principle of development due to the location of the site outside the existing Limits of Development and therefore a conflict with Core Policies 1, 2 and 32 of the Wiltshire Core Strategy. As detailed in the Officer's Report, there are no other officer objections to the scheme following amendments made to the layout and design during the determination process.</p> <p>The site is located in a sustainable location on the edge of the existing settlement of Westbury close to services and amenities within the town including the adjacent Primary School. As confirmed by the Officer's Report the proposed access to the site is safe and the transport impacts of the development are acceptable. Following amendments made to the design of the scheme, the Council's landscape officer considered that the impacts could be successfully mitigated and that the landscape could be enhanced. The design, layout and mix of units are considered to be acceptable. The Council's ecology officer supports the proposal to manage and enhance the degraded area of land to the west of the application site as part of any permission on the site, which will be secured through an Ecological Management Plan. The Officer's Report considered that the scheme provided and maintained acceptable levels of residential amenity. The Council's land drainage engineer raised no objection to the scheme. The quantum and mix of affordable housing was accepted by the Council. The Section 106 Heads of Terms are agreed in principle. The site therefore represents an excellent opportunity to contribute to the five year land supply, subject to a change in planning policy position through the allocation of the site or an amendment to the settlement boundary.</p> <p>The site has not been subject to detailed SA; however the table below sets out a proposed assessment against the Council's sustainability objectives. There are no moderate or major adverse effects of developing the site.</p> <p>Table 5.3.1.1 Proposed Sustainability Appraisal of SHLAA Site 268</p> <table border="1"> <thead> <tr> <th rowspan="2">SHLAA Ref</th> <th rowspan="2">Capacity</th> <th colspan="12">SA Objective</th> </tr> <tr> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> <th>9</th> <th>10</th> <th>11</th> <th>12</th> </tr> </thead> <tbody> <tr> <td>268</td> <td>26</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>+++</td> <td>-</td> <td>-</td> <td>++</td> <td>+</td> </tr> </tbody> </table>					SHLAA Ref	Capacity	SA Objective												1	2	3	4	5	6	7	8	9	10	11	12	268	26	-	-	-	-	-	-	-	-	+++	-	-	++	+
SHLAA Ref	Capacity	SA Objective																																												
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268	26	-	-	-	-	-	-	-	-	+++	-	-	++	+																																

Attached files (Please see Objective)	4734070 / 4734065
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The Plan is considered to be unsound and we wish to provide oral evidence.

Comment ID:	2674	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes																																								
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No																																								
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared																																									
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - SHLAA SITE 3205 - MANE WAY		Justified																																									
				Effective																																									
				Consistent with national policy																																									
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site totals approximately 65 acres. The site is relatively flat and does not have any impact on the wider landscape or views into or out of the site. The site is well enclosed and is bound by the railway line to the north, Mane Way to the east; the doctor's surgery and the A3098 to the south and agricultural land/associated buildings to the west with the railway line beyond. There is a scheduled ancient monument to the east of the site which will need to be retained and protected.</p> <p>Persimmon Homes have undertaken a setting assessment of the Penleigh monument. The illustrative buffer is reflective of this assessment. The buffer will safeguard a view corridor between the moat and historic buildings at Penleigh (should vegetation be removed in the future). It is also anticipated that a Management Plan for the moat will be submitted as part of any application, or commit to doing this at a fixed point in the future. This will ensure the ongoing preservation of the monument alongside a commitment to interpretation panels to aid the public understanding of the monument.</p> <p>The Station Road strategic allocation lies to the north which includes the 'provision of a link road connecting Station Road and Mane Way, via a new railway bridge crossing'. The outline application for land at Station Road includes an 'illustrative layout' which shows a new bridge over the railway line.</p> <p>The delivery of the missing road link forms one of the key objectives identified in the Local Plan and is a long-term objective of planning policy in Westbury and saved policy T4 from the West Wiltshire District Plan makes it clear that this should be funded by new development. Having considered the viability of delivering a 350 unit scheme on land west of Mane Way it is proposed that the development could help deliver the bridge funding gap and the land contribution to deliver the bridge.</p> <p>Table 5.3.2.1 Proposed Sustainability Appraisal of SHLAA Site 3205</p> <table border="1"> <thead> <tr> <th rowspan="2">SHLAA Ref</th> <th rowspan="2">Capacity</th> <th colspan="12">SA Objective</th> </tr> <tr> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> <th>9</th> <th>10</th> <th>11</th> <th>12</th> </tr> </thead> <tbody> <tr> <td>3205</td> <td>350</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>--</td> <td>-</td> <td>+++</td> <td>-</td> <td>-</td> <td>++</td> <td>+</td> </tr> </tbody> </table>					SHLAA Ref	Capacity	SA Objective												1	2	3	4	5	6	7	8	9	10	11	12	3205	350	-	-	-	-	-	--	-	+++	-	-	++	+
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3205	350	-	-	-	-	-	--	-	+++	-	-	++	+																																
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If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

The Plan is considered to be unsound and we wish to provide oral evidence.

Comment ID:	2675	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes																																									
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No																																									
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared																																										
Please identify the policy, paragraph, table, figure or site to which you are referring.	Omission site - SHLAA SITE 272 - FAIRDOWN AVENUE (SHLAA SITE 272)			Justified Effective Consistent with national policy																																										
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council has not considered any sites at Westbury town in the preparation of the draft Wiltshire Site Allocations Plan. SHLAA site 272 offers the potential to make a moderate contribution to the land supply in the North and West Wiltshire HMA in accordance with objective 2 of the draft Plan.</p> <p>In accordance with paragraph 47 of the NPPF the site is available now, offers a sustainable location for development and is achievable with a realistic prospect that housing can be delivered on the site within five years.</p> <p>Table 5.3.3.1 Proposed Sustainability Appraisal of SHLAA Site 272</p> <table border="1"> <thead> <tr> <th rowspan="2">SHLAA Ref</th> <th rowspan="2">Capacity</th> <th colspan="12">SA Objective</th> </tr> <tr> <th>1</th> <th>2</th> <th>3</th> <th>4</th> <th>5</th> <th>6</th> <th>7</th> <th>8</th> <th>9</th> <th>10</th> <th>11</th> <th>12</th> </tr> </thead> <tbody> <tr> <td>272</td> <td>44</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>+++</td> <td>-</td> <td>-</td> <td>++</td> <td>+</td> </tr> </tbody> </table>					SHLAA Ref	Capacity	SA Objective												1	2	3	4	5	6	7	8	9	10	11	12	272	44	-	-	-	-	-	-	-	-	+++	-	-	++	+
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Comment ID:	2676	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Royal Wootton Bassett CATP		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The Royal Wootton Bassett and Cricklade Community Area Topic Paper states that the Purton Neighbourhood Plan has reached area designation stage. This should be updated to reflect the latest position which is that the draft Neighbourhood Plan has been submitted to Wiltshire Council and allocates SHLAA site 436 for residential development. A full planning application (Ref: 1610513/FUL) at Land at Restrop Road for a residential development comprising 38 dwellings is currently under consideration by Wiltshire Council.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2677	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Persimmon Homes supports the identification of Clover Lane for residential development In accordance with paragraph 47 of the NPPF the site is available now, offers a sustainable location for development and is achievable with a realistic prospect that housing can be delivered on the site within five years.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2678	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.3 Market lavington SBR			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Persimmon Homes supports the inclusion of the Fiddington Hill nursery within the proposed revised settlement boundary (grid reference L5).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2679	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.33 Malmesbury SBR		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.		Persimmon Homes objects to the proposed removal of the area of land to the south of Verona House which has an extant employment planning permission (grid reference E4).			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2680	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex) Person ID: 983136		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A.48 Trowbridge SBR	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Persimmon Homes objects to the proposed removal of the land to the south of Blackthorn Way (Staverton Triangle) from the Trowbridge settlement boundary (grid reference I4).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2681	Consultee Mr and Mrs N Sykes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134057	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified- The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent- The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection. For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2682	Consultee Mr and Mrs N Sykes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134057	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified- The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent- The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection. For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2683	Consultee Mr James Proyer Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Persimmon Homes (Wessex)		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Persimmon Homes proposes an amendment to the settlement boundary at Westbury. The existing western edge of the settlement boundary follows the railway line and the A3098 (Mane Way). This existing infrastructure forms a physical boundary to the built edge of the town along this route. There is however a parcel of land to the east of Mane Way that is excluded from the existing boundary (grid reference D14). The review of the settlement boundary offers the potential to correct what is assumed to be a drafting error from the preparation of the previous local development plan, and therefore an amendment to the proposed settlement boundary is sought.</p> <p>This proposed change would be consistent with the Council's draft settlement boundary review methodology (Topic Paper 1, Table 5.1) which states "Where practical, the draft settlement boundaries follow clearly defined physical features, such as, walls, fences, hedgerows, roads and water courses in order to define the built area of the settlement." Indeed the Westbury Community Area Topic Paper identifies a number of amendments to the existing settlement boundary for this reason, stating "Amend boundary to follow but not include clearly defined physical features - the road".</p> <p>This justification is relevant to the amendment proposed in the attached plan. Appendix 7.4.1 – proposed amendment to Westbury Town Limits of Development</p>				
Attached files (Please see Objective)	4734090				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2684	Consultee Mrs Sarah Smith Person ID: 1134131	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.14			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am utterly astounded to hear that this is even under consideration. If permission has already been refused on the grounds of 'preserving the character and scenic quality of the landscape' twice and nothing has changed - why on earth are we here again?</p> <p>The Council stated in its Core Policy just two years ago that 'it does not wish to deliver strategic housing in either large or small villages in the county', so why are you going back on your word?</p> <p>This site is totally unsuitable. The B3098 cannot cope with the increase in traffic that these houses will produce, let alone the heavy vehicles involved in the construction of this site. There will be serious environmental consequences with air pollution caused by increased CO2 emissions.</p> <p>An estate of this size is NOT needed in this village. We have had two new estates in recent years, Chestnut Corner and Pear Tree Orchard; surely we have fulfilled our responsibility with regards to housing. Furthermore, I understand that plans are already underway for additional housing at the Pear Tree site. To suggest that this is the ONLY suitable site in the Westbury area is ridiculous. Westbury itself is currently under mass development with a huge estate on Bitham Park and another proposed on MOD land on the other side of town. Bratton does not have the infrastructure to support this level of house building. Healthcare services are a particular concern and woefully inadequate in both Bratton and Westbury.</p> <p>The countryside in this area is beautiful, and rich in both archaeology and flora and fauna. Featured in television adverts and admired by locals and tourists alike, this will be ruined! Have the consequences for the wildlife of this area been considered? What will the impact be on our historic landscape?</p> <p>I AM STRONGLY OPPOSED TO THIS DEVELOPMENT</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2685	Consultee Mr & Mrs Emberson Person ID: 1134103	Agent Mr Matt Williams Planning Partner Brimble, Lea & Partners Person ID: 931633	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation relates to the exclusion of SHLAA Site 3516 and the West Warminster Urban Extension allocation (WWUE) from the revised settlement boundary for Warminster.</p> <p>According to Table D.4 in the Warminster Community Area Topic Paper – Warminster (June 2017) (WCATP), Site 3516 was graded red under exclusionary criteria 1 because the "Site is detached from the built edge of the town".</p> <p>According to exclusionary question 1, the test in this case is whether the site is isolated from the urban edge of the settlement i.e. not adjacent to the settlement boundary and not adjacent to a SHLAA site that is. The stated consideration about the site's relationship to the built edge is therefore incorrect as the exclusionary question asks about the site's relationship to the urban edge of the town.</p> <p>Site 3516 is not isolated from the urban edge of the settlement as it lies immediately opposite Crusader and Warminster Business Parks which have been specifically included in the revised settlement boundary for Warminster which, according to Table A.1 in the WCATP, is because the area of built employment development is physically related to the settlement. It therefore follows that Site 3516, which is immediately opposite the business park, is also physically related to the settlement and, significantly, is adjacent to this revised settlement boundary. This is well illustrated in the enclosed extract of the map of Warminster SHLAA sites in Appendix B of the Warminster Community Area Topic Paper.</p> <p>As such, the Site should have been graded green and proceeded to the subsequent assessments. It would have then passed all of the subsequent stage assessment criteria on the basis that a recent application for outline planning permission to develop the Site was only refused on the basis that it was outside the settlement boundary defined in the Core Strategy, thereby confirming that there are no constraints or technical objections to the development of the site as a matter of principle (reference 16/12036/OUT). In summary, the site constitutes previously developed land in a sustainable location in terms of accessibility to local services and facilities by means other than the car. For these reasons alone, the site should have been included within the revised settlement boundary for Warminster.</p> <p>Notwithstanding the Site's relationship to the business parks included within the revised settlement boundary, and the recently tested merits of the site as a matter of principle, the site is adjacent, and actually partly within, the WWUE allocation. This is highlighted in the enclosed extract of the Warminster Proposals Map in the adopted Core Strategy. The Council is absolutely dependent on this allocation coming forward as part of its supply of housing and the Site will therefore be seen in the context of a significant urban extension and established business parks. The Site is therefore consumed by existing and forthcoming urban development and not in an isolated countryside location divorced from the town, as the Council allege.</p> <p>On the subject of the WWUE allocation, it has been noted from the Topic Paper 1 – Settlement Boundary Review Methodology (June 2017) that the draft settlement boundary review methodology, developed from a consideration of consultation feedback and the policy and best practice reviews, proposed to include site allocations identified in the development plan. However, it would seem that many of those who responded to the informal consultation disagreed with the inclusion of site allocations within the settlement boundary for reasons similar to that behind their opposition to the inclusion of unimplemented planning permissions which, in summary, was because of the uncertainty around the final built form of any development.</p>				

	<p>There are a number of reasons why individual planning permissions may not be implemented although there is certainty that site allocations will come forward and whilst the actual built form of the allocation may be unknown, Site 3516 will be seen in the context of this urban extension. Even if the site is adjacent to open space or recreation areas, these spaces/areas will be seen in the context of the built environment of the extended town and will not relate more closely to the open countryside. As such, the WWUE allocation should also be included within the revised settlement boundary of Warminster.</p> <p>The Site Allocation Plan runs contrary to the Government's stated commitment in the Housing White Paper that policies and plans should allow a good mix of sites to come forward for development, particularly noting that small sites were particular opportunities for custom builders and smaller developers. A review of the Site Allocations Plan, however, reveals that not one single small site (i.e. less than 10 dwellings) has been allocated. Of the 24 sites allocated, 14 (58%) are for 10-50 dwellings which suite medium-sized builders and the remaining 10 are for more than 50 dwellings which only suits medium-large developers. Given the Government's clear policy direction of travel and the Council's traditional reliance on small sites, the decision to not allocate any small sites runs contrary to national policy.</p> <p>The inclusion of SHLAA Site 3516 and the WWUE allocation would be a justified inclusion within the revised settlement boundary for Warminster and would consequently make the Wiltshire Housing Site Allocations Plan sound. The inclusion of the allocation would, of course, have ramifications for other parts of the Plan where allocated sites have been excluded from the revised settlement boundaries. However, unlike speculative permissions which may lapse for a number of reasons, the Council is absolutely dependent on site allocations coming forward for development to satisfy the national planning policy requirement to boost significantly the supply of housing by, inter alia, identifying specific deliverable and developable sites to provide the full, objectively assessed needs for housing as such, there is no justifiable reason for excluding site allocations from the settlement boundaries. It is also noteworthy that the initial settlement boundary review methodology, which was correctly based on policy and best practice reviews, included site allocations which supports this representation.</p>
<p>Attached files (Please see Objective)</p>	<p>4734129 / 4734128</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>It is considered necessary to participate to discuss the merits of SHLAA Site 3516 given its very clear relationship to the established business parks on the opposite side of Bath Road and the WWUE allocation to the rear and side (noting that part of the site is within the strategic allocation and therefore inherently accepted as being sustainable).</p>

Comment ID:	2686	Consultee Mrs Sarah Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1134131		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		This site is totally unsuitable. The B3098 cannot cope with the increase in traffic that these houses will produce, let alone the heavy vehicles involved in the construction of this site.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2687	Consultee Mrs Sarah Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1134131		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There will be serious environmental consequences with air pollution caused by increased CO2 emissions.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2688	Consultee Mrs Sarah Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1134131		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Effective				
Attached files (Please see Objective)	Consistent with national policy				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The countryside in this area is beautiful, and rich in both archaeology and flora and fauna. Featured in television adverts and admired by locals and tourists alike, this will be ruined. Have the consequences for the wildlife of this area been considered? What will the impact be on our historic landscape?				

Comment ID:	2689	Consultee Mrs Sarah Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1134131		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The countryside in this area is beautiful, and rich in both archaeology and flora and fauna. Featured in television adverts and admired by locals and tourists alike, this will be ruined! Have the consequences for the wildlife of this area been considered? What will the impact be on our historic landscape?			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2690	Consultee Mrs Sally Lawton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1134147		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No evidence of housing need for Yatton Keynell.</p> <p>Appendix E of the Chippenham Community Area topic paper) confirms that no local housing needs survey was undertaken as part of the plan. The proposed dwellings should be justified with evidence that there is a specific local need.</p> <p>Paragraph 158 of the NPPF which states: 'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic , social and environmental characteristics and prospects of the area. Strategies for housing and other uses are integrated and they take into account relevant market and economic signals'</p> <p>Withdraw land at East of Farrells Field and allow a neighbourhood plan to be prepared giving local residents opportunity to explore other site options in a proactive way in line with NPPF para 155.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2691	Consultee Mrs Sarah Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1134131		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The countryside in this area is beautiful, and rich in both archaeology and flora and fauna. Featured in television adverts and admired by locals and tourists alike, this will be ruined! Have the consequences for the wildlife of this area been considered? What will the impact be on our historic landscape?			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2692	Consultee Mrs Sally Lawton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1134147		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Lack of a Neighbourhood Plan At a Parish Council meeting back in November 2014 there was a call for a Neighbourhood Plan to be made so that residents can engage in how many and where future housing might take place. Relevant National Policy in conflict with Para155 of NPPF. In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2693	Consultee Mrs Sally Lawton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1134147		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Site selection process unsound.</p> <p>Sutton Benger has an identified need and no housing has been allocated. Yatton Keynell as no identified need yet 30 houses are proposed</p> <p>Relevant National Policy in conflict with Para159 of the NPPF.</p> <p>Withdraw land at east of Farrells Field and allow a neighbourhood plan to be prepared giving local residents opportunity to explore other site options in a proactive way in line with NPPF para 155.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2694	Consultee Mrs Sally Lawton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1134147		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Infrastructure issues</p> <p>Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area.</p> <p>Withdraw land at east of Farrels Field and allow a neighbourhood plan to be prepared giving local residents opportunity to explore other site options in a proactive way in line with NPPF para 155.</p>			
Attached files (Please see Objective)				Effective	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?				Consistent with national policy	

Comment ID:	2695	Consultee Mrs Sally Lawton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1134147		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Poor consultation None of the Parish Council's from the five villages in the Chippenham Community Area responded to Wiltshire Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement. Relevant National Policy in conflict with Para155 of NPPF. Withdraw land at east of Farrels Field and allow a neighbourhood plan to be prepared giving local residents opportunity to explore other site options in a proactive way in line with NPPF para 155.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2696	Consultee Mrs Sally Lawton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1134147		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Proposal will have significant impact on the character of the area A large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area. Withdraw land at east of Farrells Field and allow a neighbourhood plan to be prepared giving local residents opportunity to explore other site options in a proactive way in line with NPPF para 155.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2697	Consultee Liz Pickering Forward Planning Manager Education & Skills Funding Agency Person ID: 1134169	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Comments on the Housing Site Allocations Plan (HSAP) 4. As you will be aware, the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan, with regard to it being positively prepared, justified, effective and consistent with national policy. The following detailed comments set out the ESFA's view of the plan's soundness in respect of education provision. 5. The ESFA supports the Council's allocation and safeguarding of land for schools as set out in the following policies: H1.1, Land at Empress Way H2.1, Elm Grove Farm H2.11, Land at the Street, Hullavington H3.1, Land at Netherhampton Road 6. While the ESFA supports the safeguarding of land for schools, the plan is inconsistent in its approach to seeking developer contributions for construction costs of new schools and school expansions. For instance, paragraphs under housing sites (Chapter 5) sometimes refer to contributions being required to increase local school capacity, in addition to safeguarded land where appropriate, but this is missing elsewhere. If local school capacity is considered sufficient to accommodate the pupils generated by development, this should be explained in the document. However, where land is safeguarded within a development site because a need has been identified, the requirement for contributions to deliver the school should be explicit in the policy. To address these inconsistencies, the following minor modifications are recommended: Policies H1.1 (land at Empress Way), H2.1 (Elm Grove Farm), H2.11 (land at the Street, Hullavington) and H3.1 (land at Netherhampton Road) – include within the policies a requirement for school construction costs and the expected trigger point for delivery, and supplement the supporting text with cross-references to the Infrastructure Delivery Plan (IDP) and the Council's Section 106 Methodology. Policies H1.2, H1.3, H1.4, H2.5, H2.10, H2.12, H2.14, H3.5, H3.6 – make explicit reference in supporting text to the requirement for education contributions to increase local school capacity, or demonstrate that sufficient capacity exists to meet needs arising from new development. Reference should be made as appropriate (for example, paragraphs 5.44 and 5.128) on the impacts of development on secondary school provision, and how delivery will be secured. 7. The amendments recommended above would help demonstrate that the plan is positively prepared in seeking to meet objectively assessed infrastructure requirements, effective in setting clear delivery requirements, and justified based on proportionate evidence. Evidence base 7. The IDP has not been published alongside the HSAP for consideration as part of this consultation, though it is a crucial part of the evidence base. Published with the Community Infrastructure Levy (CIL) documents on the Council website, the IDP does not include an assessment of how many school places are generated by the sites in the HSAP, and how/where the places are to be delivered. Although updated in December 2016, the IDP does not appear to reflect additional housing in HSAP or the additional education infrastructure needs which have been identified. Prior to submission of the plan for examination, the Council should consider revising the IDP to include the latest forecast school construction				

and expansion projects and the costs of provision. In light of the reference in paragraph 5.16 to the expansion of special schools, it may also be beneficial to update the Council's Section 106 methodology to include pupil yield and provision costs for special school places, taking account of local evidence and national cost data.¹ This would support the Council's efforts in securing developer contributions and help to demonstrate that the plan is effective, justified and positively prepared.

The Council has produced various topic papers to support the HSAP. It would be helpful if a Planning for Schools topic paper could also be produced, expanding on the evidence in the Council's IDP (as revised) and explaining the interplay between CIL and Section 106 for education provision in Wiltshire. At present, the R123 list for CIL refers to some specific secondary school projects, implying that all other education contributions will be sought through Section 106 Agreements. The Planning Obligations SPD (2016) does not prevent this, though it recognises the legal limitations on pooling funds from Section 106 Agreements. A topic paper on Planning for Schools might also clarify how CIL and Section 106 have been considered in the Council's Viability Assessment, which appears to assign a nominal Section 106 charge of £1000 per dwelling, which is substantially below the amount that would be charged via Section 106 for primary education provision. The topic paper should set out clearly how the forecast housing growth at allocated sites has been translated (via an evidence based pupil yield calculation) into an identified need for specific numbers of school places and new schools over the plan period. This would help to demonstrate more clearly that the approach to the planning and delivery of education infrastructure is justified based on proportionate evidence. If required, the ESFA can assist in providing good practice examples of such background documents relevant to this stage of your emerging Plan.

Developer Contributions and CIL

One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments.

In the paragraphs above, the ESFA has requested modifications to the HSAP to ensure that sufficient developer contributions are sought in all cases. In the opinion of the ESFA, the HSAP and its evidence base do not at present demonstrate deliverability of education provision, or fully meet the tests of soundness, due to a lack of clarity and consistency with regard to developer contributions. The ESFA considers this to be rectifiable through minor modifications and updates to the evidence base as suggested above, ensuring that:

Policies require offsite contributions from all housing sites that do not provide an onsite school, where there will be insufficient school capacity to absorb the demand for school places generated by the development.

Free transfer of land to the Council and construction costs are to be provided by the development, including trigger points for delivery, on sites which include a school.

Clear references are made to the funding mechanism to be applied, whether Section 106 or CIL, and cross-references to the relevant evidence that justifies this approach.

The ESFA would be particularly interested in responding to any update to the IDP or review of infrastructure requirements, which will inform any CIL review R123 list. As such, please add the ESFA to the list for future consultations

See attached for full comments.

Attached files (Please see Objective)

4734326

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2698	Consultee Mrs Faye Symington	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133531		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The preparation for a project this size needs clarification as the impact on the local community and environment will be huge. The lack of detail and information is of concern as the area around Harnham junction, Exeter and College roundabouts, Downton, Blandford and Wilton roads us non-existent. These points are vital to public transport, hospital access, fire services, garages, shops, commuting, out-of-town stores and the building of 810+ houses over a period of time would congest the area beyond reasonable limits. The traffic involved in this project would be enormous and there is no possibility of the existing road enlarged to cope with this.</p> <p>Thus I consider this development has not been positively prepared.</p> <p>The said site is not effective as the impact on the city is too high. We rely on tourism many of which arrive by bus or train. How can an unsound project enhance the possibility of building on the assets of a medieval town? P + R sites are not near this site so cars would still be used, traffic problems would frustrate tour companies which would move to other cities. Stonehenge and Bath would be obvious choices. Time involved in queuing whilst building this enormous site would last for a long period and be unacceptable.</p> <p>The road system could be improved by linking the radiating roads from the city far enough out to encourage through traffic not to use the city as a rat run.</p> <p>I consider that the road, environment, drainage be given greater emphasis.</p> <p>To be sound the road system needs to be improved. Most of the city roads are not suitable for widening thus it would make sense to build roads on the circumference of the city to take through traffic before planning an enormous project like 1028. Common sense is needed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2699	Consultee Mrs Faye Symington Person ID: 1133531	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This project is not justified as development has already been undertaken in Wilton, Tidworth and in the city centre. There is still scope within the city boundary for sites to be developed. There are areas within the town that have remained undeveloped for a long time. I suggest that said areas either be used within a time scale (e.g. five years) or the landlord is liable to compulsory purchase and the side used for starter homes, flats or houses.</p> <p>Thus I do not consider that development on this scale is justified as all the amenities are already in place and would not cause the chaos that a new development would.</p> <p>I understand that national policy required a said number of houses to be built in each county. The development in Wilton, Tidworth and town centre plus smaller sites 3272 and 1027 would help towards our allocation.</p> <p>Salisbury is used as the 'fat cat' and bears a large allocation that is not sustainable.</p> <p>Not enough emphasis has been placed on the pointers that make this city difficult to develop with large numbers.</p> <p>I'm sure national policy requires level-headed thinking and a sensitive hand neither of which are evident with the current policy.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2700	Consultee Mrs Faye Symington	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1133531		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The farmland allocated is on a slope. With removal of the vegetation and replaced with buildings, roads, drives, pavements, school, roundabouts, Drs surgery et al would cause flooding in the plain. Drainage does not solve the problem as the water is just pushed down river. Dams, river widening is not effective (Dept of the Environment). Plus the erosion, dredging etc. makes development of this proportion unsound. The large scale development would cause more flooding in the plain. By covering a large percentage of ground with concrete, roads etc. the water would automatically be drained into the rivers. Building dams, lakes etc. would not contain the increased volume. They would also have to be dredged constantly to avoid flooding further down. As no plans have been suggested to plant trees to absorb excess water I presume that is not on the plans. This suggestion would require a large no of trees to counter this development. Perhaps 'environmental studies' could be encouraged at school/college and this turned into a countryside study area and used as an incentive to come to the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2701	Consultee Mr Peter White Develop6 Person ID: 1134177	Agent Mr Samuel Croft Principal Planner Willis & Co Person ID: 1126238	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - Yatton Keynell		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Develop6 are seeking to promote land in Yatton Keynell which could be provided alongside or in place of the allocation at East of Farrells Field, Yatton Keynell. The site is currently available and deliverable and it is the intention of Develop6 to prepare a pre-application submission which will be submitted in due course. An Access Appraisal of the site has been prepared and submitted as part of this representation.</p> <p>Site Description The proposed site allocation for development is located at Yatton Keynell off the B4039. The site is bordered to the north/east by agricultural fields and to the south/west by residential dwellings and the B4039. The site area proposed for development currently comprises part of an existing agricultural field.</p> <p>The exact design and composition of the proposed development has yet to be confirmed and will be the subject of any forthcoming planning application. However, the opportunity for residential use and the construction of up to approximately 40 dwellings has been identified and it is this number which has been assumed as the basis for the allocation and consideration within this report.</p> <p>An indicative site location plan is reproduced below: [see attached]</p> <p>Access to the existing site is taken approximately 15m north of the B4039/Blacksmith Close junction adjacent to Anvil Cottage in the form of a priority junction. The existing access (designated as right of way YKEY12) is approximately 4.1 metres wide narrowing to 3.4 metres and is restricted in width by residential dwellings directly adjacent to both sides of the road. Opposite the existing access, the northbound Farrells Field bus stop is present in addition to a telephone pole with bus flag affixed. A road grit bin, post-box and a public footpath sign are also present in the verge opposite the existing site access.</p> <p>In reviewing the Site Allocations Document, it was noted that two sites were considered as part of the allocation process, which were very closely related to the proposed allocation site (shown above). The first site at Land to East of Yatton Keynell (474a), which was the larger of the two site, was discounted early on in the process as it was not known who owned the land and whether it was available for development. The second site at Land adjacent to The Old Forge (474b) made it through the entire selection process and was assessed as being more sustainable. It would appear that the reason The Old Forge site was discounted at the latter stages was due to the fact that the site at Land East of Farrells Field was considered to be more sustainable and provide a greater number of benefits. Having reviewed the assessment criteria, Land East of Farrells Field scored higher in respect to the following Sustainability Appraisal (SA) objectives: Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures</p> <p>Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth</p> <p>It should be noted that the land adjacent to The Old Forge scored lower in respect to its impact upon the historic environment and landscape. The rest of this representation looks to take the proposed allocation site through the site selection process for the Chippenham Community Area Remainder to demonstrate how it would have scored in respect to Land adjacent to The Old Forge and Land East of Farrells Field. It follows the methodology outlined in Section Four of the WSA PSCONS18 Chippenham Community Area Remainder Topic Paper June 2017 and is also</p>			

	covered in more detail by Topic Paper 2: Site Selection Process Methodology. The proposed allocation site is considered in respect to these 12 objectives attached.
Attached files (Please see Objective)	4734336 / 4734205
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To update date the Inspector on the progress of the proposed allocation sites and to adequately present the benefits of sites in general.

Comment ID:	2702	Consultee Mr Peter White Develop6	Agent Mr Samuel Croft Principal Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1134177	Willis & Co Person ID: 1126238	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - Atworth		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Develop6 are seeking to promote land in Atworth. The site is currently available and it is the intention of Develop6 to prepare a pre-application submission which will be submitted in due course.</p> <p>The WHSA PSCONS23 Melksham Community Area Topic Paper June 2017 identifies that Core Policies 1 (Settlement Strategy) and 15 (Melksham Area Strategy) of the Wiltshire Core Strategy set out the settlement hierarchy for sustainable development in the Melksham Community Area, and associated indicative housing requirements.</p> <p>Core Policy 15 requires approximately 2,370 homes to be provided in the Melksham Community Area of which about 2,240 should occur at the Market Town of Melksham and Bowerhill village and approximately 130 homes in the rest of the community area over the Plan period 2006 to 2026.</p> <p>It goes on to set out that to date (between 2006 and 2017) 1,370 dwellings were delivered in Melksham and Bowerhill and an addition 101 were delivered in the remainder of the Melksham Community Area. This has resulted in a residual requirement of 1,221 dwellings in Melksham and Bowerhill, and 38 in the remainder of the Community Area which, as set out in table 2.2 of the Topic Paper, are all covered by developable commitments. This has been produced based upon Wiltshire's Housing Land Supply Statement Update (March 2017) which includes, at Appendix 6, a summary of completions, developable commitments, and the residual indicative requirement against each main settlement and Community Area.</p> <p>Appendix 1 of the Wiltshire's Housing Land Supply Statement provides a breakdown of the developable commitments by the individual site. From this information it would appear that the following sites would be contributing to the Melksham Community Area.</p> <p>3 Lowbourne – 17 units (2018/2019)</p> <p>303 Sandridge Common – 23 units (between 2016/17 and 2017/18)</p> <p>Forest and Sandridge School – 12 units (2016/2017)</p> <p>Former George Ward School Shurnhold – 261 units (between 2016/2017 and 2021/22)</p> <p>Land East of Spa Road – 450 units (between 2019/2020 and 2023/24)</p> <p>Land off Lewington Close and Longford Road – 12 units (2016/2017)</p> <p>Withleigh House Spa Road – 29 units (between 2018/19 and 2020/2021)</p> <p>Melksham small site units outstanding – 21 units in the plan period</p> <p>Melksham CA remainder small site outstanding - 23 units in the plan period</p> <p>Additional sites identified beyond the monitoring base date of 1 April 2016 also look to provide an additional 509 units, although it is not clear whether these sites will come forward within the plan period. Overall, this equates to 1,357 units which is less than the residual requirement of 1,259 set out in the Melksham Community Area Topic Paper. However, the figures only show 24 out 38 units being delivered in Melksham CA remainder, with the rest coming forward on smaller site. The 24 are to be delivered upon a single site in Semington which is only subject to outline permission.</p>				

Whilst any shortfall could be addressed by the developments in Melksham and Bowerhill this is not in line with Core Policy 15 which allocated 130 dwellings (38 residual) outside of these areas. This also does not take into account the deliverability of the sites which make up the developable contributions at Melksham and Bowerhill.

Section 5 and 6 of the Melksham Community Area Topic Paper summarises the outcome of the site selection process form Melksham and Bowerhill, and the Remainder of the Community Area, respectively.

Stage 1 of the site selection process to establish where housing site allocations may be needed during the rest of the Plan period. To do this, Stage 1 reviews the indicative residual requirement outstanding for Melksham and Bowerhill village. Generally the areas with an outstanding requirement to be met form the broad 'areas of search', which are then progressed for further assessment through Stage 2.

In respect to the Melksham and Bowerhill village and the remainder of the Community Area the report concludes that the residual requirement for the Melksham Community Area Remainder to be delivered during the Plan period has been met. Therefore, the Plan will not need to allocate additional land to help meet an indicative residua requirement.

Whilst it is accepted that the figure demonstrate that there are sufficient deliverable site in Melksham and Bowerhill to meet the minimum housing numbers, it is not considered that the deliverable commitments in the remainder of the are sufficient to meet the minimum target as set in Core Policy 15 and as such the plan should have sought to identify potential allocations in remainder of the community area.

Furthermore, the margins are very narrow so should any identified site not come forward in line with projections or should turn out not to be deliverable then the Council may not be able to deliver the housing requirement within the plan period. The proposed allocation site at Atworth is available and presents an opportunity to address some of this potential shortfall.

Site Description

The proposed site allocation for development is located at Atworth off Prospect Fields. The site is bordered to the south/east by agricultural fields and to the north/west by residential dwellings. The site area proposed for development currently comprises part of an existing agricultural field. The exact design and composition of the proposed development has yet to be confirmed and will be the subject of any forthcoming planning application. However, the opportunity for residential use and the construction of up to approximately 30 dwellings has been identified and it is this number which has been assumed as the basis for the allocation and consideration within this report.

An indicative site location plan is reproduced below: [see attached].

Conclusion

Develop6 are seeking to promote land in Atworth. The site is currently available and deliverable and it is the intention of Develop6 to prepare a pre- application submission which will be submitted in due course.

Whilst it is accepted that the figure demonstrate that there are sufficient deliverable site in Melksham and Bowerhill to meet the minimum housing numbers, it is not considered that the deliverable commitments in the remainder of the are sufficient to meet the minimum target as set in Core Policy 15 and as such the plan should have sought to identify potential allocations in remainder of the community area.

Furthermore, the margins are very narrow so should any identified site not come forward in line with projections or should turn out not to be deliverable then the Council may not be able to deliver the housing requirement in the plan period. The proposed allocation site at Atworth is available and presents an opportunity to address some of this potential short fall.

It is considered that the proposed allocation offers a reasonable option to the proposed strategy in order to address potential shortfall in housing numbers in the area and should be considered and assessed as part of the Housing Site Allocations Plan Pre-Submission Document going forward. To not do so would result in the plan being unsound by virtue of the fact that it will not have been positively prepared, would not be justified and would not be effective.

Attached files (Please see Objective)

4734407

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To update date the Inspector on the progress of the proposed allocation sites and to adequately present the benefits of sites in general.

Comment ID:	2703	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Greater flexibility should therefore be provided within the Site Allocations Local Plan to ensure that development opportunities in sustainable locations can be brought forward across the settlement hierarchy. [see attached for full representation]				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2704	Consultee Mr John Fleming Gladman Developments	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Gladman object to the proposed Housing Delivery Strategy, which introduces a number of restrictions to the growth of sustainable settlements. The proposed approach also uses tightly drawn settlement boundaries which would effectively preclude development that is well related to settlements and their associated services and facilities from coming forward. In particular, settlement boundaries should not be used to prevent otherwise appropriate development from coming forward in sustainable locations. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework. The overly restrictive approach proposed would result in a plan that is not positively prepared or effective and ultimately fails to deliver the housing required. Gladman are of the view that greater flexibility and contingency will be required to enable sustainable development to come forward and ensure that the full housing requirement is met over the plan period. It is essential that the site selection process acknowledges that the CS requirements are flexible and provide only an indicative approach which should not restrain Wiltshire's ability to maintain a five year housing supply and in doing so achieve the wider objectives of the Plan.</p> <p>Further to the above, it is essential that sustainable settlements across the hierarchy are enabled by the Local Plan to develop in a manner that will support and expand the range of services and facilities that can be accessed locally to meet the day-to-day needs of the population. It is therefore of concern that several sustainable options for site allocations in large villages and small villages have not been explored as reasonable alternatives through the plan making process and its associated sustainability appraisal. This is in direct conflict with Core Strategy Policy CP1, which sets out that sustainable development will take place to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. Indeed, Paragraph 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2705	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy and Settlement Boundary Review			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Gladman considers that the methodology for identifying site allocations is unduly rigid and creates an interpretation of the spatial strategy that is overly reliant on providing further development in Wiltshire's principal settlements, market towns and local service centres. A greater proportion of development should be directed to the</p> <p>In preparing its Housing Site Allocations Plan, the Council must take into account that in the Core Strategy the proposed distribution of housing below the Housing Market Area is simply indicative³ and that all sustainable settlements, whether large or small, can housing needs. It should instead take a flexible and positive approach to allocating land for development across its lower order villages and smaller rural settlements, recognising that the level of development considered acceptable in these locations should take account of their needs and ability to support further sustainable growth. Gladman is opposed to unduly restrictive policies that would prevent development from coming forward in some settlements whilst allowing for the expansion of others, contrary to the requirements of national policy and the cost/benefit approach to decision taking advocated by the Framework.</p> <p>Gladman contend that a positive approach to the distribution of housing is necessary and that this must more accurately reflect the needs and characteristics of individual settlements. In considering the distribution of housing growth it is important to note that a fundamental objective of the Framework is to secure a thriving rural economy by taking a positive approach to sustainable new development⁴.</p> <p>[see attached for full representation]</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2706	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Allocations			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Gladman consider that the proposed scale of site allocations in the emerging Wiltshire Site Allocations Plan is inadequate to satisfactorily demonstrate that the Local Plan minimum housing requirement will be met and a rolling five year housing land supply maintained within each of the three housing market areas. The Council will also need to provide clear justification for any delivery that might be expected from windfall sites. [see attached for representation in full]				
Attached files (Please see Objective)	4734586				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2707	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Implementation and Monitoring			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Section 7 of the Plan provides details of how the Council intends to manage and monitor the implementation of its Local Plan. As discussed elsewhere in these representations, it is the view of Gladman that further flexibility and contingency is required within the Plan in order to ensure that development needs can be met in full over the plan period. It is considered necessary for any such approach to include a clear monitoring and review mechanism within policy wording to ensure that the Local Plan is fully responsive to changes in circumstance relating to the development needs of the area and the maintenance of a five year housing land supply.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2708	Consultee Mr John Fleming Gladman Developments Person ID: 977912	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site submissions			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is a need for the Wiltshire Site Allocationsto be flexible to allow for changes in circumstances which include sites not coming forward as anticipated or delivering fewer units than expected. Typically, Inspectors are seeking an additional 20% above the housing requirement to ensure that the Local Plan meets or hopefully surpasses the housing requirement over the Plan period. In the case of Wiltshire, the OAN is known to be higher than the minimum requirement of 42,000 that is set out in the adopted Core Strategy. Furthermore, a wide number of sustainable opportunities exist across the settlement hierarchy that can support the delivery of the development needs of the area in full.</p> <p>Therefore, in order to account for all of the above factors, it is considered that the site selection process must be re-visited and that through this process, additional allocations made Plan to deliver housing over the remainder of the plan period to meet development needs in full and support the delivery of the vision and objectives of the Plan. This approach will contribute to securing the Council's 5-year housing land supply and allow a wider range of housebuilders (including those that are Small and Medium Sized) the opportunity to deliver sites across Wiltshire thereby increasing the range of products available and speeding up delivery in the county. It will also ensure a Plan that positively responds to the imperative to plan for thriving rural communities.</p> <p>Gladman are promoting a number of sites across the County which can each be successfully integrated into sustainable settlements and are available, achievable and deliverable. Further details relating to these sites are provided in the sections that follow [following representations]:</p> <ul style="list-style-type: none"> Land at Chippenham Road, Lyneham Land at Storridge Road, Westbury Land at High Street, Sutton Benger Land at Melksham Road, Holt Land at Wynsome Street, Southwick Land at Westbury Road, Great Cheverell 				
Attached files (Please see Objective)	4734586				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2709	Consultee Mr John Fleming Gladman Developments Person ID: 977912	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - Land at Chippenham Road, Lyneham			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Site at Chippenham Road, Lyneham is 12.63ha of land sitting on the north western edge of Lyneham and it fronts on to Chippenham Road to the north, is surrounded by the large military base of MOD Lyneham lying to the west and south west of the Site, which is a significant feature of the village.</p> <p>An outline application with all matters reserved except for access was submitted on this site on 31 March 2017 under the reference 17/03292/OUT for 235 dwellings, 2,600m² of B1 business use and 600m² of D1 community use.</p> <p>The Site comprises five fields and includes a collection of farm buildings, and is accessed off Chippenham Road, the main road through the north western part of Lyneham. A site location plan is provided below: [see attached]</p> <p>The site is relatively well contained by existing vegetation and built form, provides for a mix of uses and can be successfully integrated into the existing built form and landscape of area.</p> <p>The whole of the site is within Flood Zone 1 and surface water discharge rates will be managed via SuDS so that there is no increased risk of Flooding from this development.</p> <p>A suite of technical documents was submitted with the application that provide evidence that a sustainable development proposal can be brought forward on the site. Documents submitted include:</p> <ul style="list-style-type: none"> Design and Access Statement Landscape and Visual Impact Assessment Ecological Impact Assessment Arboricultural Assessment Transport Assessment Flood Risk Assessment Noise Assessment Air Quality Assessment Built Heritage Assessment Archaeological Assessment (and subsequent Trial Trenching Report) <p>These documents demonstrate that the site causes no undue harm and that the proposed development can be successfully integrated into the settlement. This is further demonstrated by the illustrative development framework for the site which is provided overleaf [see attached]</p> <p>Summary of opportunities</p> <p>Provision of high quality sustainable housing, with the site able to accommodate up to 235 new homes and associated green space.</p> <p>Opportunity to create a development that is well-related to the existing settlement of Lyneham.</p> <p>The provision of 2,600m² of B1 business use provision in Lyneham gives the opportunity to enhance and diversify its employment base, 600m² of D1 community use, to satisfy future needs within Lyneham.</p>				

	<p>Retention of the vast majority of the existing hedgerows and trees located within the site to maintain their ecological value</p> <p>Highways have approved the principle of a safe vehicular access point off Chippenham Road.</p> <p>New public open space including a multi-</p> <p>Provision of new recreation routes within the site.</p> <p>To provide new Sustainable Drainage System (SuDS) features which will form an integral part of the developments</p>
Attached files (Please see Objective)	4734586
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2710	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		omission site - Land at Storridge Road, Westbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Gladman consider that Land at Storridge Road, Westbury suitable for allocation through the local plan making process. Westbury is a sustainable settlement with a wide range of services and facilities. The proposed development site consists of a single 5.75ha arable field that lies to the North West of the settlement. It is a well contained site bound by residential properties on Storridge Road to the south, residential properties on The Ham to the east, the West Wilts Trading Estate to the west and open fields to the north. A location plan is provided below: [see attached]</p> <p>The site is located within Westbury, with strong linkages to both the town centres facilities and amenities and the employment areas. The site is also in close proximity to the station.</p> <p>The site will be accessed through a pair of semi-detached residential properties on Sturridge Road via a priority controlled junction and has an indicative capacity for 200 dwellings. The site is suitable, available and achievable and would see considerable delivery within 0-5 years of achieving planning consent.</p>				
Attached files (Please see Objective)	4712059				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2711	Consultee Mr John Fleming Gladman Developments	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - land at High Street, Sutton Benger			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This Site at Sutton Benger is 3.17ha of land sitting on the eastern edge of the settlement and it fronts on to High Street to the south, it is surrounded a series of arable fields to the east and north of the Site, and adjacent to the existing built form of development in Sutton Benger to the west.</p> <p>The Site comprises a single large arable field and includes a public footpath to the north running between Sutton Benger and Christian Malford. The site would be directly accessed off High Street, the main road through the center of Sutton Benger north western part of Lyneham. Sutton Benger is a sustainable settlement with a range of services and facilities and the site is considered to be suitable, available and achievable and could be delivered within 0-5 years of achieving planning consent. Through careful masterplanning, the site can be successfully integrated within the existing built and natural form and the proposal provides a sustainable development opportunity.</p> <p>A Site Location Plan is provided overleaf [see attached]</p>				
Attached files (Please see Objective)	4734586				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2712	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - Melksham Road, Holt			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The site comprises approximately 3.7 hectares of land, situated to the east of the village of Holt in Wiltshire. It is bordered by two roads, Melksham Road (B3107) to the north and Great Parks to the west. A site location plan is provided overleaf.</p> <p>An outline planning application was submitted for up to 98 dwellings with associated landscaping and open space, with all matters reserved, except for access. In December 2014. The application was resolved to be refused by Wiltshire Council in April 2015.</p> <p>At the time, an appeal was not perused. Gladman believe however that the reasons given for refusal, can be overcome by the submission of a new application, comprising additional and updated survey work to demonstrate there are no issues in relation to the reasons given.</p> <p>Technical documents submitted in support of the outline planning application included:</p> <ul style="list-style-type: none"> Site Location Plan Proposed Access Drawing Planning Statement Sustainability Assessment Socio-Economic Sustainability Statement Development Framework Plan Design and AccessPla Landscape and Visual Impact Appraisals Ecological Appraisal Archaeological Assessment Transport Assessment and Travel Plan Air Quality and Noise Assessment Phase 1 Site Investigation Flood Risk Assessment and Foul Drainage Analysis <p>Opportunities</p> <ul style="list-style-type: none"> Provision of high quality sustainable housing, with site access to accommodate up to 80 new homes (including policy compliant affordable percentage). Retention of the vast majority of the existing hedgerows and trees located within the site to maintain their ecological value. Opportunity to provide new safe and suitable vehicular access to the development via Great Parks. New area of publicly accessible open space, to include a children's play area Creation of new footways connecting into the existing PROW running through the site. Possibility of Sustainable Drainage System (SuDS) features which will form an integral part of the developments green infrastructure, designed to help maximise biodiversity benefits. 				

Attached files (Please see Objective)	4734586
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2713	Consultee Mr John Fleming Gladman Developments	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - Land at Wynsome Street, Southwick			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Site measures approximately 9.83 hectares and lies to the east of Southwick. The site has a developable area of 4.29 ha, which can accommodate up to 140 dwellings at a density of 33 dwellings per hectare.</p> <p>The site is considered to be suitable, available and achievable and can be delivered within 0-5 years. The proposal is currently the subject of a planning application (reference: 17/03269/OUT), which seeks outline planning consent for a high quality sustainable development comprising the following:</p> <p>Residential development for up to 140 dwellings</p> <p>Green Infrastructure (GI) including new areas of green space that will incorporate a new country park, ecological mitigation and habitat creation, retained hedges and trees, sustainable drainage features, play and recreation space. The site is bounded to the west by the village of Southwick, open fields to the north, Bradley Road Solar Park to the east and Wynsome Street/ Breach Lane to the south. Lambrok Stream runs along the western boundary. A site location plan can be seen below: [see attached]</p> <p>There are a large number of public footpaths and bridleways within the wider context of the Site which form an interlinked network of Public Rights of Way between Southwick, North Bradley and Trowbridge. Public Footpath SWCK3 crosses the Site and leads from Wynsome Street in the south west corner of the Site to the north-east corner of the Site, where it continues north until reaching the southern edge of Trowbridge. Access to the highway network can be taken off directly off Wynsome Street by way of a simple priority junction which has been agreed with the Local Highways Authority. The length of hedgerow that is being removed to facilitate access will be mitigate by substantial new hedgerow planting and reinforcement of existing hedgerows within the site. An access plan is provided below: [see attached]</p> <p>The planning application is accompanied by a suite of technical reports that confirm that any potential adverse impacts can be successfully mitigated.</p> <p>The whole of the site is within Flood Zone 1 and surface water discharge rates will be managed via SuDS so that there is no increased risk of Flooding from this development.</p> <p>A number of trees on site are subject to a TPO, which appropriate buffers have been allowed around these trees to save any impact on them. Ecology surveys were conducted across the site, which found that the majority of the site is improved grassland and is of low ecological and nature conservation interest. Low numbers of bat species were noted using field boundaries as foraging and commuter corridors and a buffer has been created along Lambrok Stream.</p> <p>The site is not adjacent to any Conservation areas. The grade 2 listed Baptistry on the south site of Wynsome Street is not adversely affected by the development of the site.</p> <p>A proposed development framework for the site can be seen below, which illustrates how the scheme can be integrated into the existing built form of Southwick: [see attached].</p> <p>Summary of Opportunities Provision of high quality sustainable housing, with the site able to accommodate up to 140 new homes and associated green space.</p>				

	<p>The creation of a development that is well-related to the existing settlement of Southwick. As a consequence, it is considered that the north eastern extent of the new residential development area should broadly follow the existing settlement edge to the north west of the Site, with the areas of the Site beyond being left undeveloped as a potential new country park.</p> <p>Retention of the vast majority of the existing hedgerows and trees located within the site to maintain their ecological value</p> <p>Safe and acceptable vehicular access from Wynsome Street.</p> <p>Provision of new recreation routes within the site with connections to the existing public right of way network and Wynsome Street.</p> <p>The provision of new Sustainable Drainage System (SuDS) features which would form an integral part of the development's green infrastructure and be designed to maximise landscape and biodiversity benefits.</p>
<p>Attached files (Please see Objective)</p>	<p>4734586</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To update date the Inspector on the progress of the proposed allocation sites and to adequately present the benefits of sites in general.</p>

Comment ID:	2714	Consultee Mr John Fleming Gladman Developments	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - Land at Westbury Road, Great Cheverell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Gladman seek the allocation of land at Westbury Road, Great Cheverell for residential development. The site measures a little under 1 hectare and lies to the east of Great Cheverell. The site is considered suitable, available and achievable and its development and a main access can be achieved off Westbury Road. The proposal would create:</p> <p>Residential development for up to 15 dwellings for self-builders.</p> <p>Green Infrastructure (GI) including new areas of green space, ecological mitigation and habitat creation, retained hedges and trees, sustainable drainage features, play and recreation space.</p> <p>The site is bounded to the north and west by the village of Great Cheverell and open fields to the south and east. A site location plan is provided below: [see attached]</p> <p>There are public footpaths and bridleways within the wider context of the Site, which form an interlinked network of Public Rights of Way. A Public Footpath crosses the Site along part of its northern boundary which leads from Hillside and joins the wider footpath network to the east of the site.</p> <p>Access is taken off directly off Westbury Road by way of a simple priority junction. The length of hedgerow that is being removed to facilitate access will be mitigate by substantial new hedgerow planting and reinforcement of existing hedgerows within the site.</p> <p>The site is relatively well contained by existing vegetation and built form.</p> <p>The whole of the site is within Flood Zone 1 and surface water discharge rates will be managed via SuDS so that there is no increased risk of Flooding from this development.</p> <p>Ecology surveys were conducted across the site, which found that the site is improved grassland and is of low ecological and nature conservation interest.</p> <p>The site is close to the Conservation areas but it lies beyond rear gardens of properties and is beyond its visual setting.</p> <p>Summary of Opportunities</p> <p>Provision of high quality sustainable housing, with the site able to accommodate up to 15 new homes for self-build and associated green space.</p> <p>Opportunity to create a development that is well-related to the existing settlement edge of Great Cheverell.</p> <p>Existing landscape features will be protected and enhanced wherever possible in order to improve green networks and habitat opportunities.</p> <p>Additional ecological habitats would be introduced as part of the green infrastructure to encourage strong wildlife corridors through the development and enhance the sites biodiversity.</p> <p>Opportunity to provide vehicular access to the new development from Westbury Road which runs directly along its western boundary.</p> <p>Provision of new attractive footpaths and cycleways within the site with connections to the existing public right of way network.</p> <p>To provide new Sustainable Drainage System (SuDS) features which will form an integral part of the developments green infrastructure and be designed to maximise landscapes and biodiversity benefits.</p>			

Attached files (Please see Objective)	4734586
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To update date the Inspector on the progress of the proposed allocation sites and to adequately present the benefits of sites in general.

Comment ID:	2715	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Sustainability appraisal			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The sustainability appraisal does not include the consideration of all reasonable alternatives in identifying the most appropriate sites for allocation. Evidence: Pre-submission Draft Plan and Sustainability Appraisal				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2716	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Insufficient land is identified through the proposed allocations for East Wiltshire to ensure that the minimum local plan requirement will be achieved whilst maintaining a five year housing land supply. Evidence: Council Topic and Paper 4 NPPF				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2717	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Insufficient land is identified through the proposed allocations for North and West Wiltshire to ensure that the minimum local plan requirement will be achieved whilst maintaining a five year housing land supply. Evidence: Council Topic Paper 4 NPPF				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2718	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Insufficient land is identified through the proposed allocations for South Wiltshire to ensure that the minimum local plan requirement will be achieved whilst maintaining a five year housing land supply. Evidence: Council Topic Paper 4 and NPPF				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2719	Consultee Mr John Fleming Gladman Developments	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 977912		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Section 7 - Implementation and Monitoring		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		A clear monitoring and review mechanism is required to ensure that development needs are met in full over the plan period. Evidence: Core Strategy and Pre-submission Draft Plan			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2720	Consultee Mr Richard Ayre Land and Planning Director	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Baker Estates Person ID: 1134745		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Baker Estates consider the following to be apparent: There is too great a reliance on the "commitments" delivering the housing numbers required to meet the housing identified in the core strategy. Allocating more sites in the slower market areas and towns and on larger sites increases the risk of not keeping up with the trajectory. This is shown in previous completion figures. A town which has demonstrably shown that it can deliver large numbers of houses in Melksham. It makes sense to allocate further land where it will turn into actual houses. The attached site is in a very sustainable location that could also facilitate the delivery of new education infrastructure that is needed in the town. A shortfall in infrastructure has been identified. It should be the role of each development plan document to do more than just seek to meet numbers. Positive planning should identify "contributing" sites even if that potentially means a risk of exceeding numbers set out in the Core Strategy. The attached site also offers the prospect of reserving a corridor for the aspirational canal corridor with landowner support rather than (as currently) with objection. The plan as it relates to Melksham is not positively planned in terms of actually providing homes where there is demonstrated demand, meeting identified infrastructure deficiencies and reducing risk of underdelivery across the housing market area. The attached site should be allocated for residential development plus associated infrastructure which could include potentially a school site and a canal corridor reservation.</p>				
Attached files (Please see Objective)	4734884 / 4734883				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It will be useful to discuss the matters identified particularly the realism of allocating more sites to other towns (notwithstanding the core strategy) and the benefits of allocating a larger site at Melksham.				

Comment ID:	2721	Consultee Mr E J Hillier	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445981		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council's proposed new housing development on the Netherhampton Road I am sorry to have to contact you by letter but I do not use emails and I would like to pass on my views on the proposed new development on Netherhampton Road.</p> <p>I have lived in Salisbury for 57 years and more specifically in Harnham for 36 years. I have seen many changes over this time however I feel that the proposed new development on the Netherhampton Road is a step too far and I object to this due to the traffic congestion it will create along this road and surrounding areas.</p> <p>The A3094 is used as a ring road for the South, East and West bound traffic and merges with the A36 Southampton Road, A338 Ringwood Road and A354 Blandford Road on a roundabout at the eastern end of the road. The western end of the road meets the A36 Bristol Road at a T junction.</p> <p>No matter what road improvements or alterations are made between these points it will make no difference as you still have to negotiate either of these two intersections to leave the Harnham area. Also, the extra volume of traffic will have great effect on the existing side streets as there is no alternative way out of the current estates.</p> <p>The Netherhampton Road is not only used by residential vehicles. The Southampton to Bristol route joins two major shipping ports and is therefore heavily used by large vehicles and container lorries. Therefore any further residential cars, caused by the housing development, will put further strain on this overly used route.</p> <p>Should this project be given the green light more traffic will use the A36 Wilton Road Churchill way route putting more congestion on these areas also.</p> <p>Please could you pass my comments and objection to the necessary department on my behalf.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2722	Consultee Mr David Horler Landowners of site at Warminster Road, Westbury	Agent Mrs Joanna Lee Associate	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134217	Peter Brett Associates Person ID: 1005672	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Please see attached report which sets out our objections on behalf of the Landowners of the site at Warminster Road, Westbury.</p> <p>The Plan is currently unsound because it does not provide enough housing for a long enough timescale which is contrary to national policy and means it is not positively prepared.</p> <p>The Site Selection Process and Methodology is fundamentally flawed and fails to adequately consider all the available suitable and deliverable sites and in additional does not appear to have been informed by the up to date SHLAA, as such it is not justified.</p> <p>The lack of amendment to the settlement boundaries and the proper identification of site in Westbury means that the Plan fails the tests of soundness because is not positively prepared or consistent with national policy.</p> <p>Please see report (attached)</p> <p>The Plan can be made sound by covering a longer time period, allocating sites to meet the full local housing need as demonstrated by the emerging SHMA and should specifically include the site at Warminster Road Westbury as an allocated site under Policy H2 for housing development.</p>				
Attached files (Please see Objective)	4734409				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We wish to attend the hearing sessions in order to more effectively represent our interest and also provide an update to the Inspector, which is best done through discussion.				

Comment ID:	2723	Consultee Mr E J Hillier	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445981	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, I cannot understand the logic of putting the development on land that is very often under water. I have witnessed the fields being covered with water and taking weeks to drain away. This is with soil drainage so I question how long it will take to absorb the floods when you cover the land with concrete footings and buildings. If the intention is to create flood defences I question where it is being proposed to divert the water to, as Harnham is already susceptible to flooding.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2724	Consultee Mr E J Hillier	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445981		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council's proposed new housing development on the Netherhampton Road I am sorry to have to contact you by letter but I do not use emails and I would like to pass on my views on the proposed new development on Netherhampton Road.</p> <p>I have lived in Salisbury for 57 years and more specifically in Harnham for 36 years. I have seen many changes over this time however I feel that the proposed new development on the Netherhampton Road is a step too far and I object to this due to the traffic congestion it will create along this road and surrounding areas.</p> <p>The A3094 is used as a ring road for the South, East and West bound traffic and merges with the A36 Southampton Road, A338 Ringwood Road and A354 Blandford Road on a roundabout at the eastern end of the road. The western end of the road meets the A36 Bristol Road at a T junction.</p> <p>No matter what road improvements or alterations are made between these points it will make no difference as you still have to negotiate either of these two intersections to leave the Harnham area. Also, the extra volume of traffic will have great effect on the existing side streets as there is no alternative way out of the current estates.</p> <p>The Netherhampton Road is not only used by residential vehicles. The Southampton to Bristol route joins two major shipping ports and is therefore heavily used by large vehicles and container lorries. Therefore any further residential cars, caused by the housing development, will put further strain on this overly used route.</p> <p>Should this project be given the green light more traffic will use the A36 Wilton Road Churchill way route putting more congestion on these areas also.</p> <p>Please could you pass my comments and objection to the necessary department on my behalf.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2725	Consultee Mr E J Hillier	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 445981	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In addition, I cannot understand the logic of putting the development on land that is very often under water. I have witnessed the fields being covered with water and taking weeks to drain away. This is with soil drainage so I question how long it will take to absorb the floods when you cover the land with concrete footings and buildings. If the intention is to create flood defences I question where it is being proposed to divert the water to, as Harnham is already susceptible to flooding.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2726	Consultee Greatworth Developments Ltd	Agent Mr Diccon Carpendale Brimble Lea and Partners	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 404224	Person ID: 1122261	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		SHLAA site 239		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This objection relates to Wiltshire Council deciding not to include land east of Damask Way, Warminster (SHLAA site 239) within the draft Wiltshire housing site allocations plan.</p> <p>Within the north and west Wiltshire housing market area the plan states an indicative requirement (2006-2026) for 1920 dwellings for Warminster. It identifies a shortfall of 212 dwellings (14%).</p> <p>The draft plan has failed to identify SHLAA site 239 for inclusion and as such objection is made to paragraphs 5.85 – 5.101 and the settlement boundary review methodology (topic paper 1) which has resulted in the exclusion of this site from further consideration based on erroneous assumptions.</p> <p>The methodology apportions weight to the informal consultation with Town and Parish Councils exercise undertaken in 2014 and feedback received from it. Objection was raised at the time with the LPA to the failure to involve landowners or their agents and, as such, it is not considered that this part of the process was undertaken in an appropriate fashion allowing all relevant parties to be involved in the assessment process.</p> <p>Topic paper 2 – Site selection process methodology – contains a flow chart confirming that selection focuses on community areas where land supply needs to be supplemented but immediately excludes SHLAA sites which are affected by barriers to development i.e. much is made of the veracity of the initial SHLAA assessment and if (as is the case with this land) there are errors within this process, the exclusion of the site on this basis is clearly unreasonable and flawed.</p> <p>The Wiltshire housing site allocations DPD/pre-submission consultation includes a series of community area topic papers along with one specifically for the Warminster community area WHSAPCONS32. Within this the SHLAA site 239 (land on Upper Marsh Road) with an identified site capacity to deliver 78 dwellings has been assessed against a series of criteria. Under strategic (exclusionary) criteria it is identified as in part being contrary to criterion 1 and it is stated that this is because the site is partly permitted. This relates to only a small area of the land (5 dwellings).</p> <p>Similarly under criterion 2 the site has been excluded as it is considered to be “partially” within the settlement boundary. In actual fact all of the site sits within the town policy boundary as defined within the West Wiltshire Local Plan and carried forward into the Wiltshire Core Strategy.</p> <p>The main reason for the exclusion of the site appears to be on the assessment as to whether the land is developable. The reason it is identified as not being developable is that there is insufficient access to the site. This is incorrect. There is currently a pre-application enquiry lodged with Wiltshire Council with respect to the further (limited) development of the land in question and the access arrangements to the site have been discussed with the Highway Authority. Whilst various issues have been raised by the Highway Authority, ongoing work is being undertaken and it is understood (based on discussions between Highways Consultants and Wiltshire Council) that those areas that need to be addressed have been agreed and are considered capable of being resolved. It is therefore incorrect to assume that the land cannot be developed for this reason.</p> <p>The site is assessed positively in relation to the strategic (exclusionary) criteria 3-6 (inclusive) and is also confirmed as being available.</p>				

	<p>It is not stated within the (very brief) assessment of the site that it is considered to be isolated from the urban edge or to have adverse visual impact. However, further landscape and visual impact assessment (LVIA) work is being undertaken in relation to the pre-application submission to demonstrate that there is no adverse visual harm associated with part of the site being developed. It is recognised that additional strategic landscaping will be required and that not all of the site will necessarily be appropriate for further development. However, it is assessed that approximately 30 additional dwellings can be accommodated on the site with an acceptable visual impact served by a suitable and safe access onto Upper Marsh Road.</p> <p>On this basis site 239 has unreasonably been excluded (without justification) at an early stage of the process. Had it been carried forward for further consideration as it is clear that it should have been, there would have been no justifiable reason for excluding the site from allocation. On this basis, objection is raised to the process. This objection can be addressed through proper reconsideration of the site, the access arrangements to it and further consideration of visual impact – additional information is being provided on both of these grounds (in association with the pre-application enquiry) which should be taken into account by relevant departments at Wiltshire Council during reconsideration of the site.</p> <p>The land East of Damask Way, Warminster (SHLAA site 239) should be allocated for development and the Town Policy boundary left unchanged as the decision to exclude the site is based on erroneous assumptions about accessibility and landscape impact.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To explain why the site should be allocated for development and the Town Policy boundary remain unchanged.</p>

Comment ID:	2727	Consultee Mrs A L Mouland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448417		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With reference to the proposed 740 houses on Netherhampton Road, I am against this, unfortunately I was unable to go to the Exhibition in the Guildhall last week.</p> <p>I have lived here for nearly 60 years and in that time the traffic has built up considerably at times the traffic going in to town has been queued up to our road.</p> <p>I see in last weeks Journal that there is another planning application for a further development at Netherhampton Farm.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2728	Consultee Mrs A L Mouland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 448417		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed 100 houses (S1027) at Waldens Farm this land in the winter is very often flooded.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2729	Consultee C/O Agent	Agent Mr Nick Mathews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
		Person ID: 645345	Person ID: 389644		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Hallam Land Management control an area of land approximately 11.05 hectares in size adjacent to the eastern edge of Warminster, a proportion of which is allocated within the Draft Plan under Policy H2.7 (East of the Dene, Warminster) for residential development. In addition, an outline planning application was submitted in October 2016 (ref: 16/10502/OUT) for the development of the site for up to 135 residential dwellings. This application is currently pending a decision. A significant amount of technical work has been prepared to support the application proposals, all of which concludes that there are no technical or environmental matters which would preclude development and that appropriate design and mitigation measures can be readily implemented to create an attractive high-quality development. It is therefore considered that the development of the site would be technically sound and is entirely deliverable and achievable. Whilst the enclosed representations include copies of a number of consultation responses from officers at Wiltshire Council confirming the application is technically sound, copies of all the consultation responses to the application can be found via the Council's online planning portal using the application reference number 16/10502/OUT.</p> <p>Whilst we welcome the Council's recognition of the site's suitability and sustainability, given the potential significant implications for the site as a result of the current wording of Policy H2.7, we have endeavoured to meet with your planning policy officers prior to the consultation deadline on 22 September 2017, but have been unable to secure a meeting date. However, now that formal representations have been provided, it is important we are able to meet with the planning policy team prior to the current extension of time on the planning application which runs until 13 October 2017. Our main concern is that the Site Allocations DPD evidence base is not as substantial and rigorously tested as that associated with the planning application information, thus it seems eminently appropriate to have full regard to the most up-to-date information. Having said that, there is clear opportunity for the Council and applicants to work together to achieve the most suitable scheme, now that the location in principle has been deemed acceptable by the Council.</p> <p>In this respect, we would like to set up a meeting during the week commencing 9 October 2017 and will be in touch with the planning policy team to arrange this.</p> <p>[Representation setting out that the proposed allocation of site H2.7 is welcomed, but that a number of amendments to the proposed allocation are sought having regard to the evidence set out in support of current planning application 16/10502/OUT.]</p> <p>See enclosed representations</p>				
Attached files (Please see Objective)	4734433 / 4734431				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.				

Comment ID:	2730	Consultee Mr Paul Gardner Director	Agent Mr Alan Pearce Partner	Do you consider the draft WHSAP is legally compliant?	Yes
		Absolute Solvents Ltd Person ID: 1134308	Alder King Planning Consultants Person ID: 1134306	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraph 2.8, 2.9		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The settlement boundary drawn up excludes land granted planning permission and also allocations which is not considered to be positively prepared or justified as it will immediately become out of date when these schemes come forward. The site's allocated or permitted are a commitment to supporting development and as a result they should be shown within the settlement boundary to encourage positive planning and provide the necessary presumption in favour of development stance. Paragraph 2.8 reconfirms this approach - "development within the settlement boundary is, in principle, acceptable, whereas development outside the settlement boundary is, with limited exceptions, not acceptable."</p> <p>Therefore allocated or permitted sites outside the settlement boundary start from a negative position when judged in the development process. Reference at para 2.9 to para 4.25 of WCS does not include allocated sites or those sites with permission. It is appreciated that the draft version did include these and was then changed to exclude them however it does not seem logical to exclude land highlighted for development. The settlement boundary should reflect allocated and permitted sites. Wording of para 2.9 should be reconsidered.</p> <p>It is understood that these may not come forward immediately but where they form part of a supply of housing or employment which the Council are depending on during the lifetime of the Plan then they should be included to demonstrate commitment that development in that area is supported.</p>				
Attached files (Please see Objective)	4734480 / 4734479				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2731	Consultee Mr Paul Gardner Director	Agent Mr Alan Pearce Partner	Do you consider the draft WHSAP is legally compliant?	Yes
		Absolute Solvents Ltd Person ID: 1134308	Alder King Planning Consultants Person ID: 1134306	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraph 4.9		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	At para 4.9, it is stated that land not included in the SHLAA has not been included in the Council's assessment of suitable sites. This is not considered to be the most positive way of shaping settlements and delivering housing and does not allow strategic thought about what land is most desirable to development for each use. Whilst it is understood that there are limited resources available to research land ownership on land not put forward in the SHLAA, the Council could have reviewed land and allocated based on the most sustainable location and form of development and through the plan process consulted with land owners to identify a preferred strategy rather than restrict the strategy to only land put forward via the SHLAA to date. Paragraph 4.9 does state that other land may be capable of development but that the Council cannot count on that land to deliver and therefore be effective. However, the Council could have allocated other land or considered it to promote a preferred strategy. For example, our clients previously developed land within the settlement boundary could have been earmarked as suitable to create a sustainable form of development despite it not coming forward via the SHLAA.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2732	Consultee Mr Paul Gardner Director	Agent Mr Alan Pearce Partner	Do you consider the draft WHSAP is legally compliant?	Yes
		Absolute Solvents Ltd	Alder King Planning Consultants	Do you consider the draft WHSAP is sound?	No
Person ID: 1134308			Person ID: 1134306		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2 & H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2 defines residential allocations made based on the SHLAA sites and does not consider potential alternative sites within Westbury itself before Bratton. Whilst Bratton is not considered to be an unacceptable location for development, land exists within the proposed settlement boundary which is better located and sequentially preferable but this is not included. The Bratton site is within a Special Landscape Area My client has land available for development for residential purposes which would have employment opportunities within walking distance and which should be included to provide a mix of land uses in this location. Residential uses are immediately adjacent to the site and therefore the land could come forward to help deliver the ever-increasing housing land supply figures. This would be consistent with current national policy and would not prejudice the delivery of employment land due to the significant available provision at Hawkeridge.</p> <p>The inclusion of our client's land in the allocation under Policy H2 for residential purposes or mixed use development contributing to meeting the housing need and providing a more balanced mix of uses consistent with national policies. The site has been submitted to the Council for consideration and given the overall increase in housing requirement and underperformance of delivery at Trowbridge, additional land in Westbury could be beneficial to maintaining a 5 year supply.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2733	Consultee Mr Paul Gardner Director	Agent Mr Alan Pearce Partner	Do you consider the draft WHSAP is legally compliant?	Yes
		Absolute Solvents Ltd Person ID: 1134308	Alder King Planning Consultants Person ID: 1134306	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Section 6 of WHSA and Topic Paper 1				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Westbury settlement boundary has long been inappropriate due to the exclusion of a huge amount of built development to the north of the avoiding railway line. The proposed settlement boundary now at least reflects the extent of development in which there would be a presumption in favour of sustainable development. We therefore support the change to the boundary to include these areas and consider that perhaps it could go further and include other committed land in the form of allocations / permissions which form part of the supply in the plan to provide a realistic picture of the built form during the plan period.</p> <p>The settlement boundary should include the areas now defined at Brook Lane and elsewhere in Westbury to reflect the extent of built development in the town as a whole and within these areas development should be supported in principle as defined in Core Strategy policies.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2734	Consultee Mr Paul Gardner Director	Agent Mr Alan Pearce Partner	Do you consider the draft WHSAP is legally compliant?	Yes
		Absolute Solvents Ltd	Alder King Planning Consultants	Do you consider the draft WHSAP is sound?	No
Person ID: 1134308			Person ID: 1134306		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Para – 4.47 and 4.57				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraphs 4.45 to 4.57 provide commentary on the growth rates and delivery of housing across the plan area and make specific comments on Westbury delivering at a better rate than Trowbridge. Without assessing the reasons why, it can be seen that Trowbridge has delivered 43.5% of its requirement in the first part of the plan period and is earmarked to under deliver by 18%. Westbury however has provided 58.5% of its requirement and is set to deliver 21% over the initial requirement. This could be reflecting demand in part and as a result, to help ensure delivery of the overall housing requirement there could be justification for further allocations in Westbury to meet the demand and help achieve the housing requirement across Wiltshire i.e. include flexibility in delivery location in order to achieve overall targets rather than restrict further growth at Westbury (as the Core Strategy seems to indicate at 4.57). Further consideration on the overall strategy should be given reflecting upon delivery across the plan period so far to appreciate whether it is correct to restrict housing growth in Westbury. Westbury has excellent communication links with the railway station connections and employment land with further employment allocations and as such is a good location for further growth with the planned new infrastructure improvements resulting from the Station Road development. Allocation of land in my client's ownership could assist in meeting the overall housing land target and would represent sustainable development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2735	Consultee Mr Philip Atyeo Person ID: 1134352	Agent Mark Reynolds Person ID: 1124938	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site			Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Land at Brick Hill, Bath Road, Warminster				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>6 THE ABILITY OF OTHER SITES TO DELIVER THE NECESSARY DEVELOPMENT WITHIN WARMINSTER</p> <p>6.1 The WHLAS takes forward three separate sites in Warminster for allocation for further residential development. The sites in question are considered below;</p> <p>Boreham Road – approximately 30 dwellings</p> <p>6.2 This site was refused planning permission but allowed on appeal by the Secretary of State (SoS) (Appendix 1). The SoS gave limited weight to the emerging WHLAS in reaching this decision he also concluded that there was evidence of a 5 year land supply (in July 2017) and noted that ‘the site is outside of the development limits for Warminster and the appeal scheme is not in accordance with policy CP2 of the Development Plan, and therefore is not in accordance with the Development Plan overall...The Secretary of State considers that the proposal would provide a number of housing benefits, including contributing to boosting the supply of housing; providing 30% affordable housing as required by Core Policy 43; providing much needed custom build homes; and bringing economic benefits during and after the construction phase...overall, given the significant benefits of the proposal set out above and the absence of any unacceptable harm, the Secretary of State concludes that material considerations indicate that the appeal should be allowed’.</p> <p>6.3 The decision letter likewise made clear that in respect of housing delivery ‘in line with paragraph 47 of the Framework, which requires local authorities to boost significantly the supply of housing, he takes the view that the five year requirement is a minimum and not a cap’.</p> <p>6.4 This decision confirms the acceptability of the site but it does also confirm that at a time when the housing need was considered to be being met in terms of a 5 year land supply that if a site is acceptable in other respects it should still be able to come forward for development even if it is outside of the settlement boundary because there is a clear need to boost housing land supply in the WMCA. The situation in terms of housing land supply is worse now than when the SoS considered the appeal (following the outcome of the Gleeson appeal in August) which lends further support to additional housing.</p> <p>Borehill Farm – approximately 70 dwellings</p> <p>6.5 This site is subject to an extant planning permission for industrial use and is located in close proximity to a bio-digester both of which are likely to give rise to noise and air quality complaints. These factors indicate that the site is likely to offer future residents a poor level of amenity which whilst the allocation suggests this can be mitigated it is unclear on what basis this conclusion has been reached.</p> <p>6.6 The site is relatively removed from the centre of Warminster and it is acknowledged in the WMCA Topic Paper June 2017 that ‘the site is more than 1km from the town centre and is therefore not considered to be within good walking distances of services and facilities at town...residents at likely to use private vehicles’.</p>				

6.7 My Client's land is in a more sustainable location having regard to the significant level of facilities within walking distance and the WWUE which will significantly increase these and provide a 30min frequency bus service. My Client's land is preferable therefore and the WHSAP is not justified as it is not the most appropriate strategy.

Land East of the Dene – approximately 100 dwellings

6.8 WMCA Topic Paper outlines a number of constraints for this site. The site is acknowledged to be an important gap between Warminster and Bishopstrow House (grade II listed). The south of the site also provides a setting for a number of listed buildings. The eastern boundary of the site also adjoins the Bishopstrow conservation area. Development of the site would necessitate removal of a stretch of natural stone wall which is a non-designated heritage asset and a significant contributor to the character and appearance of the area.

6.9 A planning application has been lodged 16/10502/OUT which seeks outline permission to develop the site. The application is pending consideration at present but has been stalled since it was submitted in November 2016 with the Council seeking withdrawal of the application.

6.10 There are several areas of in principle objection to the proposals and these are in respect of the impact on designated and undesignated heritage assets and the landscape impact of the proposal. The Council's Conservation Officer considers that the development of the site would result in 'significant harm' which would be at the upper end of 'less than substantial harm' for the purposes of the NPPF. The Council considers that harm will be caused to the setting of Bishopstrow house and several other grade II listed buildings. The setting of the neighbouring Battlesbury Hill which is a Scheduled Ancient Monument will likewise be harmed. The wall which would need to be removed to facilitate access into the site has been considered to be an undesignated heritage asset and the loss of the wall has likewise been objected to.

6.11 The Council's Landscape Officer likewise objects to the development of the site noting that only a small amount of development could be appropriate. It was concluded in the CS evidence base document 'Wiltshire Council Strategic Site Options – Landscape Assessment; Appraisal of Strategic Site Options, capacity to accommodate landscape and visual change, Autumn 2011' that 'this green space gives a strong visual setting to the edge of Warminster with views to the Wylve and the chalk download. Small parts of the site could cope with minor changes if there was substantial mitigation. However to develop the entire site would dramatically alter the character of this approach to Warminster and obstruct views to the chalk land. There are other options proposed for the town that would be more appropriate for a strategic site before this is considered'.

6.12 There are significant questions about the deliverability of this proposed allocation. Given the areas of identified harm to designated and undesignated heritage assets and the landscape setting of the edge of Warminster it is argued that this site should not be allocated for development. My Client's site could obviate the need for harm to be caused by developing Land east of the Dene. The NPPF (paragraph 126) outlines the requirement, in respect of plan making, that 'LPAs should take into account the desirability of sustaining and enhancing the significance of heritage assets'. Paragraph 159 advises that Local Plans should 'contain a clear strategy for enhancing the natural, built and historic environment'. The allocation of the land east of the Dene is not consistent with these requirements of the NPPF and is therefore not consistent with national policy.

6.13 My Client's position is that inadequate housing is being planned for in Warminster to meet the objectively assessed need. In this respect further site allocations should take place. The existing allocation at Land East of the Dene appears contrary to planning policy and therefore it should also be removed from the identified supply. The Council's strategy for allocations does not represent the most appropriate strategy and is therefore not justified.

7 AMENDMENTS SOUGHT TO THE WHSAP

7.1 My Client's land outlined in (Fig 3 and Appendix 2) is available, deliverable and should be a preferred option for development under the WHSAP. Allocation of the site in full for residential development is therefore sought as an amendment to the WHSAP. A suggested density of 40 dwellings per hectare over the developable part of the site is suggested which provides an indicative figure of around 110 dwellings

THE RELEVANT POLICY TO WHICH THIS REPRESENTATION RELATES

1.1 This objection centres on the following parts of the document;

Section 4. Housing delivery strategy – How many homes are needed and where, How were sites selected, 2A: Exclusionary criteria; Summary of site allocations; Objective 3: Spatial Strategy North and West Housing Market area;

Section 5. Housing site allocations – Warminster H2.7, H.2.8; Warminster Community Area Topic Paper June 2017; 4. Overview of the site selection process; 5. Outcome of the site selection process for Warminster; the Appendices to the Topic Paper.

1.2 The submission also references some of the other Topic Papers which underpin the Pre-submission Draft Wiltshire Housing Sites Allocation Plan (WHSAP). This representation is structured to firstly consider the rationale underpinning the requirement for the site allocation process before considering the housing supply position within the North West Housing Market Area (NW HMA) and the Warminster Community Area (WMCA). It goes on then to consider my Client's land at Warminster and the case for its inclusion as a site allocation before looking at alternative sites and drawing overall conclusions.

2 EVOLUTION OF THE REQUIREMENT FOR SITE ALLOCATIONS

2.1 The Wiltshire Core Strategy, Inspector's Report December 2014 noted (at paragraph 378) in relation to the Warminster Community Area (WMCA) that the level of housing being proposed at 2,060 homes 1,920 of which to be provided within Warminster having 'due regard to the updated evidence base, including the SA, the SHMA and the Council's topic papers such an approach is justified adequately and I recommend accordingly'. He noted at (paragraph 379) that 'subsequent details of housing distribution can reasonably emerge through the Sites DPD'.

2.2 At (paragraph 380) he concluded that the West Warminster Urban Extension (WWUE) 'offers a suitable opportunity to secure a coherent and sustainable urban extension to the town. It is supported, particularly by the IDP, by an adequate consideration of infrastructure requirements, including education, health, emergency services and transportation'.

2.3 Wiltshire Core Strategy (CS) (paragraph 4.26d) guided that 'the Council is also preparing a Housing Site Allocation DPD in order to ensure a sufficient choice and supply of suitable sites over the period up to 2026'. The supporting text to CS Policy CP2 likewise notes that outside of existing settlements 'the limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Developments Plan Documents...and neighbourhood plans'. It is accepted within the CS that it is vitally important that the WHSAP should cater for the residual unmet housing need in the WMCA. Indeed this is precisely the rationale for producing the WHSAP.

3 HOUSING SUPPLY IN THE NORTH AND WEST HOUSING MARKET AREA

3.1 The Council on the 17th August 2017 received the Inspector's decision in respect of an appeal against a refusal of residential development of up to 60 dwellings near Lyneham by Gleeson Developments Limited (Appendix 1). The Inspector in reaching his decision considered the latest position in terms of the Council's ability to demonstrate a 5 year land supply in the North and West Housing Market Area (NW HMA). The Inspector concluded in the period 2016-2021 the minimum target is 6,817 dwellings (which includes a 5% buffer) and that the Council's supply would be 6,891 as opposed to the 7,033 which was alleged by the Council. The agreed supply figure for housing only marginally therefore exceeds the required level of housing by a projected 74 dwellings over the next 5 years.

3.2 This calculation presumes also that the Council will continue to be required to demonstrate only a 5% buffer above the 5 year housing target. The Inspector in this appeal concluded that a 5% buffer was appropriate despite an earlier Inspector ruling in a Malmesbury appeal that persistent under-delivery had taken place, and therefore a 20% buffer should be required. The Inspector did however sound a cautionary note in concluding 'overall whilst I acknowledge performance is not strong in housing delivery and there are worrying signs that the Council need to address, particularly in the more recent years since adoption of the WCS where delivery has not met requirements, I do not conclude that under delivery at this point has been persistent in the context of the framework'.

3.3 The Government White Paper 'fixing the broken housing market' published a consultation response to a proposed Housing Delivery Test. This proposes an assessment of delivery against the housing requirement in the past 3 monitoring years, beginning in November 2017. In cases where delivery over this time period falls behind then a 20% buffer may be required. This measure is likely to increase the risk of Wiltshire Council having to apply a 20% buffer which would immediately in the NW HMA result in a lack of a five year land supply.

3.4 The review of the need for site allocations and of the settlement boundaries which underpin the WHSAP was predicated on a very different understanding of the housing trajectory coming forward over the 5 year period 2016-21. Hitherto the Council identified a supply of 7,446 dwellings against a target of 6,817 dwellings. The Inspector in the Lyneham appeal referred to above concluded that the supply was actually 6,891 dwellings against a target of 6,817.

3.5 Delivery rates have failed to meet the Council's expectations and in the months since the publication of the Interim Housing Land Supply Statement (March 2017) 555 dwellings have fallen away from the projected deliverable 5 year land supply. The published WHSAP has clearly been superseded by events and the appeal conclusions clearly indicate there is a need to increase supply within the NW HMA to avoid the risk of a lack of 5 year housing land supply occurring. The plan is un- sound in this regard because it is not positively prepared and it is not justified because it needs to be reviewed in terms of the material change in circumstances which the Lyneham appeal has yielded.

3.6 The WHSAP recognises the uncertainties inherent in housing delivery. Paragraph 2.3 of Topic Paper 4: Developing Plan Proposals advises that Wiltshire Council's (WC) strategy is 'to be sure of maintaining a five year housing land supply over each of the remaining years of the plan period, annual supply should exceed the five years and buffer required by planning policy. Any target level will be arbitrary but the Plan might look to provide at least six years of supply in each of the remaining years of the Plan period (to allow for any possibility of under- delivery in the future)'.

3.7 The 5 year housing land supply trajectory as published in the NW HMA purports to demonstrate that this is achievable in the HMA. This assessment is however based upon the now out of date projected deliverable supply. Whilst a delay in supply might bolster housing delivery at the end of the plan period, this becomes more uncertain when looking towards the end of the plan period. It is however more likely that housing required to 2026 will slip outside of the plan period thereby resulting in a shortfall.

3.8 Based upon the Inspector's conclusions on housing land supply in the Lyneham appeal it is clear that WC will be unable to demonstrate a 6 year supply over the forthcoming 5 years (2017-22). The WHSAP therefore needs to be fundamentally looked at in respect of the NW HMA in order to boost supply if it is going to achieve its own stated goal of at least a 6 year supply being projected in each of the remaining Core Strategy years to 2026. Given the required step change in delivery rates and the recent under-delivery of housing it is argued that a 6 year supply is an entirely reasonable and necessary target.

4 HOUSING SUPPLY IN WARMINSTER AND ITS ASSOCIATED COMMUNITY AREA

4.1 The position is significantly worsened when looking at the housing position for Warminster and its associated community area. Evidence base Topic Paper 3 to the WHSAP table 2.2 reproduced below evidences the position (Table 1);

Table 1 – Housing requirements

[See attached Appendix 1]

4.2 The Council's evidence shows a residual requirement of 494 dwellings. This represents nearly 25% of the required supply needing to be found through the WHSAP by a combination of settlement boundary review and site allocations. Against this challenging housing target it is important to also recognise that at present only 693 completions have taken place in the first 11 years of the plan period averaging 63 completions per annum leaving 1,367 completions required over the last 9 years of the plan period at a delivery rate of 151 dwellings per annum. This requires a step change in housing delivery in the area and any further delays in bringing the WWUE forward to be delivering housing from 2018 will make the situation much worse. This lack of contingency and reliance on one large site puts the already inadequate levels of housing being projected at risk of slippage.

4.3 The WHSAP attempts to deal with the housing shortfall and proposes allocations within Warminster totalling 200 dwellings and a further allocation in Chapmanslade of 35 dwellings. Even if one presumes that these allocations are deliverable (which is questioned later) the strategy is not planning for enough housing to meet the objectively assessed need (OAN). The settlement boundary review has followed a process designed to regularise existing areas of development which sit outside the boundary rather than to seek to support additional windfall developments at Warminster and the large villages.

4.4 The WHSAP recognises as did the CS that area based targets for housing need not be overly prescriptive indeed they should not be recognised as maximum levels of appropriate development. There are some instances of settlements and community areas which WC consider will not be capable of delivering their required levels of development. Core Policy 31 of the CS (paragraph 5.158) outlines the specific issues related to the WMCA but at paragraph 2.6 of the WMCA Topic Paper it is noted that 'neither the WCS or the IDP identify insurmountable issues to the extent that they would restrict delivery of the level of housing proposed over the plan period'. There is then no reason articulated by WC to explain development not meeting the target outlined in the WMCA. Whilst there will be an element of windfall development within the WMCA this alone will be insufficient to meet the residual requirement of 259 dwellings.

4.5 As outlined above at 3.6 the stated approach of the Council is to seek to deliver a 6 year supply of housing for each of the remaining years of the plan period. In the case of the WMCA this level of housing has not been planned for. Indeed it seems highly unlikely given the existing shortfalls within the WMCA that the required levels of housing are achievable. The plan is not in this regard sound because it has not been positively prepared and is failing to meet the objectively assessed need without any strong environmental reason for not doing so.

4.6 The Core Strategy Inspector was clear upon the basis which he found the housing figure for the WMCA to be sound and at paragraph 378 of his Report he noted that 'the level of indicative housing contained in Core Policy 31 is proposed to be 2,060 homes, of which some 1,920 would be at Warminster...with due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers such an approach is justified adequately and I recommend accordingly (MM 66)'.

4.7 Main modification 66 is relevant and quoted below;

'At least 1,770 approximately 2,060 new homes will be provided. Of these about 1,920 ~~4,650~~ dwellings should occur at Warminster, between the existing built form and the A350 for strategic growth'

4.8 The Inspector advised that the additional housing required, above and beyond that to be delivered in the WWUE should be located between the existing built form of Warminster and the A350. He went on (paragraph 379) subsequent details of housing distribution can reasonably emerge through the sites DPD but this statement must be understood in context of paragraph 378 where the Inspector was clear that development would come forward between the A350 and the built form of Warminster.

4.9 The WMCA Topic Paper which underpins the WHSAP accepts that there is a residual requirement for housing of 462 dwellings and 200 dwellings are planned for. The WHSAP is not consistent with the WCS because it fails to deliver the requisite level of housing. It is suggested in table G.7 of the document that 'the West Warminster Urban Extension provides by far the largest part of new housing to serve the town and this area will continue to do so for several more years after 2026. This provides certainty and continuity to the supply of housing to the town...the level of development proposed at Warminster over the plan period is not so below the indicate level of the WCS that it significantly undermines the spatial strategy'.

4.10 The argument advanced is that we should not be seeking to meet the identified need to 2026 and that the residual need can be met in the years following the plan period. This argument should not be accepted because future delivery beyond 2026 will be going towards meeting the future need within the WMCA beyond 2026 which has not yet been calculated. In the meantime the Council's strategy is to leave part of the objectively assessed need unmet. The plan is not positively prepared in this regard.

4.11 WC are seeking to argue that the allocation of the WWUE acts to increase the surety of supply within the WMCA. The converse argument can be made with more force however. The lack of flexibility and over- reliance on one site could act to seriously undermine the surety of supply.

4.12 The following two tables show how the projected delivery of the WWUE has slipped over the last 3 years. Fig 1 is an extract from WC's Housing Land Supply Statement 2014 and Fig 2 is an extract from the 2017 interim statement. In 2014 it was envisaged that 215 dwellings would be completed during 2016/17 and 2017/18. The latest projection is for the site to begin delivering first completions from 2018/19 and then at a slower rate than previously expected. In total over the plan period the estimated delivery for the WWUE has been reduced from 1,200 dwellings to 793 dwellings over a period of less than 3 years.

Fig 1 – Extract from Housing Land Supply Statement 2014 showing projected delivery of WWUE

[See attached Appendix 1]

4.13 It is notable that at present the outline planning application (15/01800/OUT) for the development of the WWUE remains undetermined. There is no Committee resolution in place which would need to precede the preparation of a S106 agreement. There are existing objections to the planning application from a number of consultees including the Environment Agency, Natural England, AONB board, landscape officer, urban designer, drainage engineer.

Fig 2 - Extract from Interim Housing Land Supply Statement 2017 showing projected delivery of WWUE

[See attached Appendix 1]

4.14 The application is not therefore in a position to be approved at present and there has been little progress made with the application in the last two years since submission. It is entirely reasonable in this context to question the legitimacy of the suggestion that the site will be delivering completed dwellings from 2018. Even if a resolution were to be granted for the outline permission there would then be a likely hiatus of 3-6 months for the s106 agreement to be completed. There will thereafter be a requirement to prepare and submit the reserved matters

submissions for each phase. Only after reserved matters have been approved for the early phase and the necessary conditions have been discharged will it be possible for the site to begin construction and only sometime thereafter can it start to deliver completed dwellings. It is not possible to foresee a set of circumstances where the WWUE can start delivering dwellings in accordance with the latest published timescales in the 2017 interim Housing Land Supply Statement.

4.15 The strong likelihood is that the WWUE will not start delivering completions until at least 2019/20. As the WWUE comprises some 793 dwellings of a forecast supply of 881 dwellings it is expected to be the largest contributor to housing but that supply will be delayed which means that housing land supply position is much graver for the WMCA than reported by WC. Being optimistic, it is highly likely that at least a year's supply will be lost out of the Core Strategy period which equates a minimum of 100 additional dwellings not being built in WMCA. In this context additional housing land is required to ensure that the significant unmet need within Warminster does not grow further. In the absence of any contingency the WHSAP cannot be considered to be positively prepared.

5 MY CLIENT'S LAND IN WARMINSTER AND THE CASE FOR ITS INCLUSION AS AN ALLOCATED SITE

5.1 My Client's land is shown in the below (Fig 3) and as a scaled drawing in (Appendix 2) and at Fig 4 superimposed onto the SHLAA 2012 output map. My client's land has not hitherto been put forward for development under the 'call for sites' exercise. The site does however abut SHLAA site 2091. At the same time as this submission is being made the site is being put forward for registration on the SHLAA. Wiltshire Council's website is clear that any site put forward for the SHLAA will be reviewed in terms of its suitability on an annual basis but also that 'as soon as it is received it will be considered in the development of plans'.

Fig 3 – Land at Brick Hill being put forward for development

[See attached Appendix 1]

5.2 The land holding incorporates approximately 3.5ha of developable land when taking into account the need to safeguard existing vegetation along the boundaries and a hedgerow which crosses the site. The existing western boundary would be proposed for further tree planting in the form of a belt of a minimum of 10m in width which would be likely to reduce the developable area by a further 0.2ha. WC would require on site open space provision and it is proposed to at least meet the minimum level required.

Fig 4 – Land at Brick Hill, Warminster in relation to the SHLAA output map

[See attached Appendix 1]

5.2 The land holding incorporates approximately 3.5ha of developable land when taking into account the need to safeguard existing vegetation along the boundaries and a hedgerow which crosses the site. The existing western boundary would be proposed for further tree planting in the form of a belt of a minimum of 10m in width which would be likely to reduce the developable area by a further 0.2ha. WC would require on site open space provision and it is proposed to at least meet the minimum level required.

5.3 The WMCA has adequate levels of employment space being planned for when taking into account the demand has been identified to be for 7ha of space. The WWUE will provide 6ha and the balance is to be provided through smaller allocations. The land to the east of my Client's site is also put forward through the NP for allocation in future for employment needs. The shortfall in development within the WMCA has been shown to be in housing numbers rather than employment space. It is considered that my Client's land could be expected to contribute up to 110 dwellings towards the unmet housing requirement of which 30% would be affordable dwellings.

SUSTAINABILITY AND TRANSPORT IMPLICATIONS

5.4 In order to understand why my Client's land should be allocated for development it is important to understand the policy context underpinning the allocation of the WWUE. Section 2 of this report has outlined, using direct quotes, the reasons why the WWUE was chosen as the most sustainable site for a strategic level expansion of the town.

5.5 The Wiltshire LDF Strategic Transport Assessment (2009) formed a crucial part of the evidence base for 'Wiltshire 2026 Planning for Wiltshire's Future Strategic Sites Background Paper' October 2009. Both of these documents compare the sustainability credentials of the sites coming forward for development around Warminster. Fig 5 provides a map extract from the Strategic Transport Assessment (2009) showing the areas of search and (Fig 6) shows a summary of the accessibility of each of the areas of search for Warminster.

5.6 The Strategic Transport Assessment rated the areas of search based upon accessibility, bus connectivity, highway capacity, journey to work, access to a railway station and rail connectivity. Fig 6 includes the WWUE areas at sites B-H. It can be seen that all of the areas of search around Warminster score similarly with the exception of sites G and I which are either proposed for development or unavailable at present.

Fig 5 – The areas of search around Warminster

[See attached Appendix 1]

Fig 6 – The comparative scores of the areas of search

[See attached Appendix 1]

5.7 To put these figures into context the sites of the WWUE rank between 60-68 in terms of sustainability out of the 162 areas of search. Only Westbury of the 'B category' towns scored higher in terms of accessibility within Wiltshire. The areas of search for the following category B settlements all scored much lower than the WWUE – Ludgershall, Tidworth, Calne, Melksham, Marlborough, Devizes, Corsham, Amesbury and Wootton Bassett along with the 'A category' town of Chippenham. In relative terms then the area of the WWUE performed comparably to other sites around Warminster and considerably better than virtually all of the other similarly sized town's sites.

5.8 In this context it is eminently sensible to be seeking to achieve the housing need of Warminster, around Warminster. The identified unmet need should be met within this area and the Inspector concluded that in respect of Warminster itself the development of land should take place between the A350 and the existing built up area. This in practical terms should confine the area of search to land to the west or north west of Warminster.

5.9 My client's land has not been put forward to date as a possible development option and as one of the few remaining unallocated sites located between the A350 and the built up part of Warminster it requires consideration. The site directly to the south SHLAA site 2091 has bizarrely been excluded as a possible site to develop under the Council's methodology for site selection. The site itself has been recognised in the latest iteration of the SHLAA to be suitable for development and it relates extremely well to the WWUE directly to the south. The reason it has been excluded from further consideration is because it is more than 400m from a bus stop. The same criteria would apply to my Client's land however the Council's methodology fails to recognise that public transport connections will be improved shortly and that sustainability is ultimately a much wider consideration. The exclusionary criteria is therefore overly simplistic and flawed.

5.10 There is a specific requirement outlined within the WCS CP31 for the WWUE to provide a new bus service to the town centre. WC's Infrastructure Delivery Plan makes clear that the bus service should be a 30 min frequency (on weekday daytimes) connecting the WWUE and the town centre and that this will be delivered by 2021. There will also be a bus service provided for school children to get to Kingsdown School which is on the eastern side of Warminster town centre.

5.11 The below (Fig 7) is an extract from the travel plan which supports the current outline application which shows a new bus route with a 30 min frequency to be delivered servicing the roundabout access from Bath Road. This would bring my Client's land within 400m of the bus likewise for SHLAA land parcel 2081.

5.12 My Client's land already scored as highly and in some cases more highly than areas of the WWUE in terms of its sustainability and is directly comparable to the majority of sites around Warminster. The land has excellent connections to both the A350 and A36 and would reduce the level of cross town traffic which is an acknowledged problem within Warminster. The fact that my client's land will soon be within 400m of a bus stop would allow it to score significantly greater points when using the Council's Strategic Transport Assessment (2009) criteria. Taking this fact into account my client's land would be likely to become the most sustainable location for future growth around Warminster in terms of its accessibility.

Fig 7 – Travel plan extract from 15/01800/OUT showing proposed bus route with dashed dark blue line

[See attached Appendix 1]

5.13 The provision of the bus service is a requirement of the WWUE and is included within the pending planning application for the development of the site and has a timescale to be delivered prior to 2021. The allocation of my client's land will increase patronage of the new bus service making it a more sustainable long-term service. In light of these point it can reasonably therefore be taken into account in considering the suitability of my client's land. This point notwithstanding my client's land performs comparatively well to other Warminster sites, and much better than similar sized settlements areas of search, in sustainability terms even in the absence of a bus stop being within 400m of the site it can be justified to be brought forward now.

5.14 Whilst my client's land is not located in close proximity to the town centre itself it is actually located closer to the centre than the suggested allocation at 'Land east of the dene' which is the largest planned allocation at 100 dwellings. Furthermore my client's land benefits from its close proximity to the Warminster Services which is less than 300m from my clients site access. The Warminster services provides a

Travelodge hotel. Several restaurant including Little Chef, Burger King and Subway. It also has a BP garage and shop which provide for daily shopping requirements.

5.15 The WWUE will likewise provide for a local centre with use classes A1- A5, D1 community facilities and a new one and a half form primary school. There is a public footpath which connects the lane off Bath Road directly into the WWUE so it will be possible in the future for pedestrians and cyclists to access the local centre of the WWUE directly without needing to walk alongside the Bath Road and back into the development.

5.16 My client's land likewise has excellent access to employment opportunities. The Crusader Business Park and Warminster Business Park are located within walking distance of the site and is a major employment site within Warminster. The WWUE also proposes an area of employment comprising some 6 hectares at the northern tip of the allocation. Given also the proximity to the A36 and A350 the site is well located for local employment opportunities with excellent communications links.

5.17 The Warminster Neighbourhood Plan (NP) is a made plan and therefore forms part of the Development Plan. Fig 8 is an extract from the NP which shows the land to the east of my client's land has also been identified as a new/potential employment site. This is significant for two reasons firstly it shows that further employment is proposed within walking distance of my client's site thereby further enhancing its sustainability credentials and secondly the principle of development to the north of the existing settlement area has been considered to be acceptable in principle and the settlement will be expanded in this direction.

Fig 8 – Neighbourhood Plan spatial expression of development strategy

[See attached Appendix 1]

5.18 Access can be gained from the site onto the Bath Road. There is an existing access junction onto Bath Road which offers good visibility splays in both directions. The access would be capable of dealing with an increase in traffic patronage.

LANDSCAPE CONSIDERATIONS

5.19 My Client's land falls within the Cley Hill greensand and chalk terrace (G4) character area in the Wiltshire Landscape Character Assessment (2007) (WLCA). The most significant landscape feature within this area is Cley Hill, a chalk knoll hillfort which provides extensive views over surrounding areas. More generally the landscape character area comprises flat to gently undulating farmland. The field pattern consists of mostly medium sized, generally regular fields, often enclosed by mainly intact hedgerows with hedgerow trees.

5.20 The feature of Norridge Wood to the north west of Warminster is identified as a strong feature. The A36 and A350 which cut through the landscape to the west of Warminster are referenced as disturbing the landscape pattern in the WLCA.

5.21 Views into the site are limited. The land is raised above the A36 which was formed in a cutting. The top of the highway embankment is then marked by significant vegetation. In the form of a dense belt of trees in the southern half of the site and more sporadic trees within an established hedgerow to the northern part of the site. The eastern boundary of the site with the Bath Road has a dense belt of trees running the length of the site prohibiting views into the site from the east.

5.22 The only possible views into the site would be from the elevated position of the ridge of Cley Hill. The distance between the site and Cley Hill is approximately 3km at this point. Taking into account the distance and the strong intervening vegetation, particularly along the south part of the western boundary the impact on views from Cley Hill would be extremely limited. It is proposed that the landscape approach which is to be adopted at the WWUE could likewise be taken forward within my Client's site. The suggestion is for the existing tree lined buffer to be augmented with additional planting along the length of the western boundary of the fields to provide a denser vegetative screen. The WWUE proposes woodland structure planting comprising of locally indigenous species to create a strong edge and separation between the town and the countryside. The current proposed allocation could be designed to dovetail with this strategy.

5.23 The current site is less sensitive in landscape terms than the WWUE which is located in closer proximity to Cley Hill with views across the land. Given that the principle of the WWUE has been found to be acceptable it is argued that my Client's land can likewise be considered acceptable. The land in question forms a logical conclusion to the WWUE being situated as it is between two main roads to the west and east and a small access road to the south. It is adjacent to the WWUE and represents the completion of the infilling of the gap between the bypass and Warminster to the north and west of the settlement.

5.24 The site itself is grassed agricultural land which is currently underutilised forming two parcels of isolated agricultural land. The land is category 3b and 4 grade agricultural land (Fig 9) and therefore not the high quality land which paragraph 112 of the NPPF seeks to safeguard

from development. Fig 10 displays an aerial view of the site. There is an existing hedgerow with trees dividing the site west-east. This hedgerow would be retained as part of the development to safeguard its landscape and ecological value with the siting of buildings and internal access roads being designed to allow this to happen.

Fig 9 – Extract from MAGIC database showing the site to be Grade 3B and 4 agricultural land
 [See attached Appendix 1]

Fig 10 – Aerial view of the site
 [See attached Appendix 1]

5.25 The land is situated in between the A36 and the Bath Road. The site offers unparalleled visual and physical containment when compared to competing sites on the fringes of Warminster. The landscape has been affected at this point by the introduction of the A36, the large roundabout, and to a lesser but still noticeable extent by the Bath Road. The presence of these roads has limited the parcel of land size to reduce its usefulness for modern agricultural practices. There is clearly no argument to be made with this site that it may set a precedent for further expansion of the town being contained by the roads. In plan making terms it should be seen as a desirable site which may benefit from the WWUE facilities and enhanced connectivity whilst allowing for the necessary expansion of the town at a site which is not prominent from public view points.

ECOLOGY

5.26 Norridge Woods is a Local Wildlife Site (LWS) and is separated from the site by the A36. This is a significant barrier for faunal movement between the site and the woods. The separation distance from the WWUE was considered to be adequate to ensure any impacts on the woods would be negligible. The current site runs parallel to the woods but no closer to them than the WWUE in this regard it is expected that the impact would be similar to the WWUE.

5.27 Cley Hill is identified as a Site of Special Scientific Interest (SSSI) because it comprises botanically rich chalk grassland that supports many plants which are characteristic of the south and south-west England. The River Avon is a Special Area for Conservation (SAC) as is the Salisbury Plain a SAC. These sites are all though over 3km from the site in question and sufficiently separated from the site that its development would not result in any significant effects.

5.28 The site itself comprises grassed fields which have negligible ecological value. The hedgerows within the site are of mixed quality with some being continuous in nature and dense whilst other areas are more ‘gappy’. The network of hedgerows offer some ecological value and they are proposed to be largely retained if the site is developed. Overall there are no significant barriers from an ecological impact perspective that should stop the site coming forward for development. The proposed tree belt and areas of open space should also assist in safeguarding the ecological value of the site.

FLOODING

5.29 My Client’s land is situated exclusively in flood zone 1 (Fig 11). As such it passes the first step of the exclusionary criteria adopted by the Council. There are likewise no local flooding issue designations for the site and no history of drainage problems experienced by my Client at the land. There are no barriers to developing the site in this regard.

Fig 11 – Extract from Environment Agency to show the site is in flood zone 1
 [See attached Appendix 1]

Attached files (Please see Objective)

4734499 / 4734496 / 4734498

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

In the event that the Council is unwilling to make the amendment sought through this representation it will be necessary to address the Inspector at the examination in public because the representation raises issues which question the soundness of the plan.

Comment ID:	2736	Consultee S Walsh & Sons Ltd. S Walsh & Sons Ltd.	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134260	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[SP summary: Refer to attached representation in full. Representation argues that land at Quidhampton Quarry should be allocated for housing in the Wiltshire Housing Site Allocations Plan.]</p> <p>The Housing Site Allocations plan should include the allocation of the Quidhampton Quarry near Salisbury. As set out in the accompanying statement, this is justified because:</p> <ul style="list-style-type: none"> it is the largest single ownership brownfield site in Salisbury available for redevelopment, and capable of delivering 200-300 houses in a high-quality environment; it is located in an accessible, urban location adjacent to existing residential areas, and close to numerous services and facilities including schools, bus routes, and recreation; quarrying has ceased, and the site already has permission to be restored to a development platform; the site is allocated in the Core Strategy for employment, which establishes various parameters for development. But there is no market demand for it, and housing would be more suitable; re-grading and restoration of the site can be achieved quickly, such that the site can contribute to the 5-year housing supply which Wiltshire cannot currently demonstrate; the site must be considered for housing given the Government's drive for brownfield, including the creation of Brownfield Land Registers and the introduction of Permission in Principle 				
Attached files (Please see Objective)	4734559 / 4734561 / 4734527 / 4734558 / 4734560				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Quidhampton Quarry as an 'omission' site.				

Comment ID:	2737	Consultee S Walsh & Sons Ltd. S Walsh & Sons Ltd.	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134260	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.69 Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[SP summary: Refer to attached representation in full. Representation argues that land at Quidhampton Quarry should be included within the settlement boundary for Salisbury.]</p> <p>The Housing Site Allocations plan should include the allocation of the Quidhampton Quarry near Salisbury. As set out in the accompanying statement, this is justified because:</p> <ul style="list-style-type: none"> it is the largest single ownership brownfield site in Salisbury available for redevelopment, and capable of delivering 200-300 houses in a high-quality environment; it is located in an accessible, urban location adjacent to existing residential areas, and close to numerous services and facilities including schools, bus routes, and recreation; quarrying has ceased, and the site already has permission to be restored to a development platform; the site is allocated in the Core Strategy for employment, which establishes various parameters for development. But there is no market demand for it, and housing would be more suitable; re-grading and restoration of the site can be achieved quickly, such that the site can contribute to the 5-year housing supply which Wiltshire cannot currently demonstrate; the site must be considered for housing given the Government's drive for brownfield, including the creation of Brownfield Land Registers and the introduction of Permission in Principle 				
Attached files (Please see Objective)	4734527				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Quidhampton Quarry as an 'omission' site.				

Comment ID:	2738	Consultee S Walsh & Sons Ltd. S Walsh & Sons Ltd.	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134260	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[SP summary: Refer to attached representation in full. Representation argues that land at Quidhampton Quarry should be allocated for housing in the Wiltshire Housing Site Allocations Plan, as means to boost housing land supply in the South Wiltshire HMA.]</p> <p>The Housing Site Allocations plan should include the allocation of the Quidhampton Quarry near Salisbury. As set out in the accompanying statement, this is justified because:</p> <ul style="list-style-type: none"> it is the largest single ownership brownfield site in Salisbury available for redevelopment, and capable of delivering 200-300 houses in a high-quality environment; it is located in an accessible, urban location adjacent to existing residential areas, and close to numerous services and facilities including schools, bus routes, and recreation; quarrying has ceased, and the site already has permission to be restored to a development platform; the site is allocated in the Core Strategy for employment, which establishes various parameters for development. But there is no market demand for it, and housing would be more suitable; re-grading and restoration of the site can be achieved quickly, such that the site can contribute to the 5-year housing supply which Wiltshire cannot currently demonstrate; the site must be considered for housing given the Government's drive for brownfield, including the creation of Brownfield Land Registers and the introduction of Permission in Principle 				
Attached files (Please see Objective)	4734527				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2739	Consultee WebbPaton Client Group Person ID: 1134382	Agent Mr Nathan McLoughlin Director McLoughlin Planning Person ID: 404491	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.0 General Comments on the DPD</p> <p>1.1. McLoughlin Planning has been instructed to submit representations on behalf of various sites being promoted by Webbpaton (WP) throughout the County. The purpose of this document is to set out the respondent's position on the various sites and how they are treated through the emerging Housing Site Allocations DPD.</p> <p>Objective 1: To ensure there is a clear definition to the extent of the built- up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages</p> <p>1.2. WP support the objective of the DPD in defining the clear extent of these locations as this will address a previous deficiency highlighted in the Core Strategy Inspector's Report. This previous weakness identified a number of settlement boundaries as being out of date. Through meeting the CS housing requirements, the settlement boundaries will have to be redefined and where sites are promoted for development through this consultation, then the settlement boundaries should be so adjusted to accommodate development.</p> <p>Objective 2: To demonstrate a rolling five-year supply of deliverable land for housing development</p> <p>1.3. WP supports the need for the Council to maintain a 5-year housing land supply. This is critical in light of the fact that the Core Strategy Inspector recognising that the Council commitment to undertaking an early review of the CS.</p> <p>1.4. However, the context for preparing the HSADPD is the CS which is based on a housing target that was and still is in need of immediate review. Therefore, whilst the DPD is clearly assisting the Council in maintaining a 5-year supply figure, the level of provision conflicts with the requirements of Framework paragraph 47 that requires LPAs to ensure that a Local Plan meets the "full objectively assessed needs for market and affordable housing".</p> <p>1.5. As set out with a number of the representations, given the above, there is no specific limit on the allocations made by the DPD. As a result, there is flexibility for the number of allocations to be increased, over the 42,000 dwellings of the Core Strategy. The Council should consider the flexibility offered by the CS in this regard.</p> <p>1.6. Without the prompt review of the CS the Council will remain vulnerable to any application on a 5-year supply basis or one which successfully recalculates the OAN for the County, especially in light of the emerging SHMA work. As a result, WP take the view that given the expression of the CS housing target of 42,000 as a minimum and a recognition that few of the community sub-areas have no limitation placed on them for additional development over and above what is set out in the CS, then there is an opportunity for the HAS DPD to allocate additional land over and above the figures in any given CA, barring specific limitations in CA policy.</p> <p>Objective 3: To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy</p> <p>1.7. WP support the need of the HSADPD to allocate sites which accord with the CS. To do so would otherwise risk the HSADPD being found unsound as it is not in general conformity with the CS. WP still has concerns about the non-allocation of housing sites in the HSADPD and the inability of the plan to meet the requirements of Framework paragraph 47.</p> <p>Other Matters</p>				

1.8. WP is aware of the recent Cabinet Meeting of 12 September and welcomes the clear commitment to review the Core Strategy. Whilst the details of the emerging Local Plan's housing target remain confidential, the papers make reference with the fact that the current housing market areas in the Core Strategy will be subject to change. In preparing site allocations through the HSADPD, the Council should actively consider the implications of this HMA change, especially in light of a proposed Swindon HMA, which is likely (it is assumed) to have cross-boundary implications.

2.0 Site-Specific Representations

2.1. This Section of the document sets out site specific representations:

Potterne

2.2. Paragraph 4.3 sets out that there is a "priority" for housing land allocation to be located at the higher tier settlements (excluding Large Villages) that meets objective 2 of the plan. The respondent's position is that this is contrary to the general approach set out in the Core Strategy for the following reasons.

2.3. Core Strategy Core Policy 1 sets out the Settlement Strategy, identifying the various tiers of settlements across the County. Whilst the Policy sets out different requirements for each tier, the Policy does not set out any "priority" for where new development should be focused. This is further evidenced by Paragraph 4.15 of the

Core Strategy which sets out that the HSADPD will review settlement boundaries to allow new housing to come forward. In contrast, paragraph 4.3 of the HAS resembles a quasi-sequential approach to housing site allocations.

2.4. The submission site is located to the northeastern edge of Potterne and is well placed to deliver circa 40 dwellings, subject to masterplanning. The site comprises around 3.4ha of agricultural land, which is not subject to any form of policy or landscape designation and is not at an unacceptable risk of flooding. Furthermore,

development of the site would not have an adverse impact on the village conservation area.

2.5. The site is in a sustainable location with very good access to nearby bus stops and a convenience store. The main site access point would be created to the north of Blackberry Lane, off the A360. From this point there is a pedestrian footpath leading towards the centre of the village around 300m away. This could be used to access numerous other facilities, including a village hall, post office, public house, primary school and playing fields. The local bus services also provide good accessibility to larger settlements.

Pewsey

2.6. Pewsey is the only community Local Service Centre in the Community Area and is therefore the focal point for new development. Whilst the land available is considerable, a logical extension to the settlement could be provided immediately to the south of Pewsey.

2.7. Whilst Pewsey and the surrounding land fall within an AONB, the land immediately abutting the southern settlement boundary is already heavily influenced by existing residential development. Consequently, further residential development in this location would not necessarily be out of character. Moreover, the proper masterplanning of the site could provide opportunities for new landscaping to the south, which could provide a more appropriate transition between the settlement edge and the countryside beyond.

2.8. It is noted that there is extensive Grade 1 Agricultural Land surrounding Pewsey, however, the land to the south of the settlement is not afforded such status. Land to the south of Pewsey is not at risk of flooding and is not located within a conservation area. Moreover, land to the south of Pewsey is ideally located relative to the various services and facilities Pewsey has to offer.

2.9. Should the HSADPD lead to a review of the OAN for the County and/or require additional development over and above the minimum target of 42,000 dwellings, land to the south of Pewsey could provide such housing.

Bradford-on-Avon

2.10. This Green Belt site is located on the western edge of the town and immediately borders the playing fields of St Lawrence School and residential development at The Old Batch. The site comprises circa 16ha of agricultural land to which the main access point is from Winsley Road (B3108). The land is largely flat and set out as three distinctive arable fields with mature boundaries. The site is not subject to any formal landscape designations and is located within Flood Zone 1 (low risk) as defined the Environment Agency.

2.11. In terms of meeting strategic requirements, there is nothing in the Core strategy that prevents additional review of the green belt from taking place. Whilst the housing target for the CA has been met through commitments and completions, as set out in the general commentary on the HSADPD, the Plan is under delivering against its OAN as 42,000 is not the OAN. This area is therefore, promoted for housing development.

2.12. The site has a net capacity of around 325 dwellings, which could be achieved at a style and density similar to that of its surroundings. There is also sufficient space to provide for landscaping and public open space.

2.13. The site is in a sustainable location approximately one mile from the town centre where a range of services and facilities are available. There are also bus stops near to the site on Winsley Road, which provide links to Bath, Salisbury, Trowbridge, Westbury and Warminster. A train station is also located near the town centre on the Wessex mainline, which runs between Bristol and Southampton.

Calne

2.14. This circa 15 ha site is situated on the eastern edge of the town and is not subject to any specific environmental constraints which would prevent its development. The site is afforded good access from Sand Pit Road, which in turn is accessed off the A3102 Oxford Road. The site sits immediately adjacent an existing housing development and in close proximity to a significant business park. The site is also ideally located relative to the numerous services and facilities that Calne has to offer.

2.15. Given the expressed concerns about the Plan meeting an out-of-date housing target, this site is being promoted as a development opportunity.

Melksham

2.16. This circa 29 ha site is located to the west of Melksham. The site is generally flat and featureless and is not subject to any formal landscape designation. The site is accessed directly off Bath Road and has good access to the considerable level of services and facilities that Melksham has to offer as a Market Town. Moreover, the site is ideally located relative to the train station and nearby employment opportunities.

2.17. Whilst the fringes of the site are at risk from flooding, the size of the land is such that it could still accommodate a considerable level of housing, including appropriate levels of community facilities and green infrastructure. Subject to masterplanning, the site could yield circa 400 dwellings and could be phased accordingly.

2.18. Again, given the expressed concerns about the Plan meeting an out-of-date housing target, this site is being promoted as a development opportunity.

Trowbridge

2.19. WP object to the non-allocation of this land for housing development. Under the CS housing requirements, there is an outstanding requirement for 2,020 dwellings still to be met. It is understood that the site (SHLAA reference 3130) has been automatically excluded under the Council's site selection methodology because of its Green Belt designation.

2.20. In response, WP consider the Council's site selection methodology is flawed in this context as national guidance does not prescribe green belt development as a development of "last resort". Given the need to consider a significant level of housing at the Town, the lack of a Green Belt review is concerning in that without it, the DPD cannot demonstrate that it has considered all reasonable alternatives.

2.21. There can be wider sustainability benefits to development in the green belt, because of proximity to the town centre, relative to other opportunities. It is therefore recommended that the site is reconsidered as a housing allocation.

Crudwell

2.22. WP object to the non-allocation of land at Tuners Lane for housing for circa 30-40 dwellings (subject to masterplanning) and object to the allocation at Ridgeway Farm.

2.23. WP is disappointed to note that the site has not be considered in the supporting Malmesbury Area Topic Paper. This is because the site has been subject to pre- application advice (17/02801/PREAPP) with the Council and despite the proactive approach on the part of promoters, there does not appear to have been any subsequent consideration of the site in preparing the DPD. As a result, there is a need for development around the village to be reconsidered to ensure that any allocation is based on a robust and credible evidence base.

2.24. To reiterate, the site is a circa 3.75 acre field located on the western edge of Crudwell village. There is an existing field gate access in the southeast corner of the site, providing access from Turners Lane at a point within a 30 mph zone that commences at the western entrance to the village.

2.25. The site is relatively flat, with a very gentle gradual slope up from south to north, rising away from Turners Lane. The site is not subject to any formal landscape designations and is not at an unacceptable risk of flooding. Furthermore, there are no listed buildings in the proximity of the site and the site does not form part of the setting of the conservation area in the eastern part of the village.

Appended Representations by WebbPaton in respect of various sites

1. General comment s on the DPD

WebbPaton have been instructed to act for a number of landowning clients throughout Wiltshire to make representation on the Wiltshire Housing Site Allocation DPD.

Objective 1

WebbPaton would like to see an alteration of Clause 1.1 and Objective 1 so it states that there should be a revision of the settlement boundaries by adding a review to the settlement boundaries adjoining Swindon Borough Council's planning area, so that this fits with the commitment by Wiltshire Council 's Cabinet on 12th September 2017 to do a joint new HMA for Swindon and the M4 corridor with Swindon Borough Council. It would appear to be totally against this commitment if the Site Allocation DPD is agreed before this joint initiative is completed.

WebbPaton consider that the DPD will have to be redefined taking into account where sites are promoted for development through this consultation and adjust the settlement boundaries so to accommodate these developments. Clause 2.8 regarding settlement boundaries should be reviewed so it is in line with the NPPF as such development should be in sustainable locations as defined by planning law and the NPPF. As such, we see no need to continue to retain the policy of having defined settlement boundaries with a policy of restricting development. The Core Strategy should identify the allocated sites but should not prevent other sites from coming through because they are not within a settlement boundary where there is a lack of 5 year housing supply.

Objective 2

WebbPaton support the need for the Council to maintain a 5 year housing supply. Questions have to be asked as to whether the current strategic allocated sites such as those in Chippenham are currently delivering housing supply. We know that the Chippenham site is already behind schedule for housing delivery, questions have to be asked about the validity of the current 5 year land supply situation.

The Core Strategy Inspector recognised the need for Wiltshire Council to do an early review of the Core Strategy. Questions have to be asked as to the context of the HSADPD as it is based on a housing target that was and still is in need of an immediate review. Therefore this in direct conflict of NPPF paragraph 47 that requires Local Planning Authorities to ensure the Local Plan meets the "full objectively assessed needs for market and affordable housing". Therefore, paragraphs 2.9 and 4.25 of the WCS HSADPD need deleting or amendment.

As set out with a number of the representations, given the above, there is no specific limit on the allocations made by the DPD. As a result, there is flexibility for the number of allocations to be increased, over the 42,000 dwellings of the Core Strategy. The Council should consider the flexibility offered by the CS in this regard.

Without the prompt review of the CS the Council will remain vulnerable to any application on a 5-year supply basis or one which successfully recalculates the OAN for the County, especially in light of the emerging SHMA work. As a result, WebbPaton take the view that given the expression of the CS housing target of 42,000 as a minimum and a recognition that few of the community sub-areas have no limitation placed on them for additional development over and above what is set out in the CS, then there is an opportunity for the HASDPD to allocate additional land over and above the figures in any given CA, barring specific limitations in CA policy.

Objective 3

WebbPaton support the need of the HSADPD to allocate sites which accord with the CS. To do so would otherwise risk the HSADPD being found unsound as it is not in general conformity with the CS. WebbPaton still has concerns about the non-allocation of housing sites in the HSADPD and the inability of the plan to meet the requirements of Framework paragraph 47.

WebbPaton is aware of the recent Cabinet Meeting of 12th September and welcomes the clear commitment to review the Core Strategy. Whilst the details of the emerging Local Plan's housing target remain confidential, the papers make reference with the fact that the current housing market areas in the Core Strategy will be subject to change. In preparing site allocations through the HSADPD, the Council should actively consider the implications of the HMA change, especially in light of a proposed Swindon HMA, which is likely (it is assumed) to have cross-boundary implications.

Paragraph 2.10 Neighbourhood Plans are likely to be updated if there is an amendment of the Core Strategy. The wording needs to be amended so to allow additional sites to come forward.

Table 2.1 shows the Core Policy 2 proposing the Minimum Housing Requirement in each HMA. These need to be reviewed to take into account Swindon Council's needs on the boundary with Swindon in particular in the current Cricklade and Royal Wootton Bassett HMA, which we presume will become part of the Swindon and M4 Corridor HMA.

Questions have to be asked where the 24,740 dwellings in north and west Wiltshire are to be allocated. The evidence does not demonstrate how this figure has been arrived at considering the current demand for housing close to Swindon, as can be proven by the number of dwellings already built in Royal Wootton Bassett and Calne, both of which join Swindon which has a current lack of 5-year land supply. The 1,455 dwellings Indicative Requirement in Royal Wootton Bassett appears extremely low as Swindon Council alone has a requirement to build 1,466 dwellings per year and currently has less than 3 years' housing supply. Wiltshire Council has a duty to co-operate with Swindon, and the WHSADPD must take this into consideration. Moreover, no consideration appears to have been given to the economic benefits of the electrification of the Paddington to Cardiff railway line which will speed up journey times to London, adding to demand for housing near Swindon. Therefore we question the accuracy of the Royal Wootton Bassett and Cricklade CA total.

Table 4.2 needs to reflect the new Swindon and M4 Corridor HMA as proposed in the Cabinet meeting of 12th September 2017. WebbPaton's clients would also like to see housing numbers increase in the towns of Pewsey, Calne, Melksham, Bradford on Avon, Royal Wootton Bassett and the larger villages such as Crudwell. It appears completely wrong that those towns where builders have the highest demand and sell houses quicker than they can build them that Wiltshire Council has completely ignored this economic data.

Clause 4.8 refers to the SHLAA. The fact is that the Wiltshire SHLAA has not been updated since 2012 when a number of sites were rejected because they were outside the settlement boundary. Therefore, how can the sites capable of development have been properly assessed? In particular this SHLAA was conducted in the middle of a property recession. The revision of the HMA should be based on up to date housing demand and take into account sites brought forward by landowners/developers/promoters. A call for SHLAA sites was carried out in 2014 but nowhere in the evidence base have the sites that were put forward at this time been analysed, it appears this data is missing within the Wiltshire Council's evidence base.

Clause 4.14 states that opportunities in larger villages have not been explored. This is of concern as other Unitary Authorities and District Councils have considered such larger villages as they are in sustainable locations under the NPPF. Leaving this to Neighbourhood Plans results in poor planning.

4.21 Selection of Preferred Sites - WebbPaton's clients point out that despite previously making representations on various sites, there has been no dialogue or discussion with Wiltshire Council. The wording in 4.21 is misleading as Wiltshire Council have only looked at selected favoured towns and have never considered sites in Royal Wootton Bassett, west of Swindon, Calne, Pewsey, Bradford on Avon, and the larger villages as it does not suit the local councillors' wishes. Surely this is not a satisfactory methodology. Rather than taking economic data of where demand for housing and employment lies, the whole of this plan appears to be written totally around political reasoning.

Clause 4.25 - WebbPaton would like to point out that one thing which has been completely ignored is where houses sell, which is surely a fundamental constraint. The fact is that the highest demand for housing is nearest to the M4 at Swindon. In fact the demand here is one of the highest in the United Kingdom.

Table 4.7 showing north and west Wiltshire has a surplus of 2,710 houses is very misleading as it clearly states this is taking into account 2,086 windfall sites coming forward. If the strategic allocation at Chippenham is delayed these projections are completely flawed.

WebbPaton would like to see the number reviewed taking into account the new Swindon/M4 Corridor HMA requirements and the duty for Wiltshire to co-operate with Swindon Borough Council.

Table 4.9 - WebbPaton question the accuracy that 426 completions have happened in the Pewsey CA between 2006 and 2017. This does not appear to be supported by sales evidence.

Table 4.10 - we believe there is recent market evidence that there should be more housing in Bradford-on-Avon (greenbelt needs to be amended), Calne, Melksham and Bowerhill, Royal Wootton Bassett, the new Swindon and M4 Corridor HMA and Trowbridge. The evidence clearly points to higher numbers being required in these locations. The fact is that we are 11 years into the plan and towns such as Royal Wootton Bassett have no further allocations and therefore restricted from having development for 9 years. We do question the age of the evidence as a great deal has changed in the housing market since 2006. The fact that all of the housing has been built in under half of the Local Plan period demonstrates that these towns have a need for more housing allocations.

It appears wrong that the plan does not recognise in any way the economic powerhouse of neighbouring Swindon with its job supply and requirements for housing. We all know that Swindon is running out of suitable development land within its boundaries and is looking towards Wiltshire Council to assist with providing housing numbers. The WHSADPD is out of date completely if, as it does, it ignores the perils of Swindon's housing capacity. A great deal of weight led by politicians directs housing towards the inner rural towns in Wiltshire.

Unfortunately, due to the lack of road and railway infrastructure in Wiltshire these middle county locations do not attract as much demand for housing and employment when compared to Swindon and Royal Wootton Bassett. It is beyond belief that in the 21st century the whole of a Local Plan and its update can ignore Swindon. As such there has be justification to rewrite the WHSADPD and the Local Plan Review to fully recognise Swindon's existence and future requirements and as such the Housing Site Allocations, Settlement Plan Review and Appendix B amending the settlement boundaries also need to be rewritten. It is important to note the sites that WebbPaton have put forward later in this representation were all promoted via the SHLAA call for sites in 2014, the results of which have never been published as the most recent results are those of the 2012 SHLAA.

Before any progress is made with this WHSADPD, the SHLAA needs to be updated.

2. Site Specific Representations

This section of the document sets out site specific presentations for:

2.1 Bowerhill (14.640 acres)
Melksham and Bowerhill are ideally located close to the A350 road, one of few roads which nuns north to south within the county. Should the HSADPD lead to a review of the OAN and additional development is required, this site could provide housing.

2.2 Land north of Coped Hall, Swindon Road, Royal Wootton Bassett (54.774 acres)
This site is held under a Promotional Agreement by Gallagher Estates. The site sits due north of Coped Hall Business Park and adjoins the Malmesbury road with good connectivity to the M4 Junction 16. As part of the Swindon and M4 Corridor HMA review this site needs to be considered for housing.

2.3 Land north of Swindon Road, Royal Wootton Bassett (25.49 acres)
This site adjoins 2.2 above. If the joint Swindon and M4 Corridor HMA identifies the need for additional housing this site is available and should be considered for development.

2.4 Land immediately north of the railway line off Bincknoll Lane at Woodshaw, Royal Wootton Bassett (22.120 acres)
This site is in the location of the proposed Royal Wootton Bassett railway station. It benefits from being north of the railway line, therefore it is easily accessible to Royal Wootton Bassett town centre and the M4 Junction 16. If additional housing numbers are needed for the new Swindon and M4 Corridor HMA this site is suitable for development.

2.5 Land north of Bincknoll Lane, Woodshaw, Royal Wootton Bassett (64.669 acres)
This land is under Option to David Wilson Homes. Boyer Planning will be making their own representations. Again it is not landlocked by the railway and represents a good opportunity to make the additional housing numbers if the joint Swindon/Wiltshire HMA identifies the need for growth.

2.6 Land at Hook Street, Lydiard Tregoze, Swindon (423.432 acres)
This land is under an Option with Primegate (Hook North) Ltd. They control all of the 423.432 acres. The site is ideally located for a new settlement adjoining the urban area of West Swindon. The developer has carried out various surveys on ecology, archaeology, highways, landscape impact and local deliveries connection. This is a viable site suitable to provide new housing and employment development. If the joint Swindon & Wiltshire HMA progresses this site is available and suitable for development.

2.7 Land south of the A365 at Rotmd ponds Farm, Shurnhold, Melksham (36.696 acres)
Roundponds Farm has been identified by a number of developers as suitable for residential development. It is close to Melksham railway station and the Asda supermarket. If it is identified in the Melksham HMA that more houses are required, this land should be considered.

Attached files (Please see Objective)

4734525 / 4734523

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To fully articulate the case in front of the Inspector

Comment ID:	2740	Consultee Aster Homes	Agent Mr Matt Allsopp Principal Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134431	WYG Planning Person ID: 1134428	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Affordable Housing Provision The Strategic Housing Market Assessment (December 2011) (SHMA) provides a total net annual affordable housing need of 3,862 units. Assuming the North and West HMA makes up 60% of the proposed housing in Wiltshire, this translates to a requirement of circa 2,325 affordable units in HMA per year. With the present total requirement for 1,237 units per year in the HMA, the Plan is not providing a sufficient level of development to provide enough affordable housing for the HMA. More should be done within the Plan to try and bridge the gap and to provide affordable housing, particularly in sustainable locations. Allocate more sites that will provide much needed affordable housing.</p> <p>Summary The Housing Site Allocations Plan provides a significant surplus of housing in the North and West HMA based on the OAN. However, it is evident that the OAN is now out of date. Even if we accept the OAN, the level of delivery in the HMA is falling year on year and it is likely that the completion projections are too optimistic. There is an over reliance on strategic sites that have failed to deliver housing thus far. In addition to the under delivery, it is also clear that Wiltshire will not provide sufficient affordable housing across the plan period. Therefore, it should promote sites that will deliver affordable housing and reduce the affordable housing need. It is also evident that the Melksham CA Remainder area will have no planned development for the most part of the remaining plan period. This will result in small scale and unplanned development, which will not contribute towards infrastructure and the affordable housing shortage. Considering all the above, the allocation of non-strategic housing sites would help maintain delivery in the HMA and provide planned development in the Melksham CA Remainder area throughout the plan period. The land north of The Lye in Seend is a sustainable site that is well related to the settlement of Seend. The proposals provide significant improvements to local open space and sports facilities; in addition to affordable houses. At 45 dwellings, the site could be delivered within the next 2 years providing a boost towards housing land supply and help maintain the HMA's housing delivery.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2741	Consultee Aster Homes Person ID: 1134431	Agent Mr Matt Allsopp Principal Planner WYG Planning Person ID: 1134428	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.8			Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Housing Delivery</p> <p>The North and West Housing Market Area (HMA) has an annual requirement to provide 1,237 units. Carries forward undersupply from previous years. Apart from a single year, the position does not appear to be improving. The Housing Land Supply Statement (HLSS) shows that housing delivery has fallen short of this number in both 2014/2015 (1,139 units) and 2015/2016 (915 units). Topic Paper 3 on Housing Land Supply (HLS) states that the Council are making assumptions for the completions expected in Year 1 (2016/17), i.e. up to 31 March 2016, as well as for later years. Even then, Table 3.2 estimates 847 completions for the current year.</p> <p>This means that over the past three years, not only will housing completions be below the 1,237 unit requirement but also the level of delivery is falling and the under provision to be dealt with in the last 9 years of the plan period is increasing – making it continuously more difficult to meet the Plan requirements every year.</p> <p>The Plan is overly optimistic in predicting the level of completions, especially when considering the heavy reliance within the HMA on a small number of large strategic sites coming forward – one of the reasons for the under provision of housing in recent years. The Council’s approach is susceptible to changes in the market; such as weaker market conditions and land banking.</p> <p>This is evident from the Topic Paper 4 which confirms that it was first envisaged that the whole of the Ashton Park allocation would have been completed in the plan period, however it is now proposed that 1000 of the 2600 will come forward post 2026. It is likely that a site of this scale could be further delayed. This is also true of many of the strategic sites; such as the 650 units at Rawlings Green, 200 units at Elm Grove Farm, 150 units at White Horse Business Park, 180 units at Southwick Court, 205 units at Elizabeth Way and 100 units at East of the Dene.</p> <p>The trajectory of many of these dwellings are predicted to come forward within 5 years, but if they are delayed this would affect 5YHLS in years 3/4/5. In addition to this, too many windfall sites have been predicted in next 5 years as delivery in recent years do not match Council’s aspirations. Therefore, more allocations should be made to further protect the Plan from any of the large strategic sites underperforming.</p> <p>Allocate more non-strategic sites.</p> <p>Summary</p> <p>The Housing Site Allocations Plan provides a significant surplus of housing in the North and West HMA based on the OAN. However, it is evident that the OAN is now out of date.</p> <p>Even if we accept the OAN, the level of delivery in the HMA is falling year on year and it is likely that the completion projections are too optimistic. There is an over reliance on strategic sites that have failed to deliver housing thus far.</p> <p>In addition to the under delivery, it is also clear that Wiltshire will not provide sufficient affordable housing across the plan period. Therefore, it should promote sites that will deliver affordable housing and reduce the affordable housing need.</p> <p>It is also evident that the Melksham CA Remainder area will have no planned development for the most part of the remaining plan period. This will result in small scale and unplanned development, which will not contribute towards infrastructure and the affordable housing shortage.</p>				

	<p>Considering all the above, the allocation of non-strategic housing sites would help maintain delivery in the HMA and provide planned development in the Melksham CA Remainder area throughout the plan period.</p> <p>The land north of The Lye in Seend is a sustainable site that is well related to the settlement of Seend. The proposals provide significant improvements to local open space and sports facilities; in addition to affordable houses. At 45 dwellings, the site could be delivered within the next 2 years providing a boost towards housing land supply and help maintain the HMA's housing delivery.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>To promote the benefits of a better mix of allocations to help with 5YHLS and completions.</p>

Comment ID:	2742	Consultee Aster Homes Person ID: 1134431	Agent Mr Matt Allsopp Principal Planner WYG Planning Person ID: 1134428	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	2.3		Positively prepared Effective		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Melksham Community Area The Melksham Community Area (MCA) is required to deliver 2,370 units between 2006 – 2026. This is then split into the Melksham and Bowerhill village area and the Melksham CA Remainder area. The Community Area Topic Paper – Melksham (June 2017) designates Seend as a ‘Large Village’. The level of development that will be acceptable in these settlements will be "limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities". The Melksham Community Area is required to provide a minimum of 130 dwellings over the plan period, however there were 101 completions between 2006 and 2017. This has left only 29 more dwellings be required for the remainder of the plan period. Developable commitments for this area are 38 dwelling between 2017 and 2026, which means only an average of circa 4 dwellings will be built in this Melksham CA per year for the next 9 years and it is likely that many of these will be built in the next few years and leaving the area with no new houses for the rest of the plan period – particularly if in due course a restrictive neighbourhood plan is adopted in areas where they see that CS requirements have been met. This in the context of the ongoing housing crisis and NPPF which seeks to boost supply of housing. Assuming windfalls come forward in an alternative scenario, unplanned and small scale development without proper planning will preclude delivery of infrastructure, affordable housing and services needed to support new development. It would be better to identify small-mid sized development opportunities in sustainable locations and deliver any necessary supporting infrastructure alongside a larger site, rather than piecemeal windfall sites that won't deliver these benefits; including any affordable housing. As Topic Paper 4 states, the plan has a "significant reliance on large strategic housing sites to meet strategic requirements in the HMA. This has contributed to rates of development in recent years not reaching the rates of development implied by the WCS requirement for the HMA. It would however be unwise to place too much reliance on this being the case when some key strategic sites have yet to gain planning permission. The Plan should therefore look to allocate sites that can help to ensure a surety of supply. This is a justification for allocating sites for housing development to meet local needs at Large Villages where indicative requirements are not being met and there is not enough certainty that neighbourhood plans will provide for sufficient housing." New allocations should be made to deliver houses across the whole plan period. Summary The Housing Site Allocations Plan provides a significant surplus of housing in the North and West HMA based on the OAN. However, it is evident that the OAN is now out of date. Even if we accept the OAN, the level of delivery in the HMA is falling year on year and it is likely that the completion projections are too optimistic. There is an over reliance on strategic sites that have failed to deliver housing thus far. In addition to the under delivery, it is also clear that Wiltshire will not provide sufficient affordable housing across the plan period. Therefore, it should promote sites that will deliver affordable housing and reduce the affordable housing need.</p>				

	<p>It is also evident that the Melksham CA Remainder area will have no planned development for the most part of the remaining plan period. This will result in small scale and unplanned development, which will not contribute towards infrastructure and the affordable housing shortage. Considering all the above, the allocation of non-strategic housing sites would help maintain delivery in the HMA and provide planned development in the Melksham CA Remainder area throughout the plan period.</p> <p>The land north of The Lye in Seend is a sustainable site that is well related to the settlement of Seend. The proposals provide significant improvements to local open space and sports facilities; in addition to affordable houses. At 45 dwellings, the site could be delivered within the next 2 years providing a boost towards housing land supply and help maintain the HMA's housing delivery.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The over delivery in the Melksham CA Remainder will leave the area without new houses or development for many years. The case for a better distribution of development over the plan period can be made.</p>

Comment ID:	2743	Consultee Aster Homes Person ID: 1134431	Agent Mr Matt Allsopp Principal Planner WYG Planning Person ID: 1134428	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.5/4.7/4.8			Positively prepared Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land North of The Lye, Seend</p> <p>Aster Homes are promoting land in the 'Large Village' of Seend. The site is located north of The Lye and the Seend High Street (A361). This sustainable site is connected via pedestrian and cycle access to the village High Street and surrounding area. The site is within 0.3 miles to bus stops that provide routes to Devizes and Trowbridge and in close proximity to schools, recreational grounds, children's play areas, sports pitches, a place of worship, a pub and walking paths into the countryside with access to Kennet and Avon canal walks. Nearby Devizes, Melksham and Trowbridge have supermarkets and petrol stations as well as local community hospitals. Seend Church of England Primary School is situated only 0.7 miles from the site and Melksham Oak Community Secondary School located 2.5 miles away.</p> <p>The 8.2 acre site is suitable for development of up to 45 dwellings, 40% of which would be affordable and would form a significant help towards reducing the undersupply of affordable housing. Significant areas of informal open space are also proposed at the western portions of the site which are proposed to incorporate community facilities such as additional public open space and the potential for an overflow car park to serve The Lye Field.</p> <p>The site is available for development and could be brought forward within 2 years, helping boost housing land supply.</p> <p>Non-strategic sites like Land North of The Lye in Seend will help provide surity on delivery of houses and help meet housing land supply targets.</p> <p>Summary</p> <p>The Housing Site Allocations Plan provides a significant surplus of housing in the North and West HMA based on the OAN. However, it is evident that the OAN is now out of date.</p> <p>Even if we accept the OAN, the level of delivery in the HMA is falling year on year and it is likely that the completion projections are too optimistic. There is an over reliance on strategic sites that have failed to deliver housing thus far.</p> <p>In addition to the under delivery, it is also clear that Wiltshire will not provide sufficient affordable housing across the plan period. Therefore, it should promote sites that will deliver affordable housing and reduce the affordable housing need.</p> <p>It is also evident that the Melksham CA Remainder area will have no planned development for the most part of the remaining plan period. This will result in small scale and unplanned development, which will not contribute towards infrastructure and the affordable housing shortage.</p> <p>Considering all the above, the allocation of non-strategic housing sites would help maintain delivery in the HMA and provide planned development in the Melksham CA Remainder area throughout the plan period.</p> <p>The land north of The Lye in Seend is a sustainable site that is well related to the settlement of Seend. The proposals provide significant improvements to local open space and sports facilities; in addition to affordable houses. At 45 dwellings, the site could be delivered within the next 2 years providing a boost towards housing land supply and help maintain the HMA's housing delivery.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To present the clear benefits on bringing forward this site in the context of little development in the CA over the remaining plan period.

Comment ID:	2744	Consultee Aster Homes Person ID: 1134431	Agent Mr Matt Allsopp Principal Planner WYG Planning Person ID: 1134428	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.1		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Baseline Data</p> <p>In the first instance, we believe that the baseline data that the whole plan is based on is out of date. The recent Government Whitepaper 'Planning for the right homes in the right places: consultation proposals' discusses its proposed approach to calculating the local housing need. This states that "the most recent official projections should be used, with the household growth calculated for the period over which the plan is being made ... We therefore propose that projections of household growth should be the demographic baseline for every local authority area ... The Office for National Statistics' projections for numbers of households in each local authority are the most robust estimates of future growth." Planning Policy Guidance on Housing and Economic Development Needs Assessments supports this position by requiring, "wherever possible, local needs assessments should be informed by the latest available information".</p> <p>Since the publication of the Strategic Housing Market Assessment (December 2011) (SHMA) these projections have been updated twice. However, the plan does not acknowledge this shortcoming.</p> <p>In addition to this, the methodology that was used to create this SHMA pre-dates the National Planning Policy Framework (NPPF) and conforms to CLG Guidance (PPS3 Housing 2010 and Practice Guidance Version 2 (2007)) rather than current planning policies and guidance.</p> <p>Even when using this older guidance, the agreed housing requirement in the adopted Wiltshire Core Strategy is below the OAN for the area, which was in the region of 44,000 units.</p> <p>Update SHMA and use this data to review OAN.</p> <p>Summary</p> <p>The Housing Site Allocations Plan provides a significant surplus of housing in the North and West HMA based on the OAN. However, it is evident that the OAN is now out of date.</p> <p>Even if we accept the OAN, the level of delivery in the HMA is falling year on year and it is likely that the completion projections are too optimistic. There is an over reliance on strategic sites that have failed to deliver housing thus far.</p> <p>In addition to the under delivery, it is also clear that Wiltshire will not provide sufficient affordable housing across the plan period. Therefore, it should promote sites that will deliver affordable housing and reduce the affordable housing need.</p> <p>It is also evident that the Melksham CA Remainder area will have no planned development for the most part of the remaining plan period. This will result in small scale and unplanned development, which will not contribute towards infrastructure and the affordable housing shortage.</p> <p>Considering all the above, the allocation of non-strategic housing sites would help maintain delivery in the HMA and provide planned development in the Melksham CA Remainder area throughout the plan period.</p> <p>The land north of The Lye in Seend is a sustainable site that is well related to the settlement of Seend. The proposals provide significant improvements to local open space and sports facilities; in addition to affordable houses. At 45 dwellings, the site could be delivered within the next 2 years providing a boost towards housing land supply and help maintain the HMA's housing delivery.</p>			

Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2745	Consultee Aster Homes	Agent Mr Matt Allsopp Principal Planner	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1134431	WYG Planning Person ID: 1134428	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.53		Justified Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Amendment to Settlement Boundary Paragraph A.53 of the WHSA Plan in Appendix A: Amending settlement boundaries reviews the settlement boundary for Seend. This amends boundary to exclude recreational / amenity space more closely related to the open countryside. This amendment should not be retained as they are not in compliance with the revised settlement boundary review methodology, as set out in Topic Paper 1. This states that areas which should be included within the settlement boundary are "recreational or amenity space at the edge of a settlement that relates more closely to the built environment".</p> <p>The recreation space that is proposed to be removed, grid reference H6, I6, I7 of the Seend Proposals for Revised Settlement Boundaries map, is clearly more closely related to the built environment than to the countryside. This land is enclosed on three sides (east, south and west) by built development and is enclosed on the north by a hedgerow. This land has virtually no relationship to the open countryside and should, therefore, be included within the settlement boundary of Seend.</p> <p>Retain recreation land north of High Street/A361 within the settlement boundary.</p> <p>Summary The Housing Site Allocations Plan provides a significant surplus of housing in the North and West HMA based on the OAN. However, it is evident that the OAN is now out of date.</p> <p>Even if we accept the OAN, the level of delivery in the HMA is falling year on year and it is likely that the completion projections are too optimistic. There is an over reliance on strategic sites that have failed to deliver housing thus far.</p> <p>In addition to the under delivery, it is also clear that Wiltshire will not provide sufficient affordable housing across the plan period. Therefore, it should promote sites that will deliver affordable housing and reduce the affordable housing need.</p> <p>It is also evident that the Melksham CA Remainder area will have no planned development for the most part of the remaining plan period. This will result in small scale and unplanned development, which will not contribute towards infrastructure and the affordable housing shortage.</p> <p>Considering all the above, the allocation of non-strategic housing sites would help maintain delivery in the HMA and provide planned development in the Melksham CA Remainder area throughout the plan period.</p> <p>The land north of The Lye in Seend is a sustainable site that is well related to the settlement of Seend. The proposals provide significant improvements to local open space and sports facilities; in addition to affordable houses. At 45 dwellings, the site could be delivered within the next 2 years providing a boost towards housing land supply and help maintain the HMA's housing delivery.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to	Make the case why this land is not related to the countryside but is related to the urban environment				

participate at the oral part of the examination?	
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Comment ID:	2746	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> Wiltshire Council (SDC) policy H19 identifies the site as falling within or close to a “housing restraint area”. No further development should be allowed in this area lest the trees and natural beauty that frame the southern aspects of Salisbury should be ruined. Wiltshire Council (SDC) policy D2 permits infill development where proposals respect or enhance the character or appearance on an area. I do not believe this development meets the criteria. The development will have affordable homes in an area that is generally gentile. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2747	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> I am concerned that there is inadequate flood relief and arboreal study and that the consequences, clarity and protection such that the scope of the tree removal and earth works can be assessed as acceptable. Should the development proceed without this essential clarity and unacceptable damage (flooding and environmental are 2 aspects) occur then reinstatement will not be possible and the skyline ruined for generations. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2748	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> • Wiltshire Council (SDC) policy D2 permits infill development where proposals respect or enhance the character or appearance on an area. I do not believe this development meets the criteria. The development will have affordable homes in an area that is generally gentile. • The density of dwellings in the area would fall below Her Majesty's Government PPS 3 guidance. A developer may think this is acceptable but I do not. • Not only will the roads be overloaded but so will local services; hospitals, GPs, schools, welfare, etc. Existing local residents will pick up the tab for this plan. Over time these demands will force disproportionate rises in the Community Tax. This will be especially true if the mix of affordable housing is a high %age. • All these matters will be considerably enhanced, for the worst, during the construction years. Should this go ahead then Considerate Constructor Scheme Ultra Standard should be mandatory. • Wiltshire Council should guarantee that the Community Tax will be capped to protect current local residents if this scheme is allowed to progress. • I do not believe the aesthetics of the proposed development are in keeping with the area. Salisbury will become an increasingly unattractive place to live. <p>I am happy to represent my views at whatever forum is available and ask that I be given every opportunity to express my serious reservations to this development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2749	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> I also object to the increased noise disturbance. The woodland near the proposed site is a natural owl habitat and the increased noise hazard and loss of woodland may drive them out. The whole area is alive with badgers that set and roam freely at present. All these life forms must be protected. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2750	Consultee mrs christine steel	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1068308		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Here are my comments on the above plan:- I am very concerned about the number of additional houses proposed in the plan for Trowbridge and Warminster and the impact this may have on traffic coming through Bradford on Avon. I believe that this amount of additional housing is bound to increase the traffic coming through Bradford which is already choked with traffic. The pollution in Bradford already exceeds the European limit and during the rush hour the air quality is so bad that walking home from the town at that time can make one feel quite ill - I have seen people using a hanky as a mask. Bradford cannot take any more traffic and this should be taken into consideration when deciding the outcome of this plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2751	Consultee mrs christine steel	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1068308	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Here are my comments on the above plan:- I am very concerned about the number of additional houses proposed in the plan for Trowbridge and Warminster and the impact this may have on traffic coming through Bradford on Avon. I believe that this amount of additional housing is bound to increase the traffic coming through Bradford which is already choked with traffic. The pollution in Bradford already exceeds the European limit and during the rush hour the air quality is so bad that walking home from the town at that time can make one feel quite ill - I have seen people using a hanky as a mask. Bradford cannot take any more traffic and this should be taken into consideration when deciding the outcome of this plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2752	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> Salisbury is already congested. The park & rides are a failure and local commerce has suffered. This proposed development will gridlock Salisbury and make life a misery for all concerned, indefinitely. Either that or traffic congestion relief and additional, as yet unplanned road works, will become necessary and the green belt destroyed. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2753	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> • There is insufficient employment locally for the additional numbers attracted to the area and accommodated in these homes. This will either increase the numbers commuting outside Wiltshire for daily work or increase the local unemployment. The former will burden the railways and commuter roads and the latter place another burden on the Local Authority which has already suffered 30% budget cuts since 2010. But the real sufferer will be the local community. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2754	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> Wiltshire Council (SDC) policy H19 identifies the site as falling within or close to a “housing restraint area”. No further development should be allowed in this area lest the trees and natural beauty that frame the southern aspects of Salisbury should be ruined. Wiltshire Council (SDC) policy D2 permits infill development where proposals respect or enhance the character or appearance on an area. I do not believe this development meets the criteria. The development will have affordable homes in an area that is generally gentile. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2755	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> I am concerned that there is inadequate flood relief and arboreal study and that the consequences, clarity and protection such that the scope of the tree removal and earth works can be assessed as acceptable. Should the development proceed without this essential clarity and unacceptable damage (flooding and environmental are 2 aspects) occur then reinstatement will not be possible and the skyline ruined for generations. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2756	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> Wiltshire Council (SDC) policy D2 permits infill development where proposals respect or enhance the character or appearance on an area. I do not believe this development meets the criteria. The development will have affordable homes in an area that is generally gentile. The density of dwellings in the area would fall below Her Majesty's Government PPS 3 guidance. A developer may think this is acceptable but I do not. Not only will the roads be overloaded but so will local services; hospitals, GPs, schools, welfare, etc. Existing local residents will pick up the tab for this plan. Over time these demands will force disproportionate rises in the Community Tax. This will be especially true if the mix of affordable housing is a high %age. All these matters will be considerably enhanced, for the worst, during the construction years. Should this go ahead then Considerate Constructor Scheme Ultra Standard should be mandatory. Wiltshire Council should guarantee that the Community Tax will be capped to protect current local residents if this scheme is allowed to progress. I do not believe the aesthetics of the proposed development are in keeping with the area. Salisbury will become an increasingly unattractive place to live. <p>I am happy to represent my views at whatever forum is available and ask that I be given every opportunity to express my serious reservations to this development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2757	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> I also object to the increased noise disturbance. The woodland near the proposed site is a natural owl habitat and the increased noise hazard and loss of woodland may drive them out. The whole area is alive with badgers that set and roam freely at present. All these life forms must be protected. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2758	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> Salisbury is already congested. The park & rides are a failure and local commerce has suffered. This proposed development will gridlock Salisbury and make life a misery for all concerned, indefinitely. Either that or traffic congestion relief and additional, as yet unplanned road works, will become necessary and the green belt destroyed. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2759	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> • There is insufficient employment locally for the additional numbers attracted to the area and accommodated in these homes. This will either increase the numbers commuting outside Wiltshire for daily work or increase the local unemployment. The former will burden the railways and commuter roads and the latter place another burden on the Local Authority which has already suffered 30% budget cuts since 2010. But the real sufferer will be the local community. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2760	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> Wiltshire Council (SDC) policy H19 identifies the site as falling within or close to a “housing restraint area”. No further development should be allowed in this area lest the trees and natural beauty that frame the southern aspects of Salisbury should be ruined. Wiltshire Council (SDC) policy D2 permits infill development where proposals respect or enhance the character or appearance on an area. I do not believe this development meets the criteria. The development will have affordable homes in an area that is generally gentile. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2761	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> I am concerned that there is inadequate flood relief and arboreal study and that the consequences, clarity and protection such that the scope of the tree removal and earth works can be assessed as acceptable. Should the development proceed without this essential clarity and unacceptable damage (flooding and environmental are 2 aspects) occur then reinstatement will not be possible and the skyline ruined for generations. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2762	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<ul style="list-style-type: none"> • The density of dwellings in the area would fall below Her Majesty's Government PPS 3 guidance. A developer may think this is acceptable but I do not. • Not only will the roads be overloaded but so will local services; hospitals, GPs, schools, welfare, etc. Existing local residents will pick up the tab for this plan. Over time these demands will force disproportionate rises in the Community Tax. This will be especially true if the mix of affordable housing is a high %age. • All these matters will be considerably enhanced, for the worst, during the construction years. Should this go ahead then Considerate Constructor Scheme Ultra Standard should be mandatory. • Wiltshire Council should guarantee that the Community Tax will be capped to protect current local residents if this scheme is allowed to progress. • I do not believe the aesthetics of the proposed development are in keeping with the area. Salisbury will become an increasingly unattractive place to live. <p>I am happy to represent my views at whatever forum is available and ask that I be given every opportunity to express my serious reservations to this development.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2763	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> I also object to the increased noise disturbance. The woodland near the proposed site is a natural owl habitat and the increased noise hazard and loss of woodland may drive them out. The whole area is alive with badgers that set and roam freely at present. All these life forms must be protected. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2764	Consultee Joanne Clews	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134495		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to submit my objection to the proposed planning application to develop Southwick Court Farm. I have lived next to these fields for 15 years and on uncountable occasions have witnessed major flooding. This area is prone to flooding and I am sure that any houses built here will be subject to being flooded. In addition there is a ditch which runs alongside our house which is the only thing which has prevented our house from being flooded however it has been very close sometimes and water has run off the field, filled the ditch and spilled over onto our land. Surely this water will be further displaced if building is allowed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2765	Consultee Joanne Clews	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134495	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We have numerous species of bird and wildlife which lives in the local trees and surrounding area and removing their habitat will displace them. I have even seen bats circling the tree next to our house, which I thought were a protected species.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2766	Consultee Joanne Clews	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134495		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	My main objection is the lack of public services in this area to sustain an increase in population. Our local schools are already over subscribed and there is a lack of doctors and dentists in this area. In addition there are so many empty shops in the town centre that surely developing the infrastructure of Trowbridge should take priority. Continuously building new properties with no facilities is a ridiculous idea and will only further breed discontent especially within the younger generation. Teenagers especially in our area have very little to do with their time which causes them to be disruptive. I work for Barnardos with teenagers and their biggest complaint is that their parents have to work all hours to pay the bills so not only do they not feel supported but parents can not afford to pay for extra curricular activities. Therefore they hang around the street corners and in the town park where they are easy prey for unsavoury characters.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2767	Consultee Joanne Clews	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134495		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>It defies belief as to why anyone would want to build houses on a beautiful green area when half of Trowbridge town centre is prime development sites with derelict buildings on. Surely any logical individual must see that developing the brown field sites is a much more appropriate way to go.</p> <p>I implore you to reconsider this proposal and instead consider investing and concentrating on improving our failing town. We need central regeneration before Trowbridge ends up being a sprawling town of houses with no centre or community and no facilities. Otherwise our next generation will be discontented and disillusioned which is not a world I want to leave for my children.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2768	Consultee Joanne Clews	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134495	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am assuming that the proposed houses will not be the cheap first time purchasing properties that are actually required in this area, instead they will be more up market properties who will not benefit the local community at all.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2769	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> Salisbury is already congested. The park & rides are a failure and local commerce has suffered. This proposed development will gridlock Salisbury and make life a misery for all concerned, indefinitely. Either that or traffic congestion relief and additional, as yet unplanned road works, will become necessary and the green belt destroyed. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2770	Consultee Mr & Mrs W D & A M Whiting	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134443	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> There is insufficient employment locally for the additional numbers attracted to the area and accommodated in these homes. This will either increase the numbers commuting outside Wiltshire for daily work or increase the local unemployment. The former will burden the railways and commuter roads and the latter place another burden on the Local Authority which has already suffered 30% budget cuts since 2010. But the real sufferer will be the local community. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2771	Consultee Claire Buxton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134553		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing about the proposed allocation of an additional 40 houses to the village of Crudwell on the Ridgeway Farm site as detailed in the draft Site Allocations Plan as I have concerns about the scale of the development on one site. The main reasons being the potential impact on the drain and sewerage & risk of flooding, the increased traffic on Tetbury lane and the effects of this size of development in one go on the primary school.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2772	Consultee Claire Buxton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134553	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell still has severe flooding problems and this is a huge concern to people in the village - many of who have experienced bad damage to their homes through surface water and also raw sewerage. I am concerned that significant development on this site (due to it's position) will make things significantly worse.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2773	Consultee Claire Buxton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134553	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The school is at capacity and has no current plans to expand - it would need an additional classroom and hall space and as far as I am aware there are no guarantees that planning will be granted for this and this has not been looked into.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2774	Consultee Claire Buxton Person ID: 1134553	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Aside from this I do not feel that it is necessary to have this site allocated. The council's own guidance states that housing sites will only be allocated where there is a strategic priority to do so? From the data available, the Site Allocation Plan currently results in an oversupply of some 4,300 dwellings to 2026 when you take into account past completions with deliverable commitments and windfall sites; even excluding windfall sites, the oversupply is still 2,200 across the housing market area. More specifically, the Site Allocations Plan results in an oversupply of homes in the Malmesbury Community Area; Wiltshire Council also has a history of oversupply of dwellings - in eight of the last ten years, more homes have been built than planned and over that period the over supply has been over 140% of target. On that basis there is no strategic need or justification to allocate new homes in Crudwell and the Draft Site Allocations Plan should not do so. I realise that 'Crudwell must take it's fair share' of houses but we need to understand what this is and what it means. Policy 1 of the Wiltshire Core Strategy notes that the "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", as we have circa 250 homes in Crudwell, I feel that an additional 40 homes on top of the 10 already being built (20% increase overall)- falls outside Wiltshire Councils own Core strategy.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2775	Consultee Claire Buxton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134553		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Finally the site size of the Ridgeway Farm Development encompasses an area far greater than is required - even for 40 homes - so I am concerned that there are plans for even more houses (and again the issues that this might bring). Like others in the village I am questioning why that is the case and would like it reviewed.</p> <p>I would like development in Crudwell to be led by the Neighbourhood Plan so we can examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads (narrow and busy at certain times) and the local school, which is at capacity. I still question why we are too late to do this if we are able to move quickly with our plan?</p> <p>I do not oppose the number of house per se, but rather than being allocated one site (because that is the only option which previously came up for assessment)- I would like the development of a Neighbourhood plan to look into/address all the issues and options for the village and shape this so we can get an outcome which works for the village and for Wiltshire Council in terms of housing needs in the area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2776	Consultee Mr Michael Lock Person ID: 1134561	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Policy		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Please accept this letter as my opposition to the proposed further develop of the Ridgeway Farm Site. I am not anti-development; and acknowledge the need for additional housing, but I and other Crudwell parishioners wish to have a say in where and how further development of the village should proceed.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met.</p> <p>Together with the 10 dwellings already being built on the Ridgeway Farm site, the proposed further 40 dwellings represents an almost 20% increase to the village of currently some 260 dwellings. This increase appears to be excessive for the village. I believe that there can be no strategic need for a site of this scale in Crudwell.</p> <p>I understand that your Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so, however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account.</p> <p>Policy 1 of Wiltshire’s Core Strategy states that “Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities.” but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy.</p> <p>Previous proposals for additional housing at the site in question have led to significant debate about issues, such as, the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. Previous development on the site was not granted based on numerous concerns raised by the villagers. Furthermore, there is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.</p> <p>It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development.</p> <p>Many houses in Crudwell, INCLUDING MY OWN, have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development. In periods or heavy or persistent rainfall, even now the sewerage manhole at the end of the culdesac where I live overflows. The water utilities have been informed but nothing has happened, it appears that the pumping station on the other side of the ford (by the Mayfield Hotel) has inadequate capacity!</p>				

	In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2777	Consultee Dr and Mrs Terence and Amanda J Wood	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134567	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Effective	
		<p>Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.</p> <p>No requirement from local population. No consultation with those most affected. Affordable housing impossible. Keep to existing settlement boundaries. Ensure a local need by fully canvassing local need. Stop ribbon development. Do not jeopardise safety of existing residents. I am writing to object in the strongest possible terms to the proposed development of 30 dwellings to the East of Farrells Field in Yatton Keynell. This proposed residential site is outside the existing settlement boundary and, if allowed to proceed, would open the flood gates for even larger scale building as it sets a precedent which could seriously jeopardise the future character of this Cotswold village. Furthermore the proposed development would link Yatton Keynell to Coldharbour and Tiddlewink resulting in ribbon development. The area of land is clearly more closely related to the countryside than to the settlement and should be left to the wildlife it contains. A quotation from PPS4 Planning for Sustainable Economic Growth (2009) at EC6.1: "Local planning authorities should ensure that the countryside is protected for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all." Indeed there is no local need that I am aware of for these proposed dwellings at all.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2778	Consultee Dr and Mrs Terence and Amanda J Wood Person ID: 1134567	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.12				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No requirement from local population. No consultation with those most affected. Affordable housing impossible. Keep to existing settlement boundaries. Ensure a local need by fully canvassing local need. Stop ribbon development. Do not jeopardise safety of existing residents. We live in a quiet cul-de-sac of 15 homes. There exist around 40 cars, many of which park on the road out of necessity. The proposal for using the existing Farrells Field road to access the new site is outrageous. This would materially change the lives of all those living in Farrells Field. We, at 1Farrells Field would be severely impacted by higher noise and air pollution levels by an estimated 80 additional cars accelerating away from the side of our house.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2779	Consultee Dr and Mrs Terence and Amanda J Wood	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134567		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No requirement from local population. No consultation with those most affected. Affordable housing impossible. Keep to existing settlement boundaries. Ensure a local need by fully canvassing local need. Stop ribbon development. Do not jeopardise safety of existing residents. The proposal to include "affordable housing" is laughable. The previous attempt at this in Blacksmiths Close had extremely small terraces at a price of Y. million!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2780	Consultee Dr and Mrs Terence and Amanda J Wood Person ID: 1134567	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.12				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No requirement from local population. No consultation with those most affected. Affordable housing impossible. Keep to existing settlement boundaries. Ensure a local need by fully canvassing local need. Stop ribbon development. Do not jeopardise safety of existing residents. It is extremely difficult to find information regarding this matter on the council website to the extent that it would put many people off sending in objections. In this regard please cater for this when assessing the scale of objections put forward. Furthermore, documentation states that a public consultation was undertaken . Nobody has canvassed my opinion at all. Surely the people most affected by planning proposals should be the first consulted. Indeed there is no local need that I am aware of for these proposed dwellings at all.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2781	Consultee Ms Sophie Hodgson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134590		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I am writing to express my concern regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Draft Site Allocations Plan.</p> <p>Together with the 10 dwellings already being built on this site, this represents a near 20% increase in dwellings in the village of Crudwell (currently some 260 dwellings).</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell:</p> <p>Oversupply is forecast across the wider Housing Market Area (North & West Wiltshire), so there is no need to build an additional 40 houses in Crudwell</p> <p>Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation; this is therefore inconsistent with the Strategy.</p> <p>It is important that any further allocation of sites for more housing should be based on a genuine and strategic need and should take into account the legitimate and real concerns around drainage and flooding, school capacity, road safety, impact on the environment and more widely, on general infrastructure to support a larger community such as access to health care services, public transport, local services and amenities, secondary level schooling, etc.).</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, Crudwell parishioners (through the Crudwell Neighbourhood Plan) should determine the scale and location of housing need in Crudwell. I am not anti-development, but any development needs to be proportionate, appropriate and well-thought out to ensure that current and future residents live in a place that is capable of meeting their needs effectively and sustainably without degrading the environment and stretching local services, etc., to (or beyond) breaking point.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2782	Consultee Ms Sophie Hodgson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134590		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2783	Consultee Ms Sophie Hodgson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134590		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell Primary School is already greatly over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2784	Consultee Ms Sophie Hodgson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134590		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2785	Consultee Ms Elizabeth Churchill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134604		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With regard to the site application for a further 40 dwellings on the Ridgeway Farm in Crudwell, I would like to raise serious objections on the following grounds:</p> <p>a) The influx of additional residents which a site of this size would bring to the village would have a very negative impact on a village school which is already full to capacity. Although plans may be projected to increase the size of the school in due course, the practical time span for this to be effected is far outside the time within which the projected new houses would be completed and occupied. More importantly, there are already major issues around the school site with regard to parking and the safety of children in a small village with very narrow pavements alongside a major road heavily used by large vehicles - both agricultural and commercial.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2786	Consultee Mrs C Long	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446826		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst I can see the need for housing development in the area, especially for affordable housing two things concern me – The effect on Salisbury hospital in having to care for a vastly increased population (including the army personnel being relocated in the area) and the possibility that houses may be built on flood plain areas.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2787	Consultee Ms Elizabeth Churchill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134604	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I live in Tetbury Lane. Every time there is a moderate to heavy shower I watch the road turn into a stream - I have photographic evidence of this. The drain directly outside my property simply cannot cope with the combination of heavy rainfall and the inevitable residue which is a result of living on a lane in an agricultural area, again heavily frequented by agricultural vehicles.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2788	Consultee Ms Elizabeth Churchill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134604	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As mentioned above, usage of Tetbury Lane is heavy, both by huge agricultural vehicles and by large container lorries using the lane as a shortcut to Tetbury avoiding the more circuitous route via the outskirts of Malmesbury and Filands, and by vehicles supplying Chedglow pig farm and egg farm, and the agricultural base in Chedglow itself. Tetbury Lane does NOT however have a pavement for pedestrians that extends continuously beyond The Street. There are partial pavements, but nothing which connects the juncture of The Dawneys and The Butts and the new development currently under construction at Ridgeway Farm. More to the point there is insufficient roadside verge for such a pavement, and the potential for a young child, elderly resident or indeed any pedestrian to be struck by some of the vehicles progressing along the lane at far higher speed than the designated limit is huge.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2789	Consultee Ms Elizabeth Churchill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134604	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is no current need for a site on this scale within Crudwell. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. I have 3 children all of whom are anxious to buy properties of their own, so I do understand the need to provide more affordable housing, but I feel that the housing being suggested here does not fit with the needs nor the best interests of those people wishing to purchase property locally - without changing the whole aspect of such a sought after village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2790	Consultee Ms Tracey Roberts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134617	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Hi I'd like my view represented in consideration of the plan to add at least 40 houses to the site at tetbury lane, crudwell.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met.</p> <p>I believe that as a large village we need time to asses our local need and the amenties that support this. As the village has an a road going through it additional traffic, footpaths, flood defense, appropriate homes for local people and lack of facilites needs to be considered before the village agrees a plan to support this.</p> <p>Therefore I wouldn't be in favour of the proposed 40 homes as we have not had counsellors in place to discuss.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2791	Consultee Mrs C Long	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446826	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst I can see the need for housing development in the area, especially for affordable housing two things concern me – The effect on Salisbury hospital in having to care for a vastly increased population (including the army personnel being relocated in the area) and the possibility that houses may be built on flood plain areas.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2792	Consultee Mrs I A Lewis	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134607		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As lifelong residents of Salisbury, we strongly oppose the planned housing development at Netherhampton Road. We are very concerned about extra traffic causing additional pollution, increasing the potential flood risk to the city and the impact on the local roads which are already exceeding capacity.</p> <p>We support all the other objection letters about the desperate need of a bypass in order to protect our city for the benefit of future generations. Traffic is literally choking the city and our precious lungs as well. The ring road is constantly full of queues and existing residents have to battle through school, business, freight and holiday traffic to get about their daily lives.</p> <p>The increased housing in Harnham and Rowbarrow has already had a drastic impact on the poor traffic arrangements at Newbridge Road, Harnham Road, Downton Road and Coombe Road which carry a huge amount of traffic through the city. This does not even mention the similar situation occurring at Southampton Road, London Road, Castle Road, Devizes Road and the ever expanding Wilton Road. With all access points into Salisbury clogged, the city simply cannot sustain yet another large housing development.</p> <p>The Salisbury bypass plans involved the use of some of this land at Netherhampton Road – without this, what hope is there that this dreadful situation will ever be improved?</p> <p>We sincerely hope the concerns raised by all those who have responded will be taken seriously and ultimately the right decision will be made.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2793	Consultee Mrs I A Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134607	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As lifelong residents of Salisbury, we strongly oppose the planned housing development at Netherhampton Road. We are very concerned about extra traffic causing additional pollution, increasing the potential flood risk to the city and the impact on the local roads which are already exceeding capacity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2794	Consultee Mrs I A Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134607	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As lifelong residents of Salisbury, we strongly oppose the planned housing development at Netherhampton Road. We are very concerned about extra traffic causing additional pollution, increasing the potential flood risk to the city and the impact on the local roads which are already exceeding capacity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2795	Consultee Mrs I A Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134607	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are losing our beloved green spaces and the character of the city to constant infilling and development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2796	Consultee Mrs I A Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134607	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	City NHS and public facilities are also stretched to the limit.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2797	Consultee Mrs I A Lewis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134607	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Salisbury does not offer sufficient employment for increased residents and many of the larger employers have vacated the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2798	Consultee Mrs P S Uphill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134611		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As lifelong residents of Salisbury, we strongly oppose the planned housing development at Netherhampton Road. We are very concerned about extra traffic causing additional pollution, increasing the potential flood risk to the city and the impact on the local roads which are already exceeding capacity.</p> <p>We support all the other objection letters about the desperate need of a bypass in order to protect our city for the benefit of future generations. Traffic is literally choking the city and our precious lungs as well. The ring road is constantly full of queues and existing residents have to battle through school, business, freight and holiday traffic to get about their daily lives.</p> <p>The increased housing in Harnham and Rowbarrow has already had a drastic impact on the poor traffic arrangements at Newbridge Road, Harnham Road, Downton Road and Coombe Road which carry a huge amount of traffic through the city. This does not even mention the similar situation occurring at Southampton Road, London Road, Castle Road, Devizes Road and the ever expanding Wilton Road. With all access points into Salisbury clogged, the city simply cannot sustain yet another large housing development.</p> <p>The Salisbury bypass plans involved the use of some of this land at Netherhampton Road – without this, what hope is there that this dreadful situation will ever be improved?</p> <p>We sincerely hope the concerns raised by all those who have responded will be taken seriously and ultimately the right decision will be made.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2799	Consultee Mrs P S Uphill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134611	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As lifelong residents of Salisbury, we strongly oppose the planned housing development at Netherhampton Road. We are very concerned about extra traffic causing additional pollution, increasing the potential flood risk to the city and the impact on the local roads which are already exceeding capacity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2800	Consultee Mrs P S Uphill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134611	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are losing our beloved green spaces and the character of the city to constant infilling and development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2801	Consultee Mrs Louise Breen	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134623	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to strongly object to the proposed allocation of an additional forty houses on the Ridgeway Farm site in Crudwell. Crudwell is a small village, the likes of which should be treasured. There are currently 260 houses in the village and a further forty, on top of the ten currently being built, would enlarge the village by twenty percent. I strongly believe that this is substantially out of proportion for the size of the village and its existing infrastructure, and does not consider that the Wiltshire Development Plan forecasts a significant oversupply of housing in the Malmesbury area, of which Crudwell is included.</p> <p>Last year a proposal for an additional twenty nine houses in Crudwell was scaled down. On that basis the decision to approve an additional forty houses in not consistent with recent planning decisions.</p> <p>I sincerely hope that in writing to you, you will take notice of the voices of the parishioners in Crudwell and consider the impact your decision will have on our lives</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2802	Consultee Mrs P S Uphill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134611	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	City NHS and public facilities are also stretched to the limit.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2803	Consultee Mrs P S Uphill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134611	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	As lifelong residents of Salisbury, we strongly oppose the planned housing development at Netherhampton Road. We are very concerned about extra traffic causing additional pollution, increasing the potential flood risk to the city and the impact on the local roads which are already exceeding capacity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2804	Consultee Mrs P S Uphill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134611	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Salisbury does not offer sufficient employment for increased residents and many of the larger employers have vacated the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2805	Consultee Mr and Mrs Kevin and Georgina Bubble	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134632	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Concern has been expressed regarding the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell in the Plan. Together with the 10 dwellings already being built on this site, this represents a near 20% increase in dwellings in the village of Crudwell (currently some 260 dwellings). The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell. A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p> <p>Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy. Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met. Crudwell is not anti-development; it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan. Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development. In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell, it would be right and appropriate that the Crudwell Neighbourhood Planning should determine the scale and location of housing need in Crudwell; having taken full account of parishioners' wishes, and having examined carefully and fully the environmental and infrastructure constraints and options. Crudwell is not anti-development; it acknowledges the need for additional housing, but wishes to have a say in where and how further development of the village should proceed.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2806	Consultee Mr and Mrs Kevin and Georgina Bubble	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134632	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating at maximum capacity. Unless significant investment is made in increasing that drainage capacity, additional housing will only exacerbate the flooding risk for dwellings downstream of this proposed development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2807	Consultee Mr and Mrs Kevin and Georgina Bubble	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134632	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell Primary School is already greatly over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably require the provision of an additional classroom, and unless the main hall is extended, would prevent assembly of the whole school. The site is constrained; lies in a conservation area and additional buildings could be accommodated only at the expense of encroaching into playing fields. The school's ability to expand is not guaranteed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2808	Consultee Mr and Mrs Kevin and Georgina Bubble	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134632	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is significant community concern about safety and the increased traffic flows that will arise on Tetbury Lane, particularly during morning and afternoon school runs, and particularly given the location of the Ridgeway site on Tetbury Lane. The lane is narrow and has only limited and broken stretches of pedestrian pathway down to the A429 main road and to the School and other facilities in the village.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2809	Consultee Ross McLaren Person ID: 1134642	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I have lived in Crudwell for +10 years and have significant concerns over the proposed allocation of an additional 40 dwellings at Ridgeway Farm in Crudwell. These concerns are not raised from a personal (not in my backyard) perspective but genuinely from a belief that the village is simply not suitable or appropriate for such a significant expansion which has not been quantified as necessary.</p> <p>Some specific concerns are as follows:</p> <p>Together with the 10 dwellings already being built on this site, this represents a near 20% increase in dwellings in the village of Crudwell (currently some 260 dwellings).</p> <p>The Plan states that housing sites will only be allocated to Villages where there is a strategic priority to do so however the plan forecasts an oversupply in the Malmesbury Community Area of some 100 houses before any Windfall sites are taken into account. There is no strategic need for a site of this scale in Crudwell.</p> <p>A similar level of oversupply (2,200 houses) is forecast across the wider Housing Market Area (North & West Wiltshire). This again undermines any argument that there is a strategic priority that 40 additional houses are required in Crudwell.</p> <p>Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy.</p> <p>Crudwell has begun the process of producing a Neighbourhood Plan. As part of this, a survey is planned to determine what local needs for housing exist and how they should be met.</p> <p>Crudwell is not anti-development; it would simply wish to plan itself for any growth via the emerging Neighbourhood Plan.</p> <p>Previous proposals for additional housing in Crudwell have led to significant debate about specific issues that affect their sustainability, including the ability of local facilities and services to accommodate increases in the numbers of people and levels of traffic. It is important that any further allocation of sites for more housing should be based on a genuine need and should take into account the legitimate and real concerns felt by the local community (including drainage and flooding, school capacity, road safety and impact on the environment), as well as a full and careful consideration of the options available and any applicable environmental and infrastructure constraints. The Neighbourhood Plan for Crudwell is being developed with these considerations in mind and there should be no unnecessary allocation of one site for a substantial development.</p> <p>In summary, given that there is no substantiated strategic need for further housing allocations in Crudwell and the capability of the current infrastructure to support such a development is not adequate, it would be right and appropriate that the Crudwell Neighbourhood Planning report should be completed (forming part of the on-going housing strategy for Crudwell) before any additional development decisions are taken.</p> <p>I would appreciate if my thoughts and considerations above would be taken into account during the planning and consultation process.</p>				
Attached files (Please see Objective)						

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2810	Consultee Ross McLaren	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134642	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Many houses in Crudwell have experienced severe flooding (on at least 3 occasions in the past 15 years) due to the inability of existing waterways and drains to cope with run-off water following heavy downpours. Surface water systems are already operating, relatively poorly, at maximum capacity.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2811	Consultee Ross McLaren	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134642		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Crudwell Primary School is already greatly over-subscribed, with classrooms and the assembly hall operating at maximum capacity. Forty additional homes will inevitably create additional demand over and above this.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2812	Consultee CLH Pipeline Systems Ltd	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 987736	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Thank you for your email to CLH Pipeline System Ltd dated 4 September 2017 regarding the above. Please find attached a plan of our clients apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to www.linesearchbeforeudig.co.uk our free online enquiry service. [see attached]				
Attached files (Please see Objective)	4734748				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2813	Consultee Miss K Freeman Person ID: 709293	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Warminster			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026. I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons: Positively prepared the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2814	Consultee Miss K Freeman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 709293	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared</p> <p>Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2815	Consultee Miss K Freeman	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 709293	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2816	Consultee Miss K Freeman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 709293		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Effective</p> <p>The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets. For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2817	Consultee Miss K Freeman Person ID: 709293	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to:</p> <p>Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and</p> <p>Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Consistent</p> <p>The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2818	Consultee Mrs carol hill Person ID: 1126309	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include: • Boundary hedgerows / tree lines • Lambrok Stream These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal. Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2819	Consultee Edenstone Homes Person ID: 1134691	Agent Miss Tara Maizonnier Assistant Planner Hunter Page Planning Person ID: 861292	Do you consider the draft WHSAP is legally compliant?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	Yes
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.13 Ridgeway Farm, Crudwell				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation relates to the Site Allocations plan with specific reference to the proposed allocation of site H2.13 - Ridgeway Farm, Crudwell for residential development.</p> <p>The draft Allocation plan identifies a residual requirement for an additional 70 new homes in the Malmesbury Community Area. We agree with the comments made at Paragraph 3.23 – 3.24 of the Council’s Housing Land Supply Topic Paper that there is a requirement to plan for additional growth to maintain supply throughout the plan period in accordance with Para 47 of the National Planning Policy Framework (NPPF). That paragraph states that ‘to boost significantly the supply of housing, local planning authorities should:</p> <p>Identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;</p> <p>Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;</p> <p>For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year land supply of housing land to meet their housing target</p> <p>It is considered that the proposed allocation is consistent with those objectives and the allocation of this site in the Plan will enable the delivery of sustainable development in accordance with the policies of the Framework.</p> <p>We also note that in the February 2017 minutes from the Swindon and Wiltshire Local Enterprise Partnership Joint Strategic Economic Committee refer to the joint Wiltshire and Swindon SHMA. The minutes highlight that the full OAN for housing over the 20-year period 2016-36 is considered to be 73,000 dwellings in Swindon and Wiltshire or 3,650 dwellings per annum. This compares to a level of approximately 3,600 dwellings per annum set out in the authorities adopted Plans. Whilst it is acknowledged that this is yet to be tested at examination through the Plan making process, this OAN indicates that there could be a need for further housing over the plan period than currently identified. As such the identification of sites such as Ridgeway Farm for development in the Malmesbury Community Area will assist in the Council maintaining a 5 year supply of deliverable housing land.</p> <p>Crudwell is identified in the Core Strategy as a Large Village where some development is required to support existing services and facilities, and encourage new services, but to also meet identified local needs for housing including affordable homes, helping the Council achieve its affordable housing target. Based on the Council’s current Affordable Housing Register, we understand that there are currently 61 households on seeking affordable housing in the Malmesbury Community Area and the allocation of this site will therefore go some way to helping to address this need.</p>				

The evidence base supporting the plan demonstrates that the site at Ridgeway Farm is the most sustainable and logical location for new housing to contribute to meeting the identified growth needs of the area. Its inclusion as an allocated housing site for 40 additional dwellings is fully supported by Edenstone Homes.

The Framework states that for sites to be considered 'developable' they should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. To be considered 'deliverable' the Framework requires sites to be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years and, in particular, that development of the site is viable. In respect of the subject site, those tests are addressed as follows:

Available

The site is under the control of Edenstone Homes who have a good track record of delivering quality residential development that is sensitively designed. The site was formerly a farmstead and associated agricultural land; it is no longer in use for agricultural purposes and is therefore available for development now.

The site has been the subject of initial technical appraisals which have identified that there are no significant physical or environmental constraints which would delay or preclude the development of the site.

This is further demonstrated by the current planning permission that is being developed out by Edenstone Homes at the front of the site for 10 dwellings (application reference: 15/03136/OUT). Furthermore, the Council will be aware that prior to permission being granted for 10 units, an outline application was submitted for 19 units (14/07419/OUT), which was later withdrawn.

Pre-application discussions with the Planning Authority's Development Management team have now been instigated for a scheme for a further 40 dwellings; in line with the draft allocation plan.

Suitable

The site is situated on the edge of the large village of Crudwell which is a sustainable location in line with Core Policy 1 of the adopted Wiltshire Core Strategy.

The site does not fall within any landscape or environmental designation and is not within Flood Zones 2 or

3. It is outside of the Crudwell Conservation Area and there are not any listed buildings within the immediate vicinity of the site.

Technical surveys have been carried out which conclude that the site is of limited ecological value; it has no notable landscape features and makes limited contribution to the overall character of the area.

A Heritage Desk based assessment confirms that there are no designated heritage assets within the site and setting of assets within the village would not be adversely affected by the proposals.

Initial highways studies have confirmed that safe and suitable access can be achieved from the site onto the public highway and that the addition of 40 dwellings will not have a significant cumulative impact on the local highway network. In addition, the site is suitably located for development with good accessibility to local services and employment opportunities by sustainable modes of transport. The site is within reasonable walking/cycling distance to the centre of the village and a bus stop is present providing connectivity to Chippenham, Cirencester and Bath and the wider the public transport network.

Initial drainage studies have identified that suitable drainage proposals for the management of both surface water and foul drainage can be adequately provided to support the development and its quantum of 40 dwelling units.

Initial landscape studies have identified that the site relates very well in both landscape and visual terms to the existing settlement, and that the site represents a logical development which should be easily assimilated into this part of the landscape. The site also offers opportunities to provide enhancement to the local hedgerow network and tree stock, including the management of existing features. It also offers a significant opportunity to connect to the adjacent PROW network providing a safe walkable route between the village centre to the east and the village hall to the west. This is in line with the Council's Sustainability Appraisal report which states that "the development of the site would have the potential to appropriately protect and enhance the intrinsic character and scenic beauty of the countryside." This conclusion is supported by the technical work that by the work undertaken by the Environmental Design Partnership.

In light of the above it is evident that the site has no notable development constraints. The site lies adjacent to a large village and existing residential development and is considered wholly suitable for residential development to address housing needs.

Achievable

	<p>The site is unused, in single ownership and is being actively promoted by Edenstone Homes for residential development. There are no legal or ownership issues that would prevent development coming forward on the site.</p> <p>The site represents a viable development which can be delivered quickly. The site is adjacent to existing residential development. Furthermore, as previously noted, part of the site already has permission for the development of 10 dwellings which is currently being built out by Edenstone, further demonstrating the suitability of the site for residential development.</p> <p>It is evident that residential development represents a viable future use for the site which can be delivered quickly. As such, the development of the site can be considered achievable.</p> <p>The above demonstrates that land at Ridgeway Farm, Crudwell, is suitable for residential development as identified by the Council's evidence base. The site does not have any significant development constraints and will help achieve the Government's aim to boost significantly the supply of housing in sustainable locations.</p>
<p>Attached files (Please see Objective)</p>	<p>4734801</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To confirm the status of the development site and land concerned and to reaffirm why Edenstone Homes strongly support the draft allocation of Ridgeway Farm at Crudwell.</p>

Comment ID:	2820	Consultee Edenstone Homes	Agent Miss Tara Maizonnier Assistant Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134691	Hunter Page Planning Person ID: 861292	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Recommendations and conclusion</p> <p>The site is available, suitable and achievable and thus satisfies the requirements of the Framework in terms of it being deliverable. The NPPF at paragraph 47 requires LPA's to boost significantly the supply of housing. It is considered that the proposed allocation is consistent with that objective and the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. However, whilst Edenstone fully support the allocation of the site for 40 dwellings, they have undertaken an initial development appraisal of the land in question. It is considered that, when taking into account the necessary amenities needed to accommodate the development, the proposed boundary for the allocation will not necessarily deliver the number of dwellings that the draft Plan envisages. It is therefore considered that a slight amendment to the boundary within the draft Plan should be made. This amendment will allow the proposed allocation to be consistent with established field boundaries and the existing pattern of development in the Village; will provide a strong boundary of development for the Village and would better reflect the envisaged quantum of development to meet local housing needs.</p> <p>A plan is enclosed [see attached] to show the suggested amendments to the boundary. You will note from the red line plan provided that we consider it sensible to utilise the northern most field boundary which is well established and would act as an appropriate buffer to the site in landscape terms. It is our consideration that if the red line boundary depicted in the draft allocation were to be followed, this would leave an undesirable strip between the development and existing hedgerow boundary to the North.</p>				
Attached files (Please see Objective)	4734801 / 4734797				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To confirm the status of the development site and land concerned and to reaffirm why Edenstone Homes strongly support the draft allocation of Ridgeway Farm at Crudwell.				

Comment ID:	2821	Consultee Anna Lizzio	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134746	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I would like to take this opportunity to let you know how worried we are about the new houses plan. There simply isn't sufficient drainage to with stand more houses being built . My house has flooded before and has been a big village problem which will only get worse if this plan continues . Any future planners and plans for more houses isn't going to be good for the village . It would be good to know what flood prevention is being put on place ? If any? I really don't want the expense of another flood and the distress as well .</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2822	Consultee Terri Murphy Person ID: 1134748	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to express my objections to the proposed development at the above site. The proposed allocation of an additional 40 houses at the site is completely out of proportion to the size of our village, and represents an increase of almost 20% in the the number of dwellings in Crudwell. Furthermore, there is no strategic need for these additional dwellings, as Wiltshire's Plan has forecast an oversupply in the Malmesbury Community Area.</p> <p>It is very important that any future developments are planned with the needs and also restraints of the village taken into account. The Neighbourhood Plan for Crudwell is being developed with these in mind, and should be considered above any county plan. We as a village are not anti-development. We wish to plan any future development with the needs of our community at heart. Real concerns have been expressed by our community that the existing infrastructure will not sustain the proposed development of 40 additional dwellings, including drainage issues, increased traffic, capacity at our local primary school and environmental impact.</p> <p>Therefore it is vital that the Crudwell Neighbourhood Plan should determine any further development, having fully considered the needs and wishes of villagers, and bearing in mind infrastructure and environmental constraints.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2823	Consultee Terri Murphy Person ID: 1134748	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Real concerns have been expressed by our community that the existing infrastructure will not sustain the proposed development of 40 additional dwellings, including drainage issues, increased traffic, capacity at our local primary school and environmental impact. The existing drainage systems are already operating beyond their capacity, and drains and sewers overflow on a regular basis after periods of heavy rain. On these occasions, foul water then runs off into Swill Brook, contaminating this water. Our house, along with 30 others in the village, has been flooded on several occasions, the most severe being in July 2007, when foul water reached levels of 45cm throughout the ground floor. We have been told by more than one Wessex Water engineers that the existing pumping station cannot cope with the existing flow during heavy downpours. Significant investment to increase drainage capacity is vital to ensure that flooding never happens again. Has this investment been included in the planning of this development? if it has not, then the likelihood of further flooding is almost inevitable. Therefore it is vital that the Crudwell Neighbourhood Plan should determine any further development, having fully considered the needs and wishes of villagers, and bearing in mind infrastructure and environmental constraints.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2824	Consultee Candice McCrum Person ID: 1134708	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.12				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Sites Allocation Plan - I am writing to raise my concerns in relation to the above public consultation event. I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village. I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons: Issue: No evidence of housing need for Yatton Keynell Details: Appendix E of the Chippenham Community Area topic paper) confirms that no local housing needs survey was undertaken as part of the plan. The proposed dwellings should be justified with evidence that there is a specific local need. Relevant National Policy in conflict with: paragraph 158 of the NPPF which states: 'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic , social and environmental characteristics and prospects of the area. Strategies for housing and other uses are integrated and they take into account relevant market and economic signals'. Issue: Lack of a Neighbourhood Plan Details: At a Parish Council meeting back in November 2014 there was a call for a Neighbourhood Plan to be made so that residents can engage in how many and where future housing might take place. Relevant National Policy in conflict with: Para 155 of NPPF Issue: Site selection process unsound Details: Sutton Benger has an identified need and no housing has been allocated. Yatton Keynell has no identified need yet 30 houses are proposed Relevant National Policy in conflict with: Para 159 of the NPPF</p>				

Attached files (Please see Objective)	4711546
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2825	Consultee Candice McCrum	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134708		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issue: Infrastructure issues</p> <p>Details: Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area.</p>				
Attached files (Please see Objective)	4711546				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2826	Consultee Candice McCrum	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134708		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issue: Poor consultation</p> <p>Details: None of the Parish Council's from the five villages in the Chippenham Community Area responded to Wiltshire Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement.</p> <p>Relevant National Policy in conflict with: Para 155 of NPPF</p>				
Attached files (Please see Objective)	4525396				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2827	Consultee Candice McCrum	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134708		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Issue: Proposal will have significant impact on the character of the area</p> <p>Details: A large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area. In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)	4711546				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2828	Consultee Hampshire County Council Planning Policy	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Hampshire County Council Person ID: 1134720		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for consulting Hampshire County Council on this matter. The County Council has previously responded to a Duty to Cooperate query on the draft Wiltshire Housing site allocations plan and so I would reiterate those comments At the time the County Council highlighted the importance of two safeguarded mineral and / or waste sites on the Hampshire / Wiltshire border that should be taken into account. For reference, the two sites and relevant details are as follows:</p> <p>Dean Hill MOD site, West Dean This is a waste water treatment work site and there is no reason why this would not continue to function</p> <p>Pound Bottom This previously was within the Hampshire border, but is now a site that sits within Wiltshire. However it comes under the Hampshire Minerals and Waste Plan (HMWP) 2013 because it is within the New Forest National Park. This is an operational non-hazardous landfill site. In 2007, the New Forest National Park granted planning permission for the installation and operation of a leachate storage tank (which was to replace the previous leachate lagoon). New Forest National Park also granted planning permission (in 2007) for the installation and operation of a landfill gas utilisation plant. This permission allows the operation of this function to continue until November 2017.</p> <p>Please also note that safeguarding requires any proposed development to avoid prejudicing the continued use of safeguarded minerals and waste infrastructure. For further information please see the Hampshire Minerals and Waste Safeguarding SPD http://www3.hants.gov.uk/hmwp-spds.htm</p> <p>We have no further comments to make at this time.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2829	Consultee Mrs Sandra Harry Parish Clerk	Agent Person ID:		Do you consider the draft WHSAP is legally compliant?	Yes
		Tisbury Parish Council Person ID: 391632			Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.77					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Grid Refs		TPC Resolution	Comments/justification		
	F3–G4		Support	This reflects new edge of village development of employment units at Wyndhams Place.		
	I8, J8, I9,H9 Station Works site, formerly Parmiter		Support	This parcel of land is a derelict brownfield site which the parish council supports for mixed re-development. It will be allocated in the neighbourhood plan		
	I4, J4, I5, J5		Support	This revision reflects existing development of Duck St and Ladydown View on the north-eastern edge of the settlement but potentially would encourage undesirable infilling along a very narrow single track lane with few passing places. Not in the neighbourhood plan. Narrowness of the lane may make further development unsuitable.		
	I6, J6, K6 The Avenue		Support	The parish council strongly supports the adjustment of the settlement boundary to the northern side of 'The Avenue' , reflecting the existing settlement.		

	H3, H4, I4	Object	Back Garden development along Hindon Lane. The parish council does not support these revisions of the settlement boundary which are not conducive to sustainable development as there is no existing access
	I6 Nadder Close car park	Object	This area is currently in use as the village car park and should remain so. The parish council objects to the movement of the boundary. The site should be transferred permanently to the ownership and control of the parish council.
	K6 The Old Farmyard	Object	This parcel of land is in the flood plain and floods regularly. It is unsuitable for development.
	F4,F5,G4,G5	Object	The parish council objects most strongly to this proposed revision. The proposed new boundary is around the site of St John's school and the former Nadder Middle School. The parish council supports the recommendations of TisPlan, the emerging neighbourhood plan that this site should be reserved only for future potential expansion of educational provision. The site should not be allocated for general development.
	I8 land and gardens around the South Western Hotel	Object	This revised boundary reflects the re-development of the old outbuildings but the gardens flood routinely. They should be excluded from the development boundary.
	H8 G9 F8 G7 E8 D8	Neither support nor object	These revisions reflect the existing settlement, but note comment below re G7
	G7 Knapp Hollow	Object	It should be noted that the gardens of Knapp Hollow extend to the Oddford Brook. The land is unsuitable for any further development.
Attached files (Please see Objective)			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?			

Comment ID:	2830	Consultee Mr Martin Frayling	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1133467		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no Issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.</p> <p>We would like to express our deepest concern, however, about Hannick's proposal to build an extra 20 houses, on the plot of land that is directly In front of our properties. We were informed of Hannick's intentions during a public presentation during which two options were presented to local residents, the details of which I have attached to this letter. We would like to outline our concerns regarding Option 2, with the following points:</p> <ol style="list-style-type: none"> 1) the extra 20 houses will represent an overdevelopment of the village, Intensifying the potential increase in traffic congestion, noise and air pollution and resulting in an increased danger of road traffic accidents; 2) the plot of land containing the proposed extra 20 houses, is an unploughed field that supports a number of species of birds of prey; 3) the proposed housing overlooks the front of our properties, directly compromising our privacy; 4) the owners of 47 Newtown, recently purchased the property on the guarantee that this field would not be built on in the near future; 5) the proposal will create a large public space, within 5 metres of the front of our properties. We have concerns that this could .result in noise pollution (particularly late in the evening). This will have a negative impact on the sleep patterns of young families and older residents who live In the houses adjacent to the proposed development; 6) this area of the village already has excellent links to the wider countryside. There are 4 well developed public footpaths. 7) the original allocation for new housing for the village, presented at the initial public meeting was between 40 and 50. Seventy houses represents a considerable increase on this initial allocation. <p>Thank you for considering our concerns. We ask that you uphold your original decision not to allow the development of an extra 20 houses on the land in front of our properties.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2831	Consultee Mrs Diana Davies	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134739	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2832	Consultee Mrs Diana Davies Person ID: 1134739	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.</p> <p>We would like to express our deepest concern, however, about Hannick's proposal to build an extra 20 houses, on the plot of land that is directly in front of our properties. We were informed of Hannick's intentions during a public presentation during which two options were presented to local residents, the details of which I have attached to this letter. We would like to outline our concerns regarding Option 2, with the following points:</p> <ol style="list-style-type: none"> 1) the extra 20 houses will represent an overdevelopment of the village, intensifying the potential increase in traffic congestion, noise and air pollution and resulting in an increased danger of road traffic accidents; 2) the plot of land containing the proposed extra 20 houses, is an unploughed field that supports a number of species of birds of prey; 3) the proposed housing overlooks the front of our properties, directly compromising our privacy; 4) the owners of 47 Newtown, recently purchased the property on the guarantee that this field would not be built on in the near future; 5) the proposal will create a large public space, within 5 metres of the front of our properties. We have concerns that this could result in noise pollution (particularly late in the evening). This will have a negative impact on the sleep patterns of young families and older residents who live in the houses adjacent to the proposed development; 6) this area of the village already has excellent links to the wider countryside. There are 4 well developed public footpaths. 7) the original allocation for new housing for the village, presented at the initial public meeting was between 40 and 50. Seventy houses represents a considerable increase on this initial allocation. <p>Thank you for considering our concerns. We ask that you uphold your original decision not to allow the development of an extra 20 houses on the land in front of our properties.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2833	Consultee Mr and Mrs M Yeo	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134740	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2834	Consultee Mr and Mrs M Yeo Person ID: 1134740	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.</p> <p>We would like to express our deepest concern, however, about Hannick's proposal to build an extra 20 houses, on the plot of land that is directly in front of our properties. We were informed of Hannick's intentions during a public presentation during which two options were presented to local residents, the details of which I have attached to this letter. We would like to outline our concerns regarding Option 2, with the following points:</p> <ol style="list-style-type: none"> 1) the extra 20 houses will represent an overdevelopment of the village, intensifying the potential increase in traffic congestion, noise and air pollution and resulting in an increased danger of road traffic accidents; 2) the plot of land containing the proposed extra 20 houses, is an unploughed field that supports a number of species of birds of prey; 3) the proposed housing overlooks the front of our properties, directly compromising our privacy; 4) the owners of 47 Newtown, recently purchased the property on the guarantee that this field would not be built on in the near future; 5) the proposal will create a large public space, within 5 metres of the front of our properties. We have concerns that this could result in noise pollution (particularly late in the evening). This will have a negative impact on the sleep patterns of young families and older residents who live in the houses adjacent to the proposed development; 6) this area of the village already has excellent links to the wider countryside. There are 4 well developed public footpaths. 7) the original allocation for new housing for the village, presented at the initial public meeting was between 40 and 50. Seventy houses represents a considerable increase on this initial allocation. <p>Thank you for considering our concerns. We ask that you uphold your original decision not to allow the development of an extra 20 houses on the land in front of our properties.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2835	Consultee Mr Will Caddick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134741	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2836	Consultee Mr Will Caddick	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134741	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no Issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.</p> <p>We would like to express our deepest concern, however, about Hannick's proposal to build an extra 20 houses, on the plot of land that is directly In front of our properties. We were informed of Hannick's intentions during a public presentation during which two options were presented to local residents, the details of which I have attached to this letter. We would like to outline our concerns regarding Option 2, with the following points:</p> <ol style="list-style-type: none"> 1) the extra 20 houses will represent an overdevelopment of the village, Intensifying the potential increase in traffic congestion, noise and air pollution and resulting in an increased danger of road traffic accidents; 2) the plot of land containing the proposed extra 20 houses, is an unploughed field that supports a number of species of birds of prey; 3) the proposed housing overlooks the front of our properties, directly compromising our privacy; 4) the owners of 47 Newtown, recently purchased the property on the guarantee that this field would not be built on in the near future; 5) the proposal will create a large public space, within 5 metres of the front of our properties. We have concerns that this could .result in noise pollution (particularly late in the evening). This will have a negative impact on the sleep patterns of young families and older residents who live In the houses adjacent to the proposed development; 6) this area of the village already has excellent links to the wider countryside. There are 4 well developed public footpaths. 7) the original allocation for new housing for the village, presented at the initial public meeting was between 40 and 50. Seventy houses represents a considerable increase on this initial allocation. <p>Thank you for considering our concerns. We ask that you uphold your original decision not to allow the development of an extra 20 houses on the land in front of our properties.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2837	Consultee Pete and Frances Tracey / Edwards	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134742	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2838	Consultee Pete and Frances Tracey / Edwards	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134742	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are writing to you regarding the proposed development of housing in Hullavington on the land accessible from The Street. We understand that the original decision agreed by the council was to permit the development of 50 houses on the field that is adjacent to Hullavington Primary school. In principle, we have no Issue with this proposal as we understand the need to provide a range of housing to meet the increasing needs of the local area.</p> <p>We would like to express our deepest concern, however, about Hannick's proposal to build an extra 20 houses, on the plot of land that is directly In front of our properties. We were informed of Hannick's intentions during a public presentation during which two options were presented to local residents, the details of which I have attached to this letter. We would like to outline our concerns regarding Option 2, with the following points:</p> <ol style="list-style-type: none"> 1) the extra 20 houses will represent an overdevelopment of the village, Intensifying the potential increase in traffic congestion, noise and air pollution and resulting in an increased danger of road traffic accidents; 2) the plot of land containing the proposed extra 20 houses, is an unploughed field that supports a number of species of birds of prey; 3) the proposed housing overlooks the front of our properties, directly compromising our privacy; 4) the owners of 47 Newtown, recently purchased the property on the guarantee that this field would not be built on in the near future; 5) the proposal will create a large public space, within 5 metres of the front of our properties. We have concerns that this could .result in noise pollution (particularly late in the evening). This will have a negative impact on the sleep patterns of young families and older residents who live In the houses adjacent to the proposed development; 6) this area of the village already has excellent links to the wider countryside. There are 4 well developed public footpaths. 7) the original allocation for new housing for the village, presented at the initial public meeting was between 40 and 50. Seventy houses represents a considerable increase on this initial allocation. <p>Thank you for considering our concerns. We ask that you uphold your original decision not to allow the development of an extra 20 houses on the land in front of our properties.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2839	Consultee Mr Andrew Askins	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1127011		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to state my opposition to the inclusion of site 3565 (fields adjacent to Southwick Court) in the Trowbridge Site Allocation Plan. The field system is a recognisable part of our heritage and dates back hundreds of years in its current form. The land has been used by many generations for its current use of farming and recreational space and is a valuable and valued asset to the local community.</p> <p>Housing on this site would not only contradict government policy of building on brownfield sites in preference to Greenfield, but would cause massive problems in its creation and existence for current residents. Given that much of the building would take place in an area of notified flooding and standing surface water, the existing residents would have their property seriously threatened by an increased risk of flooding.</p> <p>The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed. There is no need to forever lose this valuable space.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2840	Consultee Bloombridge LLP Person ID: 1138316	Agent Mr Thomas Darwall-Smith Maddox Associates Person ID: 1138317	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Wiltshire Draft Housing Site Allocations Plan – Knook MOD Camp, BA12 0JB</p> <p>I write on behalf of our client, Bloombridge LLP, to provide representations in respect of the Wiltshire draft Housing Site Allocations Plan. Our purpose is to highlight the benefits of additional housing delivery at Knook MOD Camp on the A36 near Warminster for housing and other uses. These representations should be read in conjunction with the completed representations pro-forma that accompanies the consultation.</p> <p>Background</p> <p>The site is located in the North and West Wiltshire Housing Market Area. It is approximately 18 Ha and comprises previously developed land as a MOD Transit Training Camp with roads and tarmac surfaces. The current use is being reviewed as part of the MOD long term land strategy and this may release all or part of this site for development. Existing accommodation comprises Military huts, lecture rooms, offices and a large central cookhouse. The site is located approximately 1km east of the village of Heytesbury and approximately 6km south-east of Warminster. The site is bisected by the B390 north-east to Shrewton. The south part of the site lies in the Cranbourne Chase Area of Outstanding Natural Beauty (AONB) and adjacent to the A36. The north part of the site is located outside the AONB.</p> <p>Planning potential</p> <p>The National Planning Policy Framework (NPPF) seeks to boost significantly housing supply (paragraph 47). The Wiltshire Unitary Authority Housing Site Allocations DPD seeks to allocate an additional 2,456 homes on top of the 42,000 allocated in the Core Strategy (adopted 2015) over the plan period in order to ensure a five year supply and buffer. This is a minimum target and Council's are encouraged to deliver more housing than minimum targets.</p> <p>Knook MOD Camp site plan [refer to plan in attached statement]</p> <p>The site has the following attributes that warrants consideration for allocating the site for housing and other uses:</p> <ul style="list-style-type: none"> An opportunity to make an important contribution to housing and affordable housing and can accord with Core Policy 43 (Affordable Homes); Comprises previously developed land; Excellent highway connections to the local infrastructure network being adjacent to the A36, a major trunk route linking Southampton to Trowbridge and Bristol. Development can accord with Core Policy 62 (Transport Network); Other uses might include roadside, commercial or logistics use, given the transport connections; Real opportunity for landscape improvements and protection of the Cranbourne Chase AONB in which part of the site is located. Landscape impacts of development can be mitigated through building design, layout and landscaping measures to ensure development positively assimilates with the wider landscape setting in accordance with Core Policy 51 (Landscape); Impact on ecology managed in accordance with the site comprising previously developed land with low biodiversity value and Core Policy 50 (Biodiversity and Geodiversity); <p>The site is not located in a flood zone and can comply with Core Policy CP 67 (Flood Risk);</p>			

	<p>No impact on heritage assets as the site is not located in a conservation area or within the setting of any listed buildings and can comply with Core Policy 58 (Ensuring Conservation of the Historic Environment); Site has capacity to accommodate its own infrastructure including local services and a primary school and can meet Core Policy 3 (Infrastructure requirements).</p> <p>Alternative development strategies Neighbourhood Plan</p> <p>The consultation document acknowledges that there are some 60 Neighbourhood Plans in preparation in Wiltshire. Core Policy 1 of the adopted Core Strategy is supportive of additional housing coming through the Neighbourhood Plan process. The redevelopment of Knook MOD Camp could bring significant benefits to the nearby Heytesbury with few, if any, impacts. Local consultation and promotion of these benefits to local residents may generate sufficient support for the redevelopment of the camp that it could feasibly come forward for allocation through a Neighbourhood Plan.</p> <p>Permission in principle The Town and Country Planning (Permission in Principle) Order 2017 and the Town and Country Planning (Brownfield Land Register) Regulations 2017 are now in force. The permission in principle consent route is an alternative way of obtaining planning permission which separates the consideration of matters of principle for proposed development from the technical detail of the development. The regulations require Council to have completed their Brownfield Land registers by 31 December 2017.</p> <p>Part 1 of the brownfield register needs to be a comprehensive list of all brownfield sites in a local authority area that are suitable for housing, regardless of their planning status. Much of this information is already collected and reviewed as part of the Strategic Housing Land Availability Assessment process. If the authority considers that permission in principle should be granted for a site the local authority is required to enter that site in Part 2 of their register after they have followed the consultation and publicity requirements. Proposed development would then need to satisfy the technical requirements before development can commence.</p> <p>Policies Map (2015) showing location of Knook MOD Training Camp [refer to map extract in attached statement]</p> <p>Conclusion The site is currently in use as a MOD Training Centre. However, the current use is being reviewed as part of the MOD long term land strategy. The site comprises 18 Ha of previously developed land. The site affords potential for a number of significant benefits outlined in the letter above, and would contribute to the housing delivery in Wiltshire above the minimum level required by government. It would provide an opportunity for increasing the availability of affordable homes for local residents and for roadside commercial or logistics uses.</p>
Attached files (Please see Objective)	4748058
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2841	Consultee James Burke-Murphy Person ID: 1134824	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
Do you consider the draft WHSAP is sound?					
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.13				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to register my opposition to the proposed allocation of an additional 40 houses in Crudwell, on the Ridgeway Farm site as per the Draft Site Allocations Plan.</p> <p>I am also concerned that the site size / boundary of the Ridgeway Farm Development encompasses an area larger than that which was requested and refused planning on, for the same 40 homes back in 2014 - so I question what has changed in the subsequent three years. I strongly believe that the emerging Neighbourhood Plan in consultation with and with full engagement of the local community and businesses should determine the scale and type of housing need in Crudwell. The Neighbourhood Plan would examine how the existing infrastructure can be expanded to accommodate growth - including the drainage and sewerage systems, the local roads which are already very busy - particularly joining the A429 - and the local school, which is at capacity.</p> <p>I strongly believe that the Ridgeway farm site should be removed from the Draft Site Allocations Plan to allow our Neighbourhood Plan to be completed to a stage where it can inform decisions about how and where our village grows. I am not anti-development....I want to ensure my children and grandchildren can live in the village if they choose to. I am however in favour of sensible development with full engagement of the local community.</p> <p>Wiltshire Core Strategy notes that the "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities", in policy 1. Given that the village of Crudwell is about 250 homes as is, I do not see how an additional 40 homes on top of the 10 already being built - a staggering 20% increase overall - even falls within Wiltshire Councils own Core strategy.</p> <p>I objected to the Ridgeway Farm planning application for these houses back in 2014 on the basis that that scale of the development at that one site in the village is unsustainable:</p> <ul style="list-style-type: none"> • The scale of the development was much larger than previous developments. • This development would not be 'in-fill'. • Crudwell Primary School is oversubscribed and already at capacity. • It is outside the red line settlement boundary and not even adjacent to it. <p>I, along with many other villagers and parishioners, was in favour of the 10 houses which were finally agreed. I was shocked when I heard about this re allocation for 40 additional houses appeared on this site which was previously considered unsuitable.</p> <p>There is no immediate need or justification to allocate new homes to Crudwell and the Draft Site Allocations Plan should not do so.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	2842	Consultee James Burke-Murphy	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134824		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> • It would create a pinch point on the very narrow Tetbury lane for traffic • Increased traffic on Tetbury lane would be a danger to the many pre-school and primary school children who walk that lane daily. • the connections to any amenity services are non existent - with bus services only being 3X a day each way and without the use of a private car or (for those wishing to take there life in their hands) bicycle it is impossible to get about. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2843	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>OBJECTION re: Greenfield Destruction Church Lane Site 1021 - Draft Wiltshire Housing Site Allocations Plan</p> <p>Wiltshire Council plans to decimate Trowbridge green fields</p> <p>Wiltshire's Jewel in the Crown is its unique and beautiful rural landscape. People across Wiltshire should rise up and object to Wiltshire Council's irresponsible plans to develop our green fields when there are plenty of perfectly good brown field sites available.</p> <p>Wiltshire Council sprung its previously hushed plans for development within the Church lane/Southwick green belt at a Cabinet meeting on 20th June, including a 10-week public consultation to take place through the summer holidays when many people are away and busy doing other things. A tranquil green field like the one at Church Lane should not even be on the agenda for development.</p> <p>We should keep the diggers out of our remaining green and pleasant fringes on the edge of the Trowbridge boundaries which are home to our wildlife, and halt the urban sprawl into our lovely Wiltshire countryside.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2844	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This idyllic strip of land, inhabited now by horses, deer, squirrels and many other forms of wildlife is one of the last rural enclaves in Trowbridge.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2845	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Both the historic setting of the 19th century church of St John the Evangelist and the views north from Southwick Country Park will be irrevocably blighted if a collection of 21stcentury housing is dumped on Church Lane.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2846	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council's Core Strategy for 2006-26 includes a number of strategic commitments and priorities for Trowbridge which are directly contradicted by the proposal for housing development at Church Lane.</p> <p>'Further significant house building on Greenfield sites, will only be able to commence if adequate education infrastructure exists, such as delivered on the Ashton Park extension.'</p> <p>The Ashton Park extension has been delayed, seemingly indefinitely due to complications with bats, and apparently cannot now be delivered by 2026. This means the education infrastructure planned as part of the development will not be delivered, and to quote the Core Strategy other Greenfield development should not therefore be pushed forward at this time.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2847	Consultee James Burke-Murphy	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134824	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> It would compound the drainage and sewerage problems in the area with knock on to the rest of crudwell's systems as they are already overburdened, as this is a much needed soak away area protecting parts of the village from worse and more regular flooding. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2848	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>'It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities.'</p> <p>The proposed development site sits immediately next to the Southwick Country Park and Nature Centre, is a part of the current green buffer between Trowbridge and Southwick, and has flooding issues.</p> <p>I was sent a letter by Dr Andrew Murrison MP dated 21st July. It was very succinct and said, "Dear Mr Wylie. Thank you for your letter. I agree with you. It is unacceptable that the green zone between towns and villages should be erased and I am making representations accordingly." (I will happily provide a copy of this letter if required.)</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2849	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>'Town centre growth should be a priority with Greenfield development being phased.'</p> <p>Digging up some of the last remaining green fields at the most distant fringes of the 2km town boundary and taking away forever those last remaining peaceful rural enclaves is environmentally irresponsible, will do little to tackle Trowbridge's decaying town centre, and does not accord with Wiltshire Council's Core Strategy.</p> <p>The Trowbridge Town Council Strategy 2013-17 states - 'Trowbridge Town Council will continue to support growth in areas closest to the town centre, recognising that significant areas of Greenfield development have now been allocated 300 or more houses per year to the East and South East.'</p> <p>Despite the above very public commitments by our local councils one reason why Greenfield sites on the outskirts of Trowbridge are now being considered is because many of those large, derelict brownfield spaces in the town centre have been excluded from Wiltshire Council's list of housing options as the Council has classified these as 'windfall' sites.</p> <p>I daresay Wiltshire Council would argue that they are holding onto potentially valuable Trowbridge town centre plots until the market is 'right', for reasons of Best Value and financial responsibility tosh. But really, is it morally right to sit on these Brownfield plots for years, or even decades whilst irreversibly pillaging our green rural countryside and destroying natural habitat?</p> <p>The presence of such prominent brown field sites standing derelict in the centre of Trowbridge is hardly the way to inspire local residents, businesses and visitors to want to live or invest in our town. Such sites visibly fester, like sores upon the landscape – as carbuncles even! The Campaign to Protect Rural England (CPRE) has expressed strong objection to councils which go against local and national government policy by developing in Greenfield locations. The CPRE states, 'The Conservative manifesto pledged to maintain the existing strong protections on designated land like the green belt. However, development on that land can be permitted under 'exceptional circumstances'. One wonders what exceptional circumstances exist to justify building on the green fields at Church Lane?</p> <p>The CPRE goes on to say the Government is offering councils financial incentives to plan for more housing under its New Homes Bonus Scheme. This may be getting us nearer to the truth – that it's all about money.</p> <p>A spokesman for the Department for Communities and Local Government said, 'This government is committed to protect the green belt. We have been clear that councils must prioritise development on Brownfield land, and announced plans to radically boost Brownfield development. So, is a Conservative Wiltshire Council going to defy Conservative central government policy by building houses on green fields in Wiltshire instead of prioritising Brownfield development?</p> <p>The Wiltshire Times published an article on Friday 4th August 2017 (page 4) highlighting the travesty of building on green fields at the extremes of Trowbridge whilst brown field sites in the town centre lie decaying and undeveloped, and increasing numbers of town centre businesses close.</p>				

	<p>On 17th July I requested via Cllr David Halik that Wiltshire Council provide me with a list of the identified Windfall sites in the North & West Housing Market Area, identifying for each site the area (hectares) and whether each one is a greenfield or brownfield site to help inform my response to the WHSAP consultation. Cllr Halik replied to me on 19th July 2017 saying, 'Awaiting of Wiltshire planning offices for detailed figures hope to get back to you by end of next week'. The information has never been provided by Wiltshire Council – just one of a number of obstructions by Wiltshire Council to the consultation process.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2850	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>When Wiltshire Council held its Cabinet meeting on 20th June Wiltshire Councillor Graham Payne (Conservative) said, ‘Someone said to me that Trowbridge is becoming like a doughnut, there is nothing in the middle.’</p> <p>So, I have carried out my own audit of Trowbridge Town Centre and found: Of the 7 prestigious and large retail units on Bythesea Road only 5 are occupied. This means currently a 28.6% vacancy level of these key retail units.</p> <p>Castle Place Shopping Centre on Market Street has 2 levels. The lower level looks relatively shabby and has a fair amount of unused floor space. The ground floor level has only 9 of the 16 units currently occupied – a shocking 43.8% vacancy level. Even JD Wetherspoons closed down and moved out in recent weeks. It seems a dreadful indictment for a town not to even be able to generate enough trade to maintain a Wetherspoons pub.</p> <p>The town’s major shopping centre, The Shires fares slightly better, in part because the vacant units that exist are better camouflaged with bright pictures, in contrast to the sadly empty units in full view in Castle Place. I counted 9 vacant units out of 52 in the Shires, a 17.3% vacancy level, which of course represents further loss of investment and business and retail opportunity in Trowbridge’s main shopping mall.</p> <p>Numerous other local independent traders have gone out of business in recent years many of which still stand empty including QS Extra, Walter Rose the butcher, Aston Interiors, Betterlife, The Carpenters Arms, and HB Pitt Ltd Gifts which had to close in 2016 due to lack of business after having traded in Trowbridge for 116 years.</p> <p>Instead we should get on and regenerate that gaping big hole in the centre of the Trowbridge ring doughnut.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2851	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Yes, the country needs more housing – mostly 1 and 2 bed affordable units to enable first-time buyers to get onto the housing market, and for some older people to downsize. Such housing is best located in town centres for easy access to the shops, leisure facilities and transport links. Ripping up our green fields to build ‘country piles’ each costing £½million does nothing to meet the real housing need. Of course, building affordable homes in the town centre doesn’t make the developers so much profit. But Toby Sturgess (Wiltshire Council’s Cabinet Member for Spatial Planning) said at the June Cabinet meeting that Wiltshire’s planning process is not developer-led. And pigs can fly!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2852	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>At the Trowbridge Town Council P&R Committee meeting on 5th September 2017 Wiltshire Council's proposed housing development sites were discussed. At the meeting the Town Council identified a number of other potential development sites which in the Council's view would be preferable and less detrimental to the environment and rural landscape to those in the Wiltshire Council HSAP as follows:</p> <p>Site / No of units 256 South of Green Lane / 167-272 292 North of Green Lane / 170-250 3247 West Ashton Road / 210-300</p> <p>The same meeting also identified the following brownfield 'Windfall' sites which have also been excluded from Wiltshire Council's housing allocation numbers and which should be developed in preference to any greenfield locations.</p> <p>Former District Council Offices, Bradley Road / 70 East Wing/Trowbridge Hospital/Margaret Stancomb School / 300 Bowyers / 250 Virgin Site / ? Ashton Street Centre / ?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2853	Consultee James Burke-Murphy	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134824		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> the nearest shops and cafes capable of dealing with a family's needs are in Malmesbury, Tetbury, or Cirencester. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2854	Consultee James Burke-Murphy	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134824	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> the field that is being put forward for development is just that, a green field and as recently as this year still had farmers working it. There is no immediate need or justification to allocate new homes to Crudwell and the Draft Site Allocations Plan should not do so. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2855	Consultee Peter and Helen Williams	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134910	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We're writing this email to express our concerns regarding the recent proposed allocation of an additional 40 dwellings at Ridgeway Farm, Crudwell.</p> <p>We've recently moved into Crudwell - part of the attraction for us was the fact that Crudwell is a small, attractive village on the edge of the Cotswolds with green space around us.</p> <p>With this proposal for another 40 dwellings, this represents nearly a 20% increase in the number of houses in this small village (currently 260 we believe).</p> <p>We're not against development of rural communities at all but equally we believe any development has to be right for the village and in proportion. These additional 40 dwellings we believe are not right for the village nor are they in proportion.</p> <p>We understand from attending a recent meeting in the village, that there is no strategic need for a site of this scale in Crudwell. We believe the developers have identified a 'gap' in that Crudwell does not have a neighbourhood plan in place at this point in time and have taken advantage of this situation. A neighbourhood plan is now being produced and as part of this a planned survey will determine what the local needs for housing are and how they should be met.</p> <p>It is important that any allocation of sites for more housing must be on a genuine need rather than greed. They must take into account legitimate and real concerns felt by the local community ie drainage and flooding, school capacity, road safety and the impact on the environment - sadly our green spaces are declining at an alarming rate and everything that's associated with that.</p> <p>The school, which we understand to be a very good school, will be stretched way beyond its capacity - the school does not have the ability to extend - it's in a conservation area - unless of course that can conveniently be overlooked (but that's another issue!).</p> <p>As we've already said were not anti-development - we personally believe, however, that this proposal (increasing the number of houses in the village by almost 20%) is not in the best interests of the village, there is no strategic need for this number of new dwellings and we believe the developer has taken advantage of the fact that a neighbourhood plan has not been put in place. The residents of Crudwell deserve the right to have a say in how the village develops in line with housing needs.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2856	Consultee Peter and Helen Williams	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134910	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Flooding has been a major issue for many houses/residents in Crudwell over the last few years. The existing waterways and drains have at times been unable to cope with run off water after heavy rains. Additional housing, where foundations are replacing open land will only make this problem worse for other residents.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2857	Consultee Peter and Helen Williams	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1134910	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Traffic in Crudwell can be an issue at times anyway without the additional traffic these proposed dwellings will bring. Tetbury Lane is quite narrow, with very basic and infrequent pavement along the lane. I have walked with my grandchildren to the play area by the village hall on a few occasions and have had to ask/ gesticulate to drivers to slow down. I wouldn't allow an older child to cycle along Tetbury Lane to the playing fields with the traffic as it is now, never mind with all the additional traffic associated with 40 more dwellings.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2858	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>OBJECTION re: Policy Breach considerations Church Lane Site 1021 - Draft Wiltshire Housing Site Allocations Plan Trowbridge Town Centre Regeneration</p> <p>A tranquil green field like this one at Church Lane should not even be on the agenda for development. The Lambrok Stream runs along the bottom edge of the field and the marks the line of the Trowbridge town boundary – 2km from the town centre. This field is therefore at the most distant corner possible from the town centre. To consider a housing development at this location flies in the face of Wiltshire Council policy, Trowbridge Town Council priorities, and common sense.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2859	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>This idyllic strip of land, inhabited now by horses, deer, squirrels and many other forms of wildlife is one of the last rural enclaves in Trowbridge. Doubtless the local bats will be driven further away, and the nightingale that sings so beautifully at dusk in the trees at St John's will be banished from this place.</p> <p>Para 5.147 bullet point 15 (page 133) 'All developments in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding.'</p> <p>The proposal to develop at Church Lane fails to comply with the above requirements on all counts. The proposed development site sits immediately next to the Southwick Country Park and Nature Centre, is a part of the current green buffer between Trowbridge and Southwick, and the site has flooding issues.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2860	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126922		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is overlooked by the old bell tower of the 19th century church of St John the Evangelist, and a cluster of six Listed Buildings all of which form an historic and typically rural Wiltshire view north from the adjacent Southwick Country Park.</p> <p>Both the historic setting of the St John's enclave and the view north from Southwick Country Park will be irrevocably blighted if a collection of 21st century housing is dumped here on Church Lane.</p> <p>In addition to this the Wiltshire Local Development Framework states: "the preferred option comprises a collection of sites that could deliver a coherent sustainable urban extension to the South East of Trowbridge and a town centre strategic site"</p> <p>There are clear contradictions to these statements in the core strategy as follows: The strategy does not identify and offer protection to all listed buildings and has not offered protection to area of historical significance</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2861	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
Do you consider the draft WHSAP is sound?					
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council's Core Strategy for 2006-26 (adopted in January 2015) includes a number of strategic commitments and priorities for Trowbridge which are directly contradicted by the proposal for housing development at Church Lane. Para 5.146 (page 131) 'Further significant house building on Greenfield sites, will only be able to commence if adequate education infrastructure exists, such as delivered on the Ashton Park extension.'</p> <p>The Ashton Park extension has been delayed, seemingly indefinitely due to complications with bats, and apparently cannot now be delivered by 2026. This means the education infrastructure planned as part of the development will not be delivered, and to quote the Core Strategy other Greenfield development should not therefore be pushed forward at this time.</p> <p>Contradictions in the Wiltshire Council Strategy A core strategy or local plan is considered "sound" when it is consistent with national policy. The National Planning Framework and Planning Guidance documents clearly state that 72 - The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: give great weight to the need to create, expand or alter schools; and work with schools promoters to identify and resolve key planning issues before applications are submitted. In addition to this the Wiltshire Local Development Framework states: "the preferred option comprises a collection of sites that could deliver a coherent sustainable urban extension to the South East of Trowbridge and a town centre strategic site" There are clear contradictions to these statements in the core strategy as follows: The plan is for some 6,000 new homes for the Trowbridge area. Ashton Park has 2,000 already built and the plan was for a further 2,600 to be built there by 2026, leaving just 1,400 more to be identified. However there has been a two year delay re: the Ashton Park site due to the debate over the bats in the woods meaning the remaining 2,600 houses there cannot be built by the 2026 deadline, The sites named in the core strategy are not big enough to allow for increases in infrastructure (schools and healthcare). This can ONLY be provided by including the West Ashton Site which would not only provide infrastructure but already has a new road and would fulfil all the need for 900 new houses.</p>				

	The Core strategy has clearly been written with developers, not the local communities in mind and it would appear that the council has opted for the smaller “developer friendly” sites in which developers are not required to provide social housing and infrastructure as opposed to one larger site which could clearly provide the needs of the whole of Trowbridge.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2862	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Para 5.147 bullet point 6 (page 132) 'It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities.'</p> <p>The proposal to develop at Church Lane fails to comply with the above requirements on all counts. The proposed development site sits immediately next to the Southwick Country Park and Nature Centre, is a part of the current green buffer between Trowbridge and Southwick, and the site has flooding issues.</p> <p>Para 5.147 bullet point 2 (page 131) 'Town centre growth should be a priority with Greenfield development being phased.'</p> <p>Para 5.147 bullet point 7 (page 132) 'The regeneration of Trowbridge central area is a priority...'</p> <p>'The regeneration of centrally located vacant sites will improve the services and facilities the town needs.'</p> <p>What Trowbridge needs is development of the significant number of large, prominent, vacant and derelict sites in the town centre. New affordable housing to increase the number of people living in the town centre right in amongst our shops, cinema, cafes and restaurants, library etc, and within walking distance of the railway station is how you regenerate the town centre and its businesses.</p> <p>Digging up some of the last remaining green fields at the most distant fringes of the 2km town boundary and taking away forever those last remaining peaceful rural enclaves is environmentally irresponsible, will do little to tackle Trowbridge's decaying town centre, nor does it accord with Wiltshire Council's Core Strategy.</p> <p>The Trowbridge Town Council Strategy 2013-17 sets out commitments from the Town Council regarding development priorities in Trowbridge. In section 1.2 Future Growth it states, 'Trowbridge Town Council will continue to support growth in areas closest to the town centre, recognising that significant areas of Greenfield development have now been allocated 300 or more houses per year to the East and South East.' The document also acknowledges the work done by the 'Campaign for a Better Trowbridge' group calling for the need to ensure brownfield sites in the town centre are developed first.</p> <p>Despite the above very public commitments by our local councils one reason why Greenfield sites on the outskirts of Trowbridge are now being considered is because many of those large, derelict brownfield spaces in the town centre have been excluded from Wiltshire Council's list of housing options as Wiltshire Council has classified these as 'windfall' sites. I understand that windfall sites are defined as those that become suddenly and unexpectedly available and which therefore cannot be factored into long-term development planning. However, many of these town centre brownfield locations like the Bowyers site, the old library site on Bythesea Road and numerous others have been vacant for years, and indeed Wiltshire Council itself owns many of them. So it is very hard to see how they can be legitimately classified as windfall sites.</p> <p>I daresay Wiltshire Council would argue that they are holding onto potentially valuable Trowbridge town centre plots until the market is 'right', for reasons of Best Value and financial responsibility tosh. But really, is it morally right to sit on these Brownfield plots for years, or even decades whilst irreversibly pillaging our green rural countryside and destroying natural habitat?</p>				

The presence of such prominent brown field sites standing derelict in the centre of Trowbridge is hardly the way to inspire local residents, businesses and visitors to want to live or invest in our town. Such sites visibly fester, like sores upon the landscape – as carbuncles even! In an article in The Times Newspaper (3rd July 2017) the Campaign to Protect Rural England (CPRE) expressed strong objection to some councils going against local and national government policy by developing in Greenfield locations. The article said, ‘The Conservative manifesto pledged to maintain the existing strong protections on designated land like the green belt. However, development on that land can be permitted under ‘exceptional circumstances’. One wonders what exceptional circumstances exist to justify building on the green field at Church Lane? The article went on to say the Government is offering councils financial incentives to plan for more housing under its New Homes Bonus Scheme. This may be getting us nearer to the truth – that it’s all about money.

Tom Fynans, Director of Campaigns and Policy at CPRE says, ‘We must not be the generation that sells off our precious green belt in the mistaken belief it will help improve the affordability of housing. The only ones set to benefit from future green-belt development will be landowners and the big house builders, not communities in need of decent, affordable housing. Protecting the green belt is part of, not a barrier to, solving the housing crisis. It encourages us to focus on the million-plus homes we can build on suitable brown field sites, and avoid the environmental costs of urban sprawl. The green belt makes our towns and cities better places to live. It provides quick access to the countryside. The government must do more to protect it.’

A spokesman for the Department for Communities and Local Government said, ‘This government is committed to protect the green belt. We have been clear that councils must prioritise development on Brownfield land, and announced plans to radically boost Brownfield development. So, is a Conservative Wiltshire Council going to defy Conservative central government policy by building houses on green fields in Wiltshire instead of prioritising Brownfield development?

Contradictions in the Wiltshire Council Strategy

A core strategy or local plan is considered “sound” when it is consistent with national policy.

The National Planning Framework and Planning Guidance documents clearly state that 111 - Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

In addition to this the Wiltshire Local Development Framework states:

“the preferred option comprises a collection of sites that could deliver a coherent sustainable urban extension to the South East of Trowbridge and a town centre strategic site”

There are clear contradictions to these statements in the core strategy as follows:

That potential (windfall) housing on Brownfield sites including Bowyers, the old library site on Bythesea Road and many others have not been included in Wiltshire Council’s housing allocations, which if they were we would not need the proposed new Greenfield sites;

A further 82 homes are going to pre-application on Bradley Road (West Wilts site). Have these been included in the allocation or are they simply seen as windfall sites.

Also several sites were ruled out during the SHLAA process, the reason given being that they were inside the existing town boundary. These should surely be counted as sites and developed BEFORE open countryside is touched.

The lack of inclusion in developing the Bowyers site as part of the planned housing in Trowbridge does not comply with National Planning Policy 111 above.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2863	Consultee Steve Wylie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Para 5.147 bullet point 15 (page 133) 'All developments in Trowbridge should be sensitive to constraints, such as the local County Wildlife Sites, SSSIs, Ancient Woodland, the Western Wiltshire Greenbelt and areas at risk of flooding.'</p> <p>The proposal to develop at Church Lane fails to comply with the above requirements on all counts. The proposed development site sits immediately next to the Southwick Country Park and Nature Centre, is a part of the current green buffer between Trowbridge and Southwick, and the site has flooding issues.</p>			
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Comment ID:	2864	Consultee Steve Wylie	Agent	Do you consider the draft WHSAP is legally compliant?	
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Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Contradictions in the Wiltshire Council Strategy A core strategy or local plan is considered “sound” when it is consistent with national policy. The National Planning Framework and Planning Guidance documents clearly state that 155 - Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p>				
Attached files (Please see Objective)					
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Comment ID:	2865	Consultee Steve Wylie Person ID: 1126922	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
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Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Contradictions in the Wiltshire Council Strategy A core strategy or local plan is considered “sound” when it is consistent with national policy. The National Planning Framework and Planning Guidance documents clearly state that 156 - Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); the provision of health, security, community and cultural infrastructure and other local facilities; and climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape. 157 - Crucially, Local Plans should: plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework; be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date; identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation; identify land where development would be inappropriate, for instance because of its environmental or historic significance; and contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.</p>				
Attached files (Please see Objective)					
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In addition to this the Wiltshire Local Development Framework states: “the preferred option comprises a collection of sites that could deliver a coherent sustainable urban extension to the South East of Trowbridge and a town centre strategic site” There are clear contradictions to these statements in the core strategy as follows: Contention that other towns (Melksham and Westbury) are better able, and indeed in the case of Melksham possibly keen to take more housing development, and that such alternative locations should be considered in preference to yet more Trowbridge development;</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2867	Consultee Mr and Mrs Simon and Rose Stocker Person ID: 1135059	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7, H2.8, H2.9			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re: PLANNING APPLICATIONS FOR HOME FARM (16/10502/OUT) and SPURT MEAD, BISHOPSTROW, WARMINSTER.</p> <ol style="list-style-type: none"> 1. The above applications are for housing development, on agricultural and green field sites. Areas such as these need our full protection, not only for wildlife and the well being of the local people, but also for the future production of our food. 2. The villagers of Bishopstrow made no objection to the development of the former Beeline bus depot, because it was a brownfield site, and therefore had the necessary infrastructure of drains, water, electricity. However, the problem with that development, is now becoming apparent, i.e. not enough car parking spaces which is leading to people parking on the narrow main road within a short distance of a roundabout causing considerable traffic congestion; this is especially evident at school run times. 3. With regard to the SPURT MEAD application, it is right on the roundabout (mentioned in para 2) at the junction of Bishopstrow Road and Boreham Road - both of which are narrow and busy. If planning permission is granted it must be stipulated that there is to be no parking on the public roads. However, it will be tragic to see houses and cars (with their run-off) right beside the river Wylye which runs along the side of the proposed development. The NRA and local people have put great energy into keeping the river clean, and to nurturing wild life i.e. water voles and kingfishers. What is the point of our nature charities putting so much effort into the countryside when developers can wipe it out instantly? 4. With regard to HOME FARM, which we understand has had several previous bids for development rejected, because it is agricultural land and should be sacrosanct. 5. It is time the developers were made to build LOW-RISE FLATS in which six families can be housed on the footprint of two or three detached houses (3 floors: two flats coming off central staircase on each floor), and which are more affordable for the buyers. The Europeans build flats as a matter of course and one only needs go as far as Belgium, France, Holland and Germany to see plenty of fine examples. The added benefit of flats is that the reception rooms can be more spacious for families, rather than the cruelly tiny boxes that we make them buy at the moment. 6. As I understand it, the Warminster area currently has enough housing to meet the targets until 2026. If more housing is needed why is the council not insisting on developers building on brown-field sites in the Warminster area. There are several, unused and/or neglected, such as the old police station in Station road, and a former old people's home, "Woodmead", on Portway. Our town centres need to be brought back to life. 7. Clearly there is a money element in all this. We suspect that developers prefer Greenfield sites, as they are easier to build on, and they will make more profit. Surely it is the duty of our local council to respect the wishes of the people they represent, before giving in to rich developers, who only think of themselves and their profits. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	2868	Consultee Mr and Mrs Simon and Rose Stocker	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135059	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re: PLANNING APPLICATIONS FOR HOME FARM (16/10502/OUT)</p> <p>The above applications are for housing development, on agricultural and green field sites. Areas such as these need our full protection, not only for wildlife and the well being of the local people, but also for the future production of our food.</p> <p>With regard to HOME FARM, which we understand has had several previous bids for development rejected, because it is agricultural land and should be sacrosanct.</p> <p>It is time the developers were made to build LOW-RISE FLATS in which six families can be housed on the footprint of two or three detached houses (3 floors: two flats coming off central staircase on each floor), and which are more affordable for the buyers. The Europeans build flats as a matter of course and one only needs go as far as Belgium, France, Holland and Germany to see plenty of fine examples. The added benefit of flats is that the reception rooms can be more spacious for families, rather than the cruelly tiny boxes that we make them buy at the moment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2869	Consultee Mr and Mrs Simon and Rose Stocker	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135059	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.9			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Re: PLANNING APPLICATIONS FOR SPURT MEAD, BISHOPSTROW, WARMINSTER.</p> <p>The above applications are for housing development, on agricultural and green field sites. Areas such as these need our full protection, not only for wildlife and the well being of the local people, but also for the future production of our food.</p> <p>With regard to the SPURT MEAD application, it is right on the roundabout (mentioned in para 2) at the junction of Bishopstrow Road and Boreham Road - both of which are narrow and busy. If planning permission is granted it must be stipulated that there is to be no parking on the public roads. However, it will be tragic to see houses and cars (with their run-off) right beside the river Wylye which runs along the side of the proposed development. The NRA and local people have put great energy into keeping the river clean, and to nurturing wild life i.e. water voles and kingfishers. What is the point of our nature charities putting so much effort into the countryside when developers can wipe it out instantly? It is time the developers were made to build LOW-RISE FLATS in which six families can be housed on the footprint of two or three detached houses (3 floors: two flats coming off central staircase on each floor), and which are more affordable for the buyers. The Europeans build flats as a matter of course and one only needs go as far as Belgium, France, Holland and Germany to see plenty of fine examples. The added benefit of flats is that the reception rooms can be more spacious for families, rather than the cruelly tiny boxes that we make them buy at the moment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2870	Consultee Mrs Bev Cornish Clerk and RFO	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Downton Parish Council Person ID: 467669		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.62 - 4.72		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We also believe the Plan is unsound on the grounds of not being effective. The proposal is to plan for the remaining 850 homes allocated to Southern Wiltshire in just two areas with 750 of these to be built in one area. We believe that this proposal will encounter objection and consequent delay or possible abandonment of some of the proposed development as a result. With a proposal for Churchfields to become residential we believe that, despite the stated consultation and cooperation of various organisations on strategic issues such as transport and environment impact (cited at item 1.12 of the draft Plan), there is insufficient detail about how the impact on traffic and accessibility will be mitigated.</p> <p>We also consider that there is a lack of information about how the infrastructure will be provided to meet the needs of future residents living in the 850 homes and where those people will find employment – Salisbury has low unemployment figures. It is therefore quite possible that future residents will need to travel outside of Salisbury to the South for employment in Bournemouth and Ringwood, using the already congested A338. The lack of detail about impact on other community areas indicates either that the implications have been insufficiently thought through or inadequately explained. Either of these reasons means that too much is unknown and there is deficient foundation for true consultation and the draft Plan is therefore not 'effective'. Furthermore there is mention in the methodology nor obvious reference to registered conservation areas. Given a presumption in favour of development within settlement boundaries and the importance of sustainability criteria, we would wish to see evidence that that conservation areas have relevance and been taken into account.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to represent the views of the Parish Council.				

Comment ID:	2871	Consultee Mrs Bev Cornish Clerk and RFO	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Downton Parish Council Person ID: 467669		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.2, H3.3, H3.4, H3.5, H3.6		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We also believe the Plan is unsound on the grounds of not being effective. The proposal is to plan for the remaining 850 homes allocated to Southern Wiltshire in just two areas with 750 of these to be built in one area. We believe that this proposal will encounter objection and consequent delay or possible abandonment of some of the proposed development as a result. With a proposal for Churchfields to become residential we believe that, despite the stated consultation and cooperation of various organisations on strategic issues such as transport and environment impact (cited at item 1.12 of the draft Plan), there is insufficient detail about how the impact on traffic and accessibility will be mitigated.</p> <p>We also consider that there is a lack of information about how the infrastructure will be provided to meet the needs of future residents living in the 850 homes and where those people will find employment – Salisbury has low unemployment figures. It is therefore quite possible that future residents will need to travel outside of Salisbury to the South for employment in Bournemouth and Ringwood, using the already congested A338. The lack of detail about impact on other community areas indicates either that the implications have been insufficiently thought through or inadequately explained. Either of these reasons means that too much is unknown and there is deficient foundation for true consultation and the draft Plan is therefore not 'effective'.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		In order to represent the views of the Parish Council.			

Comment ID:	2872	Consultee Mrs Bev Cornish Clerk and RFO	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Downton Parish Council Person ID: 467669		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.2, H3.3, H3.4, H3.5, H3.6		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We also consider that there is a lack of information about how the infrastructure will be provided to meet the needs of future residents living in the 850 homes and where those people will find employment – Salisbury has low unemployment figures. It is therefore quite possible that future residents will need to travel outside of Salisbury to the South for employment in Bournemouth and Ringwood, using the already congested A338. The lack of detail about impact on other community areas indicates either that the implications have been insufficiently thought through or inadequately explained. Either of these reasons means that too much is unknown and there is deficient foundation for true consultation and the draft Plan is therefore not 'effective'.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to represent the views of the Parish Council.				

Comment ID:	2873	Consultee Mrs Bev Cornish Clerk and RFO	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Downton Parish Council Person ID: 467669		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1, H3.2, H3.3, H3.4, H3.5, H3.6		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Furthermore there is mention in the methodology nor obvious reference to registered conservation areas. Given a presumption in favour of development within settlement boundaries and the importance of sustainability criteria, we would wish to see evidence that that conservation areas have relevance and been taken into account.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to represent the views of the Parish Council.				

Comment ID:	2874	Consultee Mrs Bev Cornish Clerk and RFO	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Downton Parish Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.94			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Downton Parish Council considers that the Wiltshire Site Allocations Plan is unsound because it is not positively prepared. We believe that it is inaccurate in that the settlement boundary shown for Downton does not show the extended boundary that should exist for the 99 houses already being built by Persimmon for Charles Church in grid reference F4 and G4. We believe that, as this development was granted full planning permission with the decision notice dated 1st June 2016 under 14/065161/FUL and is already being built with some houses already sold, this should be included in the Revised Settlement Boundary for Downton.</p> <p>We also note that the settlement boundary has been revised to exclude recreational ground at the Moot (grid reference L6) and the area known as the cricket ground (grid reference H5). Although we agree with this, we believe that the Borough greens (grid references H5 and I5) should be excluded from the settlement boundary as they are also amenity greens.</p> <p>St Laurence Parish church and graveyard are included within the boundary. Given the methodology relating to "religious buildings... physically related to the community" it is unclear to us why the catholic church (grid ref M3) is not included within the settlement boundary and why the Baptist church car park (grid ref I 6) has been excluded although we accept that in the latter case the plot is separated from the church itself, and may thus be exempt from inclusion.</p> <p>Because we believe that the Wiltshire Housing Site Allocations Plan is unsound, we cannot support its legal compliance or soundness but we wish to make the following comments to be noted at the point of compliance.</p> <p>Downton Parish Council believes that the Wiltshire Site Allocations Plan is correct to end the assessment for Downton at Stage 1 as it has a made Neighbourhood Plan (January 2017), has reached the allocated total of housing either being built or with outline planning permission, has identified sites that would be acceptable in principle if the housing allocation is not made and has no area where housing supply needs to be supplemented. Table 2.3 under section 2.9 of the Southern Area Community Topic Paper identifies that Downton Neighbourhood Plan did not include a review of the settlement boundary. This was because we received no advice to do so at the time and the boundary was under consultation as part of the ongoing 2015 review. However we would like to make use of the ability within the Neighbourhood Plan process (even after its adoption) to make amendments within the period of the Plan (i.e. before 2026) and to consider including a properly consulted, local informed settlement boundary review as part of the local Neighbourhood Plan and retaining the authority and force of the Neighbourhood Plan. We have no immediate plans to do this because of the stated intention not to include a further allocation for Downton but, should it become relevant, Downton will consider carrying out this process.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to	In order to represent the views of the Parish Council.				

participate at the oral part of the examination?	
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Comment ID:	2875	Consultee Mrs Lyn Powell	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135161		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The Ridgeway Farm site should be removed from the draft Site Allocations Plan whilst we complete our neighbourhood plan. The neighbourhood plan will convey the views of the village in respect of the scale and location or any development going forward.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2876	Consultee Sarah Capper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135102		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I live in chedglow and use the road from crudwell on a daily basis. I feel that to put a further 40 houses on this site will cause a big problem for the existing road.It is basically just wide enough for two cars but if you add pedestrians (pushing prams) and schoolchildren as well as the high usage of the playground and village hall then the pure volume of pedestrians will surely lead to accidents on a scale not seen before. Furthermore the increase of traffic on to Tetbury Lane and then to the junction of the A429, will cause further problems at the junction which may lead to either traffic lights or a roundabout being installed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2877	Consultee Sarah Capper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135102		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Although I don't have school aged children anymore, I worry for the added stress on school places. My 10 year old grandson, who lives in chedglow as well, and goes to Malmesbury Primary school (they have moved from malmesbury to chedglow, so he had started school there already) has not got a guaranteed place at Malmesbury Senior school as they are full to bursting...adding this many more houses may impact on not only the local crudwell school but also feeding into Malmesbury senior school..</p> <p>I also had thought that crudwell was considered a small village, due to the fact that it didn't have a village shop...and although I am not totally against any expansion, I feel that there could be other sites to consider, in not only our village, but also by neighbouring villages which would spread the load..</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2878	Consultee Sarah Capper	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135102		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I also had thought that crudwell was considered a small village, due to the fact that it didn't have a village shop...and although I am not totally against any expansion, I feel that there could be other sites to consider, in not only our village, but also by neighbouring villages which would spread the load..				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2879	Consultee Mr James Jones	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1135124		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to object to the allocation of housing site 482 east of Farrells Field, Yatton Keynell. I believe this proposal is unsustainable, and the reasoning behind the decision is unsound and inconsistent with national planning policy. There has been a total absence of a neighbourhood plan which would allow residents to engage in the question of future development, which conflicts with paragraph 155 of the National Planning Policy Framework (NPPF). I oppose the proposal of Site 482 in the Wiltshire Housing Sites Allocation Plan. Wiltshire Council must work together more closely with our Parish Council and residents to form a Neighbourhood Plan that would establish the housing need for Yatton Keynell. Withdraw land east of Farrells Field and allow residents of Yatton Keynell to explore other site options, in accordance with NPPF para 155. This proposal would join Yatton Keynell to Tiddleywink in a most dreadful style, reflective of ribbon development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2880	Consultee Mr James Jones	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1135124	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Furthermore, 5 villages of the Chippenham Community Area failed to respond to the consultation on the site allocations plan and settlement boundary review. This leads me to the conclusion that Wiltshire Council have failed to satisfy both the requirements of their own Statement of Community Involvement and with NPPF paragraph 155.</p> <p>Withdraw land east of Farrells Field and allow residents of Yatton Keynell to explore other site options, in accordance with NPPF para 155. This proposal would join Yatton Keynell to Tiddleywink in a most dreadful style, reflective of ribbon development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2881	Consultee Jacqueline Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135127		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As a resident of Crudwell, I would like to register my concern about the proposal to build 40 new homes on the Ridgeway Farm site. Firstly this site has already received permission to build 10 homes which are currently under construction, however, if the proposal for a further 40 homes is passed then it represents an almost 20% increase to the existing housing stock in Crudwell. I understand that the Draft Site Allocations Plan states that housing sites will only be allocated to villages where there is a strategic need to do so but as the Plan also forecasts an oversupply in the Malmesbury Community Area this surely means that Crudwell does not fulfil that criteria. I also understand that there is a similar level of oversupply forecast across the wider housing market area in North and West Wiltshire.</p> <p>The village has begun the process of producing a Neighbourhood Plan a part of which will be to undertake a survey to determine what needs exist for housing and how they should be met. Crudwell is not anti-development but clearly as a community we would like to be involved in determining what those needs are. I would also like to draw your attention to the fact that this additional development would place a strain on existing facilities and services, not to mention the safety implications of increased traffic on Tetbury Lane which is narrow with limited paving and is used by many villagers accessing the Village Hall and play facilities. Many houses have suffered with severe flooding over the past 15 years, additional housing in this location would also place an increased burden on the existing waterways and drains.</p> <p>In conclusion, my understanding is that Policy 1 of Wiltshire's Core Strategy states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities" but no such needs or opportunities, services or facilities have been identified that would be fulfilled or improved by this allocation. So this aspect of the Plan is not consistent with the Strategy. Based on the above points it is clear that there is no substantiated strategic need for further housing allocations in Crudwell but also that it is absolutely appropriate that the Crudwell Neighbourhood Planning should determine what housing is required taking into consideration parishioners wishes and having examined the environmental and infrastructure constraints and options.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2882	Consultee Mr James Jones	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1135124		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Appendix E of the Chippenham Community Area topic paper confirms that no local housing needs survey was undertaken, which conflicts with paragraph 158 of the NPPF which calls for adequate, up to date and relevant evidence. The site selection procedure is unsound, the local village of Sutton Bengier has identified a need for housing and yet none has been allocated, this is in conflict with paragraph 159 of the NPPF. Withdraw land east of Farrells Field and allow residents of Yatton Keynell to explore other site options, in accordance with NPPF para 155. This proposal would join Yatton Keynell to Tiddleywink in a most dreadful style, reflective of ribbon development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2883	Consultee Mr James Jones	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1135124		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Effective</p> <p>Consistent with national policy</p>				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Reading your Community Area Topic Paper – Chippenham Community Area document dated June 2017; I noticed that site SHLAA ref: 474B, land adjacent to The Old Forge was identified as suitable for development and was rejected in Stage 3, but at no point were the local villagers consulted.</p> <p>Withdraw land east of Farrells Field and allow residents of Yatton Keynell to explore other site options, in accordance with NPPF para 155. This proposal would join Yatton Keynell to Tiddleywink in a most dreadful style, reflective of ribbon development.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2884	Consultee Mr James Jones	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1135124		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		The proposal will have a significant impact on the character of the local area, effectively joining Yatton Keynell to Tiddleywink. Yatton Keynell sits in an Area of Outstanding Natural Beauty (AONB) and local planning authorities should ensure that the countryside is protected for the sake of its intrinsic character and beauty. This will not be achieved with this form of ribbon development. I am also aware that the current proposal of 30 dwellings will grow substantially during any planning application process, recent developments in the village attest to that. Withdraw land east of Farrells Field and allow residents of Yatton Keynell to explore other site options, in accordance with NPPF para 155. This proposal would join Yatton Keynell to Tiddleywink in a most dreadful style, reflective of ribbon development.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2885	Consultee Mr James Jones	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1135124		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		This would result in an increase of at least 70 cars and delivery vehicles making their way through our development with all their associated noise, pollution and safety risks for small children which is unacceptable. Withdraw land east of Farrells Field and allow residents of Yatton Keynell to explore other site options, in accordance with NPPF para 155. This proposal would join Yatton Keynell to Tiddleywink in a most dreadful style, reflective of ribbon development.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2886	Consultee Jacqueline Smith	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135127		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I would also like to draw your attention to the fact that this additional development would place a strain on existing facilities and services, not to mention the safety implications of increased traffic on Tetbury Lane which is narrow with limited paving and is used by many villagers accessing the Village Hall and play facilities.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2887	Consultee Jacqueline Smith	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135127	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I would also like to draw your attention to the fact that this additional development would place a strain on existing facilities and services, not to mention the safety implications of increased traffic on Tetbury Lane which is narrow with limited paving and is used by many villagers accessing the Village Hall and play facilities. Many houses have suffered with severe flooding over the past 15 years, additional housing in this location would also place an increased burden on the existing waterways and drains.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2888	Consultee Rachel Dunn	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137557	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I don't believe that this is a sensible proposal since -</p> <p>1) It will obviously open immediately onto the very narrow, twisty and dangerous road between Bratton and Westbury which is always busy and often clogged by enormous lorries. If 40 houses are built then there will be 80 more cars using that road to the detriment of all.</p> <p>2) I have lived in Bratton for 50 years and in that time I have seen the village virtually double in size with these housing estates built all around the village. The village can't absorb any more, for instance it is difficult enough to get a Doctors appointment now never mind if another crowd of people turn up needing healthcare. The School has more than doubled in size since my children went to it but I do not believe there is anymore space, unless they lose a small playground, to add yet more classrooms.</p> <p>I believe the above are very cogent reasons NOT to put more housing in Bratton village.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2889	Consultee N Wyre Person ID: 446149	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Salisbury - Netherhampton Road	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA objective 10. Reduce the need to travel and promote more sustainable transport choices Decision: This will have the exact opposite effect. Thousands of extra journeys each day will make Netherhampton Road to the gyratory system and adjoining roads considerably more congested -> increased danger for cyclists. Extra traffic will violate SA objective 4 and 5a\5b regarding air quality. The infrastructure is not there and I doubt it can be put in place. It needs more than a token cycle lane. Dangerous enough as it is at the moment for cyclists and I use the road regularly. Stop concentrating huge housing developments in a few selected places, based upon large building firms land grabs and spread the housing throughout ALL villages, towns and cities to give small sustainable numbers of houses in each area with minimal impact on the environment and would be of benefit to each village\town\city. Each village\town\city can decide where the houses go and what type, and they could actually be affordable, contribute to the local economy & meet the objectives for the strategy. And you'll still get your Council Tax. Current Wiltshire strategy only benefits the landowners\building firms of these sites. Don't build hundreds of houses at these sites until the infrastructure is in place for these extra vehicles. Infrastructure can't be implemented afterwards (if they actually get implemented) and will be too late. Builder's contributions are pitiful to pay for infrastructure changes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2890	Consultee N Wyre Person ID: 446149	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA objective 1 – destroying large areas of fields, trees and hedges will be detrimental to the local wildlife pushing it further away from Salisbury and it is being downplayed in the strategy. Proper independent assessments must be carried out. Stop concentrating huge housing developments in a few selected places, based upon large building firms land grabs and spread the housing throughout ALL villages, towns and cities to give small sustainable numbers of houses in each area with minimal impact on the environment and would be of benefit to each village\town\city. Each village\town\city can decide where the houses go and what type, and they could actually be affordable, contribute to the local economy & meet the objectives for the strategy. And you'll still get your Council Tax. Current Wiltshire strategy only benefits the landowners\building firms of these sites. Don't build hundreds of houses at these sites until the infrastructure is in place for these extra vehicles. Infrastructure can't be implemented afterwards (if they actually get implemented) and will be too late. Builder's contributions are pitiful to pay for infrastructure changes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2891	Consultee N Wyre	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 446149		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road		Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Where these houses are being built on the floodplain (5b), it is not acceptable nowadays and will impact on existing houses as well. Stop concentrating huge housing developments in a few selected places, based upon large building firms land grabs and spread the housing throughout ALL villages, towns and cities to give small sustainable numbers of houses in each area with minimal impact on the environment and would be of benefit to each village\town\city. Each village\town\city can decide where the houses go and what type, and they could actually be affordable, contribute to the local economy & meet the objectives for the strategy. And you'll still get your Council Tax. Current Wiltshire strategy only benefits the landowners\building firms of these sites. Don't build hundreds of houses at these sites until the infrastructure is in place for these extra vehicles. Infrastructure can't be implemented afterwards (if they actually get implemented) and will be too late. Builder's contributions are pitiful to pay for infrastructure changes.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2892	Consultee Geraldine and Dave Curtis Person ID: 1135178	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.3				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to register my objection to the plans for the Land West of Elizabeth Way (Land SW of Hilperdon Marsh) HILPERTON GAP, Trowbridge, Wiltshire, 16/00672/OUT</p> <p>I consider the Wiltshire housing Site Allocation Plan to be unsound because it is NOT positively prepared, since it does not meet the assessed development requirements objectively. The proposal to increase the size of Trowbridge by more than a quarter exceeds the requirement for the five year supply. This plan is also not justified as they have not explained where the provision for jobs, schools, roads and other services (including recreation) also infrastructure, will be provided to support this plan. The plan is not effective because Wiltshire Council's examination of 'windfall', which is expected to provide 60% of new housing, is inadequate since it is only comprised of one page of the whole 4,500 pages of the plan.</p> <p>This plan is also inconsistent with the national policy as the council have not given enough weight to developing brownfield sites as a matter of priority e.g. Ashton Street centre, Court Mills, Bowyers site, Town Bridge; many of which are derelict and are an eye-sore, and which would lend themselves to providing a great number of homes. This makes a mockery of so-called protected 'green belt' when it is being targeted preferentially over brown sites in this 'land-grab'!</p> <p>Our government and council are ever-concerned with the 'carbon footprint' and actively encourage car-sharing and keeping healthy through daily exercise. So why then, don't they let us keep such recreation areas, right on our doorsteps? Many people would agree that these green sites should be kept for future generations to enjoy and use for recreation as is the case on the other side of town with Southwick Country Park. One size does not fit all, and not everybody can afford to, nor wishes to work out in the depressing and soulless four walls of a 'gym'- some of us prefer to have a brisk walk in the countryside for the sake of both our physical and mental health! It certainly is not a pleasure to walk polluted, over-used streets, and you'll probably find that we'd sooner not bother- this will fuel the obesity, diabetes and depression epidemic and place further strain on local medical services.</p> <p>Please leave us some open (green belt!) spaces to enjoy.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2893	Consultee Mr Andrew Herring Planning Policy Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		New Forest District Council		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>New Forest District Council Reponse to the Consultation on the Pre-submission draft Wiltshire Housing Site Allocations Plan Objectively Assessed Housing Need and Housing Site Selection Approach</p> <p>The draft Wiltshire Housing Site Allocations Plan (WHSAP) is based on the housing requirement from the existing adopted Wiltshire Core Strategy. The Duty to Cooperate statement appendix 2 makes reference to implications of housing requirements of the wider South Wiltshire Housing Market Area that are within the New Forest. We welcome this being recognised as a strategic issue for the Duty to Cooperate. The site selection methodology for the Pre-submission draft Housing Sites Allocation Plan seeks solely to deliver a relatively modest number of additional dwellings to ensure that the Wiltshire Core Strategy housing requirements are met. On this basis it excludes detailed consideration of the housing potential of several of the Large Villages in the South Wiltshire HMA, and does not appear to consider potential needs arising outside of Wiltshire.</p> <p>Officers from NFDC and the new Forest National Park Authority have recently met with Wiltshire representatives to explain that there is likely to be housing need in our plan areas (parts of which are in the Salisbury HMA) that we will not be able to accommodate. Both authorities aim to publish draft local plans for submission early in 2018 and we would ask that in finalising the WHSAP, Wiltshire Council take into account any unmet housing need from our areas.</p> <p>It is also important that future assessment of housing needs in the next review of the Wiltshire Core Strategy includes consideration of the parts of the New Forest located within the Salisbury HMA.</p>				
Attached files (Please see Objective)	4735830				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2894	Consultee Mr Andrew Herring Planning Policy Officer New Forest District Council Person ID: 979508	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1, H3.2, H3.3, H3.4, H3.5, H3.6				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>New Forest District Council Reponse to the Consultation on the Pre-submission draft Wiltshire Housing Site Allocations Plan</p> <p>Recreational impacts on the New Forest European Sites The Habitat Regulations Assessment that forms part of the evidence base for the WHSAP concludes no likely significant effects on the New Forest SPA due to no proposed sites being within the visitor catchment area (HRA uses an 8km radius to establish the visitor catchment area). The draft Housing Site Allocations Plan does not propose to allocate any sites that are proximate to the New Forest SPA/SAC. However, given that there are parts of Wiltsh.ire (e.g. Downton) that are closer to the New Forest SPA/SAC than some locations in New Forest District, and new homes are being constructed in this area, we reiterate the importance for any forthcoming relevant Neighbourhood Plans and the next review of the Wiltshire Core Strategy to have an appropriate mitigation approach for recreational impacts in place for the New Forest SPA/SAC. As the draft WHSAP notes at paragraph 2.21: "There are at the moment over sixty Neighbourhood Plans either being prepared or completed in Wiltshire and many more plans are likely over the years ahead. Many of these involve identifying land to meet the need for new homes. Their role in meeting housing requirements will become more significant alongside the Plan".</p> <p>Air quality impacts on the New Forest European Sites The Wiltshire Core Strategy HRA did not identify an adverse effect on the integrity of any European sites (including the New Forest SAC) from nitrogen deposition, subject to the implementation of an air quality strategy for Wiltshire. This conclusion remains the same on the basis that little has changed and no additional growth is being proposed in those parts of the county closest to those designations. However, following a High Court judgement earlier this year the approach to assessing in combination air quality impacts in the Wiltshire HRA may need to be reconsidered. Appropriate Assessment work for the emerging New Forest Local Plan has for example been unable to screen out potentially significant in-combination effects from nitrogen deposition in a number of main road corridors through the New Forest, including the A36 Salisbury to Southampton. Second stage screening is in progress.</p> <p>In-combination water quality impacts on the Hampshire Avon SAC/SPA/RAMSAR The draft WHSAP proposes site allocations of 910 homes in the South Wiltshire HMA and around 200 in Warminster, all of which will be served by waste water treatment works that discharge to the River Avon or its tributaries. We understand that the Warminster WWTW was unable to achieve the required phosphorus reductions after an EA review of consents in 2010, and that this was part of the reason for production of the River Avon Nutrient Management Plan (2015). We also understand that there are some concerns about whether the NMP has achieved its phosphorus reduction objectives and also that the housing growth assumptions that it is based on are already being exceeded. Appropriate Assessment work in progress for the NFDC Local Plan review has not been able to rule out likely significant effects on water quality, including in-combination effects. The authors recommend further work with the relevant bodies including Wiltshire Council, to gather more detailed evidence to inform the appropriate assessment.</p>				

	<p>It therefore seems likely to us that allocation of additional housing sites in South Wiltshire and Warminster (and any Neighbourhood Plan housing additions on the Avon system e.g. at Downton) may trigger the same in-combination effects issues for Wiltshire Council, affecting high risk parts of the Avon system as identified in the NMP.</p> <p>We suggest that this is a matter that requires joint (and wider) consideration under the Duty to Cooperate to identify appropriate solutions for the Avon catchment as a whole. We would welcome an early discussion about next steps.</p>
Attached files (Please see Objective)	4735830
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2895	Consultee Geraldine and Dave Curtis	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135178	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This plan is also inconsistent with the national policy as the council have not given enough weight to developing brownfield sites as a matter of priority e.g. Ashton Street centre, Court Mills, Bowyers site, Town Bridge; many of which are derelict and are an eye-sore, and which would lend themselves to providing a great number of homes. This makes a mockery of so-called protected 'green belt' when it is being targeted preferentially over brown sites in this 'land-grab'!				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2896	Consultee Mrs Pam Rouquette Chair / member	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Walking, Salisbury Greenspace, Salisbury Air Quality groups Person ID: 1135230		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This response relates to the Salisbury Community Area notably the proposed sites -H3.1 Netherhampton Road and H3.3 -North of Netherhampton Road.</p> <p>I consider the Wiltshire Housing Site Allocations Plan to be unsound for the following reasons:</p> <p>1. Lack of strategic documents: There is frequent reference in the supporting documents for this consultation to strategies and plans which have never been consulted upon or adopted. These include:</p> <p>i) A detailed Salisbury Transport Strategy. All we have to date is a Summary dated November 2012, while the Salisbury Transport Strategy Refresh, which we were promised last year, has not taken place. This would have given the opportunity to assess the transport impact of developments which have already taken place around the city and to come up with new ideas before any further development was proposed. It was agreed in the adopted Wiltshire Core Strategy that to cope with the significant growth planned for Salisbury and the surrounding parishes that a radical approach to transport must be adopted to avoid overwhelming pressure on the road network and an unacceptable increase in air pollution. In spite of this Salisbury has already grown considerably and further sites are now being considered without an adopted Transport Strategy. It seems that without this each site is being considered in isolation rather than assessing the cumulative effect on the road network especially the radial routes into the city.</p> <p>The numbers and location of housing developments have changed significantly from those in the adopted Core Strategy and referred to in the Summary Salisbury Transport Strategy 2012, which included 1,300 houses on the brown field sites of Central Car Park and Churchfields. These developments have been delayed for some reason not explained resulting in the current proposal of further green field developments to the south of the city. Edge of town developments add significantly to traffic movements, resulting in further congestion and deteriorating air quality. In view of this it is vital that Wiltshire Council produce a more detailed Salisbury Transport Strategy which addresses the impact of housing developments that have been completed or are in the process of being built since 2012 and how the new proposals to the south of the city will impact on the current road network.</p> <p>ii) Green Infrastructure Strategy (GI) Core Policy 52. Although there are frequent references to a GI Strategy in the Wiltshire Core Strategy, Core Policy 52, this 'remains in preparation' with, as far as we know, no progress towards consultation or formal adoption. In spite of the recognised importance of GI to the health and wellbeing of a community the Wiltshire Core Strategy does not consider this to be essential infrastructure. Without these two fundamental and interlinked strategies it would seem impossible to assess the impact of further development as proposed in the Draft Housing Site Allocation Plan (WHSAP).</p> <p>Green Infrastructure is key to achieving a major shift to active travel such as walking and cycling. As set out in the Wiltshire Core Strategy "The Council will use its planning and transport powers to help reduce the need to travel particularly by private car by promoting sustainable transport alternatives". The Sustainability Appraisal Report accepts the need for radical improvements to the walking and cycling infrastructure but the</p>				

Council does not have a good record on this where developers have been able to side step Planning conditions e.g at Longhedge Village they have failed to put in any off road links to the adjacent development of Old Sarum and thence to the wider community and the city. The result is an isolated community dependent on the private car.

In view of the lack of a county GI strategy the Salisbury Area Greenspace Partnership Connectivity Group, of which I am chair, have been working on developing a local GI Strategy for the Salisbury Area. Having identified the gaps and missing links within the current network we went on to develop a draft plan for strategic 'greenways' linking new developments to key destinations with the majority of routes being off road and so away from traffic and the health impacts from air pollution associated with walking and cycling along main roads. We believe this would provide the impetus needed for a shift in people's behaviour away from the private car and encourage active travel. Please find attached a map of our draft strategic routes around the city with radial links to key destinations. More detailed descriptions are available.

The Salisbury Cycling Network is developing some of these routes but many of the planned cycling routes are along main roads while green off-road routes are classified as rural routes for recreational purposes. As a settlement grows there needs to be a willingness to create new Rights of Way (RoW) as well as upgrading existing routes. The historic network of RoW does not always serve the needs of growing communities but there seems to be a reluctance to accept that provision of routes that go where people need to travel is vital to encourage modal shift. Wherever possible new routes should be off-road and away from traffic, providing a healthy, safe environment if active travel is to have any impact on minimising the predicted traffic growth.

The Department for Transport encourages Councils to develop Local Cycling and Walking Infrastructure Plans (LCWIPs) as part of the Planning process and incorporate these into Supplementary Planning Documents and Neighbourhood Plans. The views expressed above are backed up by Government Policy e.g. included in the DfT LCWIPS are the following statements encouraging Councils to:

Consider incorporating LCWIPS into Supplementary Planning Documents where this would provide more guidance on the policies in the Local Plan and Neighbourhood Plans.(2.27)

Identify places where new strategic cycling and walking routes can be delivered by a new development, and ensure the protection of alignments for future planned cycling and walking routes (2.29)

Encourage access to green routes away from the highway. (This is increasingly important as air pollution levels along main roads is of growing concern.)

Travel to work areas and the location of significant trip generators should be identified. (The Hospital is a large employer where an off road route from the Netherhampton Road development should be considered avoiding main roads and the Harnham Gyratory).

2. Cross boundary working.

Much of the new housing, already built or proposed in the current Draft Housing Allocations Plan, lies outside the Salisbury Community Area but greenspace and green infrastructure, the network of footpaths and cycleways, must inevitably cross community boundaries; which highlights the importance of cross-boundary working. There appears to be no mention of how this issue will be addressed.

Netherhampton Road sites H3.1/S1028 and H3.3/S1027.

The Council do not appear to have seriously considered the impact of these developments on the road network. There is no improvement to the road infrastructure that is either possible or likely to have any impact on what is already a heavily used route through a residential area with bottlenecks at either end.

The large development of 740 houses on theNetherhampton Roadin the draft plan can only be considered if the impact of traffic on the Harnham Gyratory is addressed and high quality GI is provided to encourage sustainable travel.

Both these sites are within the accepted walking and cycling distance from the City centre and most key destinations. The WHSAP does indicate that the site will be linked to the existing Rights of Way network but my understanding is that the cycleways will mainly be along the main roads with no new 'green' routes being considered or upgrading of existing paths such as Town Path and Broken Bridges footpath. Further details will become apparent if/when a detailed planning application is submitted but we wish to highlight at this stage that these routes need to be identified before detailed design is submitted so that alignments with the least gradient and the most direct route are protected. The incorporation of LCWIPs into Supplementary Planning Documents would avoid the previous pitfalls of developers reneging on agreed Planning conditions.

Attached files (Please see Objective)

4760467

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2897	Consultee Mrs Pam Rouquette Chair / member	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Walking, Salisbury Greenspace, Salisbury Air Quality groups Person ID: 1135230		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This response relates to the Salisbury Community Area notably the proposed sites -H3.1 Netherhampton Road and H3.3 -North of Netherhampton Road.</p> <p>I consider the Wiltshire Housing Site Allocations Plan to be unsound for the following reasons:</p> <p>1. Lack of strategic documents: There is frequent reference in the supporting documents for this consultation to strategies and plans which have never been consulted upon or adopted. These include:</p> <p>i) A detailed Salisbury Transport Strategy. All we have to date is a Summary dated November 2012, while the Salisbury Transport Strategy Refresh, which we were promised last year, has not taken place. This would have given the opportunity to assess the transport impact of developments which have already taken place around the city and to come up with new ideas before any further development was proposed. It was agreed in the adopted Wiltshire Core Strategy that to cope with the significant growth planned for Salisbury and the surrounding parishes that a radical approach to transport must be adopted to avoid overwhelming pressure on the road network and an unacceptable increase in air pollution. In spite of this Salisbury has already grown considerably and further sites are now being considered without an adopted Transport Strategy. It seems that without this each site is being considered in isolation rather than assessing the cumulative effect on the road network especially the radial routes into the city.</p> <p>The numbers and location of housing developments have changed significantly from those in the adopted Core Strategy and referred to in the Summary Salisbury Transport Strategy 2012, which included 1,300 houses on the brown field sites of Central Car Park and Churchfields. These developments have been delayed for some reason not explained resulting in the current proposal of further green field developments to the south of the city. Edge of town developments add significantly to traffic movements, resulting in further congestion and deteriorating air quality. In view of this it is vital that Wiltshire Council produce a more detailed Salisbury Transport Strategy which addresses the impact of housing developments that have been completed or are in the process of being built since 2012 and how the new proposals to the south of the city will impact on the current road network.</p> <p>ii) Green Infrastructure Strategy (GI) Core Policy 52. Although there are frequent references to a GI Strategy in the Wiltshire Core Strategy, Core Policy 52, this 'remains in preparation' with, as far as we know, no progress towards consultation or formal adoption. In spite of the recognised importance of GI to the health and wellbeing of a community the Wiltshire Core Strategy does not consider this to be essential infrastructure. Without these two fundamental and interlinked strategies it would seem impossible to assess the impact of further development as proposed in the Draft Housing Site Allocation Plan (WHSAP).</p> <p>Green Infrastructure is key to achieving a major shift to active travel such as walking and cycling. As set out in the Wiltshire Core Strategy "The Council will use its planning and transport powers to help reduce the need to travel particularly by private car by promoting sustainable transport alternatives". The Sustainability Appraisal Report accepts the need for radical improvements to the walking and cycling infrastructure but the</p>				

Council does not have a good record on this where developers have been able to side step Planning conditions e.g at Longhedge Village they have failed to put in any off road links to the adjacent development of Old Sarum and thence to the wider community and the city. The result is an isolated community dependent on the private car.

In view of the lack of a county GI strategy the Salisbury Area Greenspace Partnership Connectivity Group, of which I am chair, have been working on developing a local GI Strategy for the Salisbury Area. Having identified the gaps and missing links within the current network we went on to develop a draft plan for strategic 'greenways' linking new developments to key destinations with the majority of routes being off road and so away from traffic and the health impacts from air pollution associated with walking and cycling along main roads. We believe this would provide the impetus needed for a shift in people's behaviour away from the private car and encourage active travel. Please find attached a map of our draft strategic routes around the city with radial links to key destinations. More detailed descriptions are available.

The Salisbury Cycling Network is developing some of these routes but many of the planned cycling routes are along main roads while green off-road routes are classified as rural routes for recreational purposes. As a settlement grows there needs to be a willingness to create new Rights of Way (RoW) as well as upgrading existing routes. The historic network of RoW does not always serve the needs of growing communities but there seems to be a reluctance to accept that provision of routes that go where people need to travel is vital to encourage modal shift. Wherever possible new routes should be off-road and away from traffic, providing a healthy, safe environment if active travel is to have any impact on minimising the predicted traffic growth.

The Department for Transport encourages Councils to develop Local Cycling and Walking Infrastructure Plans (LCWIPs) as part of the Planning process and incorporate these into Supplementary Planning Documents and Neighbourhood Plans. The views expressed above are backed up by Government Policy e.g. included in the DfT LCWIPS are the following statements encouraging Councils to:

Consider incorporating LCWIPS into Supplementary Planning Documents where this would provide more guidance on the policies in the Local Plan and Neighbourhood Plans.(2.27)

Identify places where new strategic cycling and walking routes can be delivered by a new development, and ensure the protection of alignments for future planned cycling and walking routes (2.29)

Encourage access to green routes away from the highway. (This is increasingly important as air pollution levels along main roads is of growing concern.)

Travel to work areas and the location of significant trip generators should be identified. (The Hospital is a large employer where an off road route from the Netherhampton Road development should be considered avoiding main roads and the Harnham Gyratory).

2. Cross boundary working.

Much of the new housing, already built or proposed in the current Draft Housing Allocations Plan, lies outside the Salisbury Community Area but greenspace and green infrastructure, the network of footpaths and cycleways, must inevitably cross community boundaries; which highlights the importance of cross-boundary working. There appears to be no mention of how this issue will be addressed.

Netherhampton Road sites H3.1/S1028 and H3.3/S1027.

The Council do not appear to have seriously considered the impact of these developments on the road network. There is no improvement to the road infrastructure that is either possible or likely to have any impact on what is already a heavily used route through a residential area with bottlenecks at either end.

The large development of 740 houses on theNetherhampton Roadin the draft plan can only be considered if the impact of traffic on the Harnham Gyratory is addressed and high quality GI is provided to encourage sustainable travel.

Both these sites are within the accepted walking and cycling distance from the City centre and most key destinations. The WHSAP does indicate that the site will be linked to the existing Rights of Way network but my understanding is that the cycleways will mainly be along the main roads with no new 'green' routes being considered or upgrading of existing paths such as Town Path and Broken Bridges footpath. Further details will become apparent if/when a detailed planning application is submitted but we wish to highlight at this stage that these routes need to be identified before detailed design is submitted so that alignments with the least gradient and the most direct route are protected. The incorporation of LCWIPs into Supplementary Planning Documents would avoid the previous pitfalls of developers reneging on agreed Planning conditions.

Attached files (Please see Objective)

4760467

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2898	Consultee Mrs Pam Rouquette Chair / member	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Walking, Salisbury Greenspace, Salisbury Air Quality groups		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. Inconsistencies and conflicting statements in the Sustainability Appraisal Report Annex 1: Inconsistency in housing numbers for H3.1, land to the south of Netherhampton Road. The proposal is for 640 homes but the Sustainability Appraisal mentions the delivery of 1195 in the summary of objective 8, p.108. This discrepancy would have a major impact on traffic generation. The Report accepts that both these developments would result in a significant increase in traffic on local roads, it says that the developments would contribute to increased congestion at the Harnham Gyratory but that this would only have a minor adverse effect. Is this conclusion realistic when the Summary Salisbury Transport Strategy 2012 stated that the Harnham Gyratory and Park Wall junctions were operating at or near capacity?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2899	Consultee Mrs Pam Rouquette Chair / member	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Walking, Salisbury Greenspace, Salisbury Air Quality groups		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	3. Inconsistencies and conflicting statements in the Sustainability Appraisal Report Annex 1: Traffic implications: Under H3.3 North of Netherhampton Road Objective 2 it states that the site is not considered in reasonable walking and cycling distance of the city and key destinations and residents will rely on the private car. Yet this is contradicted in the summary of Objective 10. The Report accepts that both these developments would result in a significant increase in traffic on local roads, it says that the developments would contribute to increased congestion at the Harnham Gyratory but that this would only have a minor adverse effect. Is this conclusion realistic when the Summary Salisbury Transport Strategy 2012 stated that the Harnham Gyratory and Park Wall junctions were operating at or near capacity?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2900	Consultee Mrs Pam Rouquette Chair / member	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Walking, Salisbury Greenspace, Salisbury Air Quality groups Person ID: 1135230		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Other concerns relating to these sites have been mentioned in the Sustainability Appraisal report these include flooding and landscape setting. Should these sites progress to the Planning Application stage one hopes serious consideration will have been given to flood water storage and Sustainable Drainage Systems.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2901	Consultee Mrs Pam Rouquette Chair / member	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Walking, Salisbury Greenspace, Salisbury Air Quality groups Person ID: 1135230		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Other concerns relating to these sites have been mentioned in the Sustainability Appraisal report these include flooding and landscape setting. Should these sites progress to the Planning Application stage one hopes serious consideration will have been given to flood water storage and Sustainable Drainage Systems.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2902	Consultee Mrs Pam Rouquette Chair / member	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Walking, Salisbury Greenspace, Salisbury Air Quality groups Person ID: 1135230		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Other concerns relating to these sites have been mentioned in the Sustainability Appraisal report these include flooding and landscape setting. Preservation of the cathedral views from the west is important as is the avoidance of intrusion onto higher ground which forms the green backdrop to the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2903	Consultee Mrs Pam Rouquette Chair / member	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Salisbury Walking, Salisbury Greenspace, Salisbury Air Quality groups Person ID: 1135230		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Other concerns relating to these sites have been mentioned in the Sustainability Appraisal report these include flooding and landscape setting. Preservation of the cathedral views from the west is important as is the avoidance of intrusion onto higher ground which forms the green backdrop to the city.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2904	Consultee J E Harrison	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135254		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to state my opposition to the inclusion of sites 3565, 3260 and 1021 in the Trowbridge Site Allocation Plan. The field system is a recognisable part of our heritage and dates back hundreds of years in its current form. The land has been used by many generations for its current use of farming and recreational space and is a valuable and valued asset to the local community. Housing on these sites would not only contradict government policy of building on brownfield sites in preference to greenfield, but would cause massive problems in its creation and existence for current residents. Given that much of the building would take place in an area of notified flooding and standing surface water, the existing residents would have their property seriously threatened by an increased risk of flooding. The proposed development of these sites will also increase the volume of road traffic on the A361 Frome Road, Church Lane and Silver Street Lane and exacerbate a major problem during the rush hour.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2905	Consultee J E Harrison	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135254		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing to state my opposition to the inclusion of sites 3565, 3260 and 1021 in the Trowbridge Site Allocation Plan. The field system is a recognisable part of our heritage and dates back hundreds of years in its current form. The land has been used by many generations for its current use of farming and recreational space and is a valuable and valued asset to the local community. Housing on these sites would not only contradict government policy of building on brownfield sites in preference to greenfield, but would cause massive problems in its creation and existence for current residents. Given that much of the building would take place in an area of notified flooding and standing surface water, the existing residents would have their property seriously threatened by an increased risk of flooding. The proposed development of these sites will also increase the volume of road traffic on the A361 Frome Road, Church Lane and Silver Street Lane and exacerbate a major problem during the rush hour.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2906	Consultee J E Harrison	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135254	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to state my opposition to the inclusion of sites 3565, 3260 and 1021 in the Trowbridge Site Allocation Plan. The field system is a recognisable part of our heritage and dates back hundreds of years in its current form. The land has been used by many generations for its current use of farming and recreational space and is a valuable and valued asset to the local community. Housing on these sites would not only contradict government policy of building on brownfield sites in preference to greenfield, but would cause massive problems in its creation and existence for current residents. Given that much of the building would take place in an area of notified flooding and standing surface water, the existing residents would have their property seriously threatened by an increased risk of flooding. The proposed development of these sites will also increase the volume of road traffic on the A361 Frome Road, Church Lane and Silver Street Lane and exacerbate a major problem during the rush hour.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2907	Consultee Philip Reese Planning Officer	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		North Dorset District Council Person ID: 1135279		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>North Dorset District Council (NDDC) notes the contents of the Wiltshire Housing Site Allocations Plan. NDDC has no objection to this Plan as it is not aware of any potential strategic impacts on the North Dorset District.</p> <p>NDDC notes that a summary of the comments it made in June 2016 with respect to the draft Wiltshire Housing Site Allocations DPD have been recorded in your Duty to Cooperate statement (June 2017). The summary reads: "Shaftesbury is within the North Dorset District boundary but there are limited land options for further growth within their administrative boundary. In their plan examination report the Inspector recommends that a site in the Wiltshire administrative area adjacent to Wincombe Business Park could be considered for housing or employment use."</p> <p>At present we are aware that land adjacent to the north-east of Shaftesbury (but within Wiltshire) has been promoted for mixed use residential-led development by an agent representing the landowners. However, we appreciate that the Housing Site Allocations DPD has been prepared under the framework of the current Wiltshire Core Strategy. Such a development would not be in conformity with this Core Strategy.</p> <p>Furthermore, we are not in a position at this stage to demonstrate that such a site is needed for development purposes. We may have a clearer view after the completion of our Local Plan Review Issues & Options consultation, which is due to start this November. Therefore, we wish it to be noted that expansion of Shaftesbury into Wiltshire's area could be an option that we will need to pursue in the future, and if so, this is something we will need to work with Wiltshire Council on under the duty to cooperate.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2908	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	5.86			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have one very significant issue related to flood risk management in East Warminster and its implication within the draft Housing Allocation Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA), thereby managing and reducing risk of flooding throughout Wiltshire. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). Wiltshire's SFRA identifies certain areas that are at higher flood risk and requires them to undergo these additional flood risk assessments. These areas are Salisbury, Chippenham, Trowbridge and Warminster. In addition, the Core Strategy and associated Sustainability Appraisals highlighted these sites, under guidance from the Environment Agency (EA). The Wiltshire Site Allocation Plan proposes selection of 3 new sites within Warminster, but the selection of the sites has clearly not followed the national planning process through the absence of sequential flood tests. In addition, no reference is made to why the correct national and local flood risk management policies was not followed. Further NPPF guidance clearly states if the correct processes and procedures are not followed then new site selections should be rejected. These processes were followed for the new site selection in Chippenham and therefore should be also followed for Warminster. Observing correct planning procedures before selection of new sites may prevent costly legal challenge in the future, thereby safe guarding Wiltshire tax payer's money. Wiltshire Council should reject the selection of these Warminster sites until sequential flood tests are completed, thereby adhering to national planning policy and guidelines.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>I made a written representation to the Wiltshire Council Cabinet meeting in June on my concerns over the selection of the new sites in Warminster. I was unable to attend due to other commitments. The Cabinet Member for Planning acknowledged receipt of this representation by personally naming me at the meeting, but failed to discuss the implications of lack of following NPPF guidelines and releasing a non-evidence based draft. The Leader assumed it was evidence based. Further, despite a public assurance at the meeting from the Cabinet Member that he would respond to me in writing, he has yet to do so. The Cabinet therefore released a non-evidence based draft plan for Warminster, which is in direct contradiction with national planning policy and guidance. To ensure this representation will be correctly heard, I would wish to discuss the matter verbally with the Inspector</p>				

Comment ID:	2909	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I strongly object to the proposed East of Dene (known locally as Home Farm) allocation for the following reasons:</p> <p>Wiltshire Core Strategy CPI - Development Principles</p> <p>The underlying principles of the Wiltshire Core Strategy seek to manage future development by ensuring that communities have an appropriate balance of employment, infrastructure, service facilities and houses. The strategy recognises that previous growth hasn't always been delivered in a proportionate manner, when housing is delivered into settlements where there are insufficient employment opportunities leading to out-commuting. The West Urban Extension, which is a mix of housing, employment land, primary school, local amenities, etc was specifically selected to accommodate the above and thus avoid out-commuting.</p> <p>The East of Dene site is purely a housing site and does not meet the principles of the Core Strategy listed above, in providing the balanced facilities that are needed for a self-contained community.</p> <p>Wiltshire Council and Warminster Town Council have both recognised that Warminster is unusual in that most residents commute out of town for work. The main towns for employment are Bristol, Bath, Frome, Westbury, Trowbridge and Salisbury. With the exception of Salisbury, all of these would involve residents from the East of Dene crossing Warminster Town Centre or using Copheap. This proposed site therefore will contribute to Warminster's current severe traffic problems, in order to reach the new employment area on the West Urban Extension or Bath, Bristol, Frome, Trowbridge and Westbury:</p> <p>Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, as the development site within Warminster. This site can also take the perceived increase in housing numbers for Warminster, if Wiltshire disagree with the above arguments and representations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>I made a written representation to the Wiltshire Council Cabinet meeting in June on my concerns over the selection of the new sites in Warminster. I was unable to attend due to other commitments. The Cabinet Member for Planning acknowledged receipt of this representation by personally naming me at the meeting, but failed to discuss the implications of lack of following NPPF guidelines and releasing a non-evidence based draft. The Leader assumed it was evidence based.</p> <p>Further, despite a public assurance at the meeting from the Cabinet Member that he would respond to me in writing, he has yet to do so. The Cabinet therefore released a non-evidence based draft plan for Warminster, which is in direct contradiction with national planning policy and guidance.</p> <p>To ensure this representation will be correctly heard, I would wish to discuss the matter verbally with the Inspector</p>				

Comment ID:	2910	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Housing Need Wiltshire's documentation now indicates that Warminster is 468 houses short of its target. The underlying reason for this shortfall has been the delay in agreeing solutions for the issues associated with the West Urban Extension development. Problems particularly associated with Warminster include secondary education places, flooding, pollution of the River Wylye, traffic, recreation, and loss of green buffer. Time is required to provide the additional facilities needed to support development in Warminster and therefore the proposed rate of development on the West Urban Extension is the maximum possible given these constraints. The Home Farm site does not provide any additional facilities and so rather than increase the overall number of houses completed, it would limit the number that could be immediately developed on the West Urban Extension in order to stop undue burden on an already overstretched supporting infrastructure Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector. Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, as the development site within Warminster. This site can also take the perceived increase in housing numbers for Warminster, if Wiltshire disagree with the above arguments and representations.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I made a written representation to the Wiltshire Council Cabinet meeting in June on my concerns over the selection of the new sites in Warminster. I was unable to attend due to other commitments. The Cabinet Member for Planning acknowledged receipt of this representation by personally naming me at the meeting, but failed to discuss the implications of lack of following NPPF guidelines and releasing a non-evidence based draft. The Leader assumed it was evidence based. Further, despite a public assurance at the meeting from the Cabinet Member that he would respond to me in writing, he has yet to do so. The Cabinet therefore released a non-evidence based draft plan for Warminster, which is in direct contradiction with national planning policy and guidance. To ensure this representation will be correctly heard, I would wish to discuss the matter verbally with the Inspector				

Comment ID:	2911	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		N2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>River Wylfe</p> <p>The pollution problems associated with the River Wylfe were recently discussed at a Wiltshire Council 'Our Community Matters' event. Recognising that the River Wylfe is a SAC, and as such is afforded the highest protection under European Law the Wiltshire Council's Ecology Officer (See Below) comments are specific and concerning on the Wylfe.</p> <p>These comments indicate that if this site is developed, in conjunction with the West Urban Extension, he anticipates significant amounts of pollution will be discharged into the Wylfe. The Core Strategy selected the West Urban Extension as the Warminster development site and therefore it would not be appropriate to hinder development of this site by also granting permission for this new site.</p> <p>Wiltshire Council 's Ecology Officer- "River Avon SAC - The East of Dene development would presumably discharge to Warminster sewage works (STW). This STW discharges into the River Wylfe, which is part of the River Avon SAC, a European protected site, which has nationally agreed targets for its water quality. The targets are being widely breached across the catchment for phosphorus. As a result the Environment Agency and Natural England have therefore published a Nutrient Management Plan to demonstrate how water quality will be improved over the next few years to ensure the targets are met. However, it is currently recognised there is a high risk that the plan will not deliver its objectives for the upper Wylfe (and lower Avon) sub-catchments. The Council is therefore not able to approve planning applications that would discharge to Warminster STW, where they would take the quantum of development above that forecast in the Wiltshire Core Strategy.</p> <p>Permitted and pending applications currently exceed the Core Strategy allocation and this places uncertainty in the short to medium term for further residential housing applications in the Warminster catchment. The Council is working with Wessex Water, the EA and NE to undertake further modelling of housing growth scenarios and identify the scope for measures that would offset additional forecast phosphate.</p> <p>This situation will have implications for the current pre-application site.</p> <p>Optimistically the matter could be resolved within the next year. However, it seems more likely that significant further growth at Warminster may be delayed until after 2020 when advanced phosphate stripping technologies may be available for the STW</p> <p>Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, as the development site within Warminster. This site can also take the perceived increase in housing numbers for Warminster, if Wiltshire disagree with the above arguments and representations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you	I made a written representation to the Wiltshire Council Cabinet meeting in June on my concerns over the selection of the new sites in Warminster. I was unable to attend due to other commitments. The Cabinet Member for Planning acknowledged receipt of this representation by				

consider it necessary to participate at the oral part of the examination?

personally naming me at the meeting, but failed to discuss the implications of lack of following NPPF guidelines and releasing a non-evidence based draft. The Leader assumed it was evidence based.
Further, despite a public assurance at the meeting from the Cabinet Member that he would respond to me in writing, he has yet to do so. The Cabinet therefore released a non-evidence based draft plan for Warminster, which is in direct contradiction with national planning policy and guidance.
To ensure this representation will be correctly heard, I would wish to discuss the matter verbally with the Inspector

Comment ID:	2912	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flooding</p> <p>The site is subject to ground water and surface water flooding issues. Many instances of flooding have been reported to Wiltshire Council by residents of Grange Lane, those close to the Sutton Veny roundabout and Bishopstrow village over the past few years. These reports have included photographic evidence, available if required.</p> <p>The new proposed allocation is within Flood Zone 1 in relation to fluvial flood risk. The recent review of 'The Winter Floods of 2015/2016 in the UK' brings together both river flow and meteorological data in an analysis of the events that led to extensive river flooding. This report considered the three months of 'remarkably persistent and exceptionally mild cyclonic' activity which, along with Storm Desmond, included the major storms of Abigail, Frank and Gertrude.</p> <p>Current speculation is that the flood risk is increasing due to climate change and higher river flow trends over the last five decades, especially in western Britain. Wiltshire and the EA report concerns over flooding on this proposed site, Bishopstrow Village, Sutton Veny roundabout and Grange Lane. I remain very concerned that if this development was to be allowed, a period of persistent rain would not only cause this site to flood, but also increase significantly the risk of flooding to adjacent properties and surface water discharge into the River Wylye, endangering properties down stream.</p> <p>Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, as the development site within Warminster. This site can also take the perceived increase in housing numbers for Warminster, if Wiltshire disagree with the above arguments and representations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>I made a written representation to the Wiltshire Council Cabinet meeting in June on my concerns over the selection of the new sites in Warminster. I was unable to attend due to other commitments. The Cabinet Member for Planning acknowledged receipt of this representation by personally naming me at the meeting, but failed to discuss the implications of lack of following NPPF guidelines and releasing a non-evidence based draft. The Leader assumed it was evidence based.</p> <p>Further, despite a public assurance at the meeting from the Cabinet Member that he would respond to me in writing, he has yet to do so. The Cabinet therefore released a non-evidence based draft plan for Warminster, which is in direct contradiction with national planning policy and guidance.</p> <p>To ensure this representation will be correctly heard, I would wish to discuss the matter verbally with the Inspector</p>				

Comment ID:	2913	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Access & Traffic</p> <p>The proposed access from this site is onto the Boreham Road, which has a speed limit of 30 mph at this point. Local residents witness speeds of traffic in both directions significantly higher and consider there is a high risk of accidents happening at the proposed junction. The matter is made worse as traffic flowing from Warminster towards Salisbury needs to negotiate a blind bend before meeting the proposed junction within 200 metres. All local residents close to the proposed entrance consider Boreham Rd to be at its most dangerous on this bend due to lack of clear sight and non observance of speed limits. The Wiltshire traffic officer was not at liberty to comment on the perceived danger of the bend, merely the entrance splay lines as defined by national policy.</p> <p>Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, as the development site within Warminster. This site can also take the perceived increase in housing numbers for Warminster, if Wiltshire disagree with the above arguments and representations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>I made a written representation to the Wiltshire Council Cabinet meeting in June on my concerns over the selection of the new sites in Warminster. I was unable to attend due to other commitments. The Cabinet Member for Planning acknowledged receipt of this representation by personally naming me at the meeting, but failed to discuss the implications of lack of following NPPF guidelines and releasing a non-evidence based draft. The Leader assumed it was evidence based.</p> <p>Further, despite a public assurance at the meeting from the Cabinet Member that he would respond to me in writing, he has yet to do so. The Cabinet therefore released a non-evidence based draft plan for Warminster, which is in direct contradiction with national planning policy and guidance.</p> <p>To ensure this representation will be correctly heard, I would wish to discuss the matter verbally with the Inspector</p>				

Comment ID:	2914	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Environment</p> <p>This site was considered for development during the West Wiltshire District Plan and the examiner described the site as - "I saw that the land mostly comprises arable fields, with similar fields to the north, together with a few cottages and other houses (some set in trees) and bounded by lanes or roads, to the east, west and south. Although there is urban development immediately to the west (across Grange Lane), the area has a pleasant and obviously rural appearance and is very much on the edge of Warminster.</p> <p>From my observations from local footpaths to the north, west and east of the area and from Battlesbury Hill, I consider that the land relates well in visual terms to the open countryside to the north and east, forming an integral part of the countryside east of the town. I accept that a high stone wall and cottages fronting Boreham Road impact on any meaningful visual relationship with the countryside to the south, other than when seen from the Hill top. However, in view of the open-ness of the land and its linkage with other open land to the east and north (and especially Battlesbury Hill), I consider that the town policy limit hereabouts should be drawn along the eastern edge of the denser development fronting The Dene, St George's Close and (the southern part of) Grange Lane."</p> <p>The character of this site has not changed since this time and I further agree with Wiltshire's Conservation Officer who reported on speculative development 16/10502/FUL -</p> <p>The development of this site is extremely problematic in terms of the potential adverse impact the development would have on the character of the area and the setting of designated heritage assets, principally Bishopstrow House, The Cotes and the Bishopstrow Conservation Area. Irrespective of the quality of the development or design of the individual units, it is difficult to see how development of this area would make "a positive contribution to local character and distinctiveness" of the area (para 126 of the NPPF).</p> <p>Core policy 58 also requires that 'development should protect, conserve and where possible enhance the historic environment'.</p> <p>My view is that this proposal would fail to protect or conserve.</p> <p>Wiltshire Council has spent many years considering the best options for development, which resulted in the Core Strategy gaining approval after long examination by the nominate Planning Inspectorate. This site was considered as part of this process and rejected at the planning stage by Wiltshire, followed again at the examination stage by the Planning Inspector.</p> <p>Wiltshire selected the West Urban Extension, with its allocated supporting infrastructure and supporting employment areas, as the development site within Warminster. This site can also take the perceived increase in housing numbers for Warminster, if Wiltshire disagree with the above arguments and representations.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to	I made a written representation to the Wiltshire Council Cabinet meeting in June on my concerns over the selection of the new sites in Warminster. I was unable to attend due to other commitments. The Cabinet Member for Planning acknowledged receipt of this representation by				

participate at the oral part of the examination?

personally naming me at the meeting, but failed to discuss the implications of lack of following NPPF guidelines and releasing a non-evidence based draft. The Leader assumed it was evidence based.
Further, despite a public assurance at the meeting from the Cabinet Member that he would respond to me in writing, he has yet to do so. The Cabinet therefore released a non-evidence based draft plan for Warminster, which is in direct contradiction with national planning policy and guidance.
To ensure this representation will be correctly heard, I would wish to discuss the matter verbally with the Inspector

Comment ID:	2915	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Home Farm (East of the Dene) allocation is proposing locating 100 houses adjacent to The Dene and leaving southern/south west part of the site undeveloped to preserve the character of the area and significance of surrounding heritage assets.</p> <p>The proposed Home Farm allocation forms part of SHLAA site 603, with the rest being excluded from the allocation in order to protect:</p> <p>Listed buildings in the vicinity, including Bishopstrow House Bishopstrow Conservation Area Views from Battlesbury Camp hillfort</p> <p>The only access to the proposed site is from Boreham Road, which will cut through the south/south west area, thus negating Wiltshire Council's concern for the southern part of the site.</p> <p>Further changing the settlement boundary to include the area of the road from Boreham Rd to the development site in the allocation will only encourage developers to keep applying for speculative planning permission for the remaining land of Home Farm in the future.</p> <p>The total area of Home Farm is part of the current speculative planning application 16/10502/FUL.</p> <p>It does not appear that Strategic Planning have taken into account the negative views of the specialists advising Wiltshire Council on this speculative application 16/10502/FUL.</p> <p>Wiltshire should exclude the road joining the proposed area of East of Dene to Boreham Rd. from the allocation and not change the settlement boundary other than to include the proposed development site.</p> <p>By keeping the remaining Home Farm land outside the settlement boundary, a restriction on future speculative development is reinstated but the site allocation acknowledges the need for access from Boreham Road to the proposed new housing development site.</p> <p>Further, the remaining area of Site 603 should be incorporated into the Bishopstrow Conservation Area, which borders the site. This will prevent exploitation by speculative developers in the future and preserve the unique nature of the surrounding heritage assets which Wiltshire stresses is a priority to do.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2916	Consultee Mr Michael Vaughan Person ID: 1135445	Agent Mr David Bevan Managing Director HLF Planning Ltd Person ID: 1135453	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.80			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SUPPORT</p> <p>The provision of extra land within the settlement boundary will aid the council's five year land supply. This is a positive allocation, it is justified to deliver much needed housing and is consistent with national policy.</p> <p>To ensure timely delivery the land owner would request a meeting with the council with a view to submitting a planning application in anticipation of the formal adoption of the policy in line with the NPPF paragraph 216. This would ensure that the plan is effective in what it is seeking to achieve.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2917	Consultee Mr Nick Parker Person ID: 397127	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.52		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>Home Farm (East of the Dene) allocation is proposing locating 100 houses adjacent to The Dene and leaving southern/south west part of the site undeveloped to preserve the character of the area and significance of surrounding heritage assets.</p> <p>The proposed Home Farm allocation forms part of SHLAA site 603, with the rest being excluded from the allocation in order to protect:</p> <p>Listed buildings in the vicinity, including Bishopstrow House Bishopstrow Conservation Area Views from Battlesbury Camp hillfort</p> <p>The only access to the proposed site is from Boreham Road, which will cut through the south/south west area, thus negating Wiltshire Council's concern for the southern part of the site.</p> <p>Further changing the settlement boundary to include the area of the road from Boreham Rd to the development site in the allocation will only encourage developers to keep applying for speculative planning permission for the remaining land of Home Farm in the future.</p> <p>The total area of Home Farm is part of the current speculative planning application 16/10502/FUL.</p> <p>It does not appear that Strategic Planning have taken into account the negative views of the specialists advising Wiltshire Council on this speculative application 16/10502/FUL.</p> <p>Environment</p> <p>This site was considered for development during the West Wiltshire District Plan and the examiner described the site as -</p> <p>"I saw that the land mostly comprises arable fields, with similar fields to the north, together with a few cottages and other houses (some set in trees) and bounded by lanes or roads, to the east, west and south. Although there is urban development immediately to the west (across Grange Lane), the area has a pleasant and obviously rural appearance and is very much on the edge of Warminster.</p> <p>From my observations from local footpaths to the north, west and east of the area and from Battlesbury Hill, I consider that the land relates well in visual terms to the open countryside to the north and east, forming an integral part of the countryside east of the town. I accept that a high stone wall and cottages fronting Boreham Road impact on any meaningful visual relationship with the countryside to the south, other than when seen from the Hill top. However, in view of the open-ness of the land and its linkage with other open land to the east and north (and especially Battlesbury Hill), I consider that the town policy limit hereabouts should be drawn along the eastern edge of the denser development fronting The Dene, St George's Close and (the southern part of) Grange Lane."</p> <p>Wiltshire should exclude the road joining the proposed area of East of Dene to Boreham Rd. from the allocation and not change the settlement boundary other than to include the proposed development site.</p> <p>By keeping the remaining Home Farm land outside the settlement boundary, a restriction on future speculative development is reinstated but the site allocation acknowledges the need for access from Boreham Road to the proposed new housing development site.</p>				

	Further, the remaining area of Site 603 should be incorporated into the Bishopstrow Conservation Area, which borders the site. This will prevent exploitation by speculative developers in the future and preserve the unique nature of the surrounding heritage assets which Wiltshire stresses is a priority to do.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2918	Consultee David Goodship	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1133638		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to 3565 and state. 'Recommendations (continued) Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <ul style="list-style-type: none"> • Boundary hedgerows / tree lines • Lambrok Stream <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats. This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal. Directives in the 2017 HRA should be adhered to and the site should be removed from the proposal forthwith.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I wish to have the opportunity to explain my objections in detail, which is not possible on this form.				

Comment ID:	2919	Consultee Chris Saunders Chairman	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Easterton Parish Council Person ID: 1135495		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This email follows a discussion at Easterton's Parish Council Meeting on 18th Sept. Councillors were pleased to note that in the Wiltshire Council Draft Housing Plan - specifically that affecting Market Lavington - that part of Market Lavington, referred to as 'Fiddington Hill', has been blocked out in black and shown in Appendix B as "removed at stage 4". This decision, to create a 'substantial green buffer in order to provide a soft urban edge to the village' especially where this area directly abuts the village boundary with that of Easterton, receives the full support and approval of Easterton Parish Council.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2920	Consultee Mrs carol hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126309		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I am writing to inform you of my objections to Wiltshire Councils Proposed Development Site at Southwick Court - 3565. My objections to the unsuitability of the proposed development are based on the Plan being unjust and not consistent with national policy 'where brown field sites should at all times take precedent over any others.' Brown field sites at Bowyers and the former Council Offices on Bradley Road in addition to other sites in and surrounding Trowbridge have received outline planning permission but are not favoured by developers. The site at Southwick Court is purely developer driven and led and not in the interests of the County Town of Trowbridge, the outlying villages of Southwick and North Bradley or the wider communities it serves. Remove site 3565 from Proposal			
Attached files (Please see Objective)		4759772 / 4759788			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		A complex case needs full investigation and exposition of the facts and should not be developer led.			

Comment ID:	2921	Consultee Mrs carol hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126309		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council are not complying with their core strategy, a document which clearly states that developments should not be built where villages are swallowed up by towns. Boundary Walk in Trowbridge forms the parish boundary that divides Trowbridge from Southwick. Development of this site would contradict the core strategy.</p> <p>Development of the site is not sound, sustainable, economically viable or legally compliant and should be withdrawn from the Plan in its entirety. Remove site 3565 from Proposal</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A complex case needs full investigation and exposition of the facts and should not be developer led.				

Comment ID:	2922	Consultee Mrs carol hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126309		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The land designated at Southwick Court is of significant archaeological importance encompassing medieval earthworks with fish ponds. Any development on or near the site would undermine the archaeology and cause irrefutable and permanent damage to the integrity of the medieval site.</p> <p>Southwick Court is a Grade II* Listed property. Development in the immediate and surrounding area would alter the historic aspect of the building and its surroundings. Heavy lorries, persistently travelling in close proximity/adjacent to the building and its out buildings together with construction machinery would undermine the very foundations of the listed property and outlying land. Digging foundations for houses and roads would potentially affect the very structure that has been designated as of significant historic importance. As custodians of listed buildings, we have a duty of care to ensure they are preserved and any threat to their integrity must be challenged for future posterity.</p> <p>The land designated at Southwick Court on Wiltshire's Housing Site Allocation Plan is surrounded by a continuous and unbroken medieval hedge demarcating parish boundaries as evidenced on the 1793 map. According to the 1997 Hedgerow Act, it would be deemed unlawful to break through any part of the hedgerow as it comes with preservation rights. Permission to break through may only be granted in the event of a breach to national security or to gain access during an emergency/crisis situation where no alternative access can be gained. If such an event was deemed necessary any breakthrough must by law be reinstated with the hedgerow being replanted to preserve its integrity. Access to the proposed building site would necessitate a breakthrough of the hedgerow.</p> <p>Given the location of Southwick Court and the scale and regularity of flooding that is currently known by government agencies, any further development on an identified flood plain would pose an immediate threat to the structure of the Grade II* listed building. Wiltshire Council has a duty to ensure the buildings are preserved and government advice and recommendations are strictly adhered to.</p> <p>Remove site 3565 from Proposal</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A complex case needs full investigation and exposition of the facts and should not be developer led.				

Comment ID:	2923	Consultee Mrs carol hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126309		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Medieval hedgerows are habitats for fauna, flora insects, mammals and birds. Species such as voles and colonies of Bechstein bats have inhabited the environment for hundreds of years. By preserving the hedgerows we are ensuring the ecology of the site is maintained for future generations and species that are at risk of extinction can remain in their natural habitat, thus reducing potential threats to the eco system of the area. Remove site 3565 from Proposal			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		A complex case needs full investigation and exposition of the facts and should not be developer led.			

Comment ID:	2924	Consultee Mrs carol hill Person ID: 1126309	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Land that has been designated in the plan for development falls into a category 2/3 floodplain area. See plan supplied by Environmental Agency for South Court Farm enclosed within this letter. A significant area of the proposed site floods annually. Drainage systems in Sandringham Road are currently unable to cope with water from the flood plain during spells of heavy rain and gardens are regularly subjected to sewage spewing out of drainage holes. This currently poses a significant health risk to the residents. Additional housing developments would exacerbate the situation and put additional strain on a network that is currently unable to serve the current housing stock and unfit for propose. Extensive test pits carried out on the site in July 2017 on behalf of Waddington Homes, a subsidiary of Barratt Homes, highlighted a lack of adequate drainage. The site lies on a bed of clay with less than 10 inches of top soil. The paucity of soil prevents the fields from draining freely and effectively. It must be noted at this point that one of the test pits was located on top of a medieval earthworks where the level of soil was greater due to the nature of the archaeology beneath. Not only will test results potentially highlight erroneous and inaccurate data from this survey, more importantly the integrity of a significant archaeological site has been compromised by a developer led and financial drive to develop land that is not required to fulfil the government housing request. Brown field sites that have been granted outline planning permission have yet to be developed and remain untouched. Given the location of Southwick Court and the scale and regularity of flooding that is currently known by government agencies, any further development on an identified flood plain would pose an immediate threat to the structure of the Grade II* listed building. Wiltshire Council has a duty to ensure the buildings are preserved and government advice and recommendations are strictly adhered to. This is the most up to date Environmental Agency Map for site – 3565. [Map is attached.] In conclusion, the development of site 3565 would be split in two by the floodplain that covers an estimated area of between one and three acres. The Lambrook Stream emanates from Southwick Court and regularly bursts its banks during periods of heavy and persistent rainfall. Following the flooding of 2007 the Pitt report stated, ‘building on floodplains should be the absolute exception, done only in areas of genuine housing shortage where there is no alternative land available.’ Remove site 3565 from Proposal			
Attached files (Please see Objective)	4736738			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A complex case needs full investigation and exposition of the facts and should not be developer led.			

Comment ID:	2925	Consultee Mrs carol hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126309		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Economic and sustainable</p> <p>The designated proposed site is currently farmed by a tenant farmer (Mr Marshall) at Bramble Farm who uses the fields to graze his cows. Moreover the land produces hay to feed the cattle throughout the winter months. The farm is sustainable in its current form given the extent of its acreage. Any reduction to the size and scale of the site would be untenable and the farm would not be economically viable. As the land has been economically sustainable for a significant period of time any development on the fields would render future farming viability as null and void. By developing the site any future economic and financial prosperity would be terminated forthwith. Wiltshire Council are responsible for ensuring economic sustainability and any development that serves to alter the integrity and continuity of land use that has existed for a significant period of time must be challenged.</p> <p>Remove site 3565 from Proposal</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A complex case needs full investigation and exposition of the facts and should not be developer led.				

Comment ID:	2926	Consultee Mrs carol hill Person ID: 1126309	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Development of the site would necessitate the need for a clearly identified and extended infrastructure to support an increase in population and an influx of pupils. Road systems, health providers and schools need to be provided to meet increased demands. In Friday, July 14, 2017 copy of The Wiltshire Times, the front cover featured an article titled 'Housing boom fuels primary school crisis.' The article highlighted the lack of school spaces and the growing severity of the situation in Trowbridge and its surrounding area. Schools in the Trowbridge area have neither, the budget, or grounds to expand, and the two schools identified for construction are destined for the Ashton Park site. Clare Medland, Wiltshire Council's head of school place commissioning believes the two primary schools due to be built in Ashton Park will not be enough to meet the needs of the town and is quoted as saying. 'If hundreds of houses are built then the situation will become critical. Primary schools in the Trowbridge area are already tight. If all these applications are approved it would create a real problem.' Monies that have been made available by the property developer looking to develop land in Southwick off Blind Lane have been allocated to The John of Gaunt School and Walwayne Court Primary. Walwayne Court is situated at the other side of Trowbridge. Families would be forced to drive their children across town adding to the already congested roads during peak times of the day. Families will incur additional financial pressure as parents will require transportation to access a school space. Parents have a right to expect adequate and appropriate schooling provision within walking distance of housing developments. Remove site 3565 from Proposal				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A complex case needs full investigation and exposition of the facts and should not be developer led.				

Comment ID:	2927	Consultee Mrs carol hill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126309		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In conclusion, the development of site 3565 would be split in two by the floodplain that covers an estimated area of between one and three acres. The Lambrook Stream emanates from Southwick Court and regularly bursts its banks during periods of heavy and persistent rainfall. Following the flooding of 2007 the Pitt report stated, 'building on floodplains should be the absolute exception, done only in areas of genuine housing shortage where there is no alternative land available.' The derelict site at Bowyers, the former library site and the abundance of empty retail shops in the centre of Trowbridge could provide affordable units for first time buyers, older people looking to downsize whilst also providing affordable properties for the rental market. The central location would provide easy access to shops, leisure facilities and valuable public transport links to neighbouring towns and cities.</p> <p>Thank you for taking the time to consider my objections to the proposed development at Southwick Court – 3565.</p> <p>Remove site 3565 from Proposal</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A complex case needs full investigation and exposition of the facts and should not be developer led.				

Comment ID:	2928	Consultee Mr Jon Cleverly Person ID: 1126714	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The detail in this letter should be considered as part of my representation in response to question 6 on the attached form. In response to question 6 on the form, I set out my reasons for the plan being unsound on the following grounds:</p> <p>The proposed site is outside of the boundary for the village and is unsustainable</p> <p>There is no evidence of any housing need for Yatton Keynell</p> <p>Yatton Keynell has a lack of a Neighbourhood plan</p> <p>The site selection process has been unsound</p> <p>There are significant infrastructure issues on the site proposed</p> <p>The consultation process has been poor</p> <p>The proposal for 30 houses in this area will have a significant impact on the character of the area</p> <p>These points have been further justified below. I have detailed how the plan does not comply with National Policy and how it is not justified, effective or positively prepared.</p> <p>There is an Absence of a Neighbourhood Plan</p> <p>Of the five large villages within the Chippenham Community Area, Yatton Keynell is the only village without a Neighbourhood Plan. It is acknowledged that delivery of housing supply through a community led Neighbourhood Plan offers a positive and proactive approach to delivering housing need rather than a site selection process which is only put forward by landowners.</p> <p>The local Ward Councillor (Cllr Scott) called for a Neighbourhood Plan to be made at a Parish Council meeting back in November 2014 (copy of minutes attached and minutes quoted below). This was suggested in response to specific concerns that were raised by the community in relation to the proposal for development of land adjacent to Farrells Field. The Parish Council have not addressed this request.</p> <p>Notes from the minutes to November 2014 (extract)</p> <p>'Cllr. Scott advised that Yatton Keynell should look into setting up a neighbourhood plan, which allows people in the village more of a say as to what they want in terms of any developments that may be proposed'. (extract)</p> <p>The proposed land is just outside the village boundary for Yatton Keynell, and unless the village see it a necessity the council favours objecting to the development'. (extract)</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states:</p> <p>'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be engaged in a proactive way, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>There have been applications for development by local residents in Yatton Keynell (as infill) including a recent one in Tiddlywink which would work towards addressing the local community need.</p> <p>The site selection process is unsound</p>				

	<p>Para 5.13 of the Chippenham Community Area Remainder Topic Paper - June 2017 states that the village of Sutton Benger which has an identified a housing need, was discounted as a village which could accommodate additional housing growth. The Plan states that the village primary school cannot accommodate growth and therefore the village cannot accommodate more housing. The exclusion of the village from the housing allocation plan seems unjustified as the plan should consider all housing types not just those for families. Just because the school is full that doesn't exclude new housing being delivered for elderly, and people without children (flats starter homes). If some additional housing was accepted in Sutton Benger it might reduce the overall need for housing which has been identified in the other larger villages where there is considered no housing need.</p> <p>In light of these views I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a neighbourhood plan for Yatton Keynell which will explore whether there is a specific housing need in this village. A neighbourhood plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated which will dramatically change the landscape and approach to the village.</p> <p>In line with NPPF para 155 allow Neighbourhood Plan to be prepared and the local residents to look into other options for sites. Until that is done remove land at east of Farrells Field.</p>
Attached files (Please see Objective)	4736780
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2929	Consultee Mr Jon Cleverly	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126714		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Outside of village boundary Land east of Farrells Field is currently outside of the village boundary. Granting permission for housing allocation means an extension to the village perimeter in turn linking up the separate communities that surround it (Tiddlywink and Cold Harbour). Currently there is open country-side which is a green site. It provides an attractive green buffer zone separating Yatton Keynell from the adjacent but separate small communities at Cold Harbour and Tiddlywink to the south-east. Recent applications for development by local residents have been turned down by the very fact they reside outside of the village boundary. As a resident of the village, I acknowledge the importance of sustainable housing growth, however this proposal to allocate one development of 30 houses at the edge of the village is unsustainable, outside of Yatton Keynell boundary and will have a negative impact on the future of the village. The site is outside the framework of settlements boundary and is open country-side. It provides an attractive green buffer zone separating Yatton Keynell from the adjacent but separate small communities at Cold Harbour and Tiddlywink to the south-east. Another factor which was not considered as part of the site selection was the landscape constraints in place for the village Yatton Keynell. A significant amount of Yatton Keynell settlement and adjoining land is washed over by AONB rendering a large area of land that is not available for development. This fact should have been identified as a constraint in the overall site selection process and taken into account when considering the amount of new development proposed in the village. 30 dwelling will have a significant impact on the character of the area Para 5.31 identifies land East of Farrells Field, Yatton Keynell for the development of approximately 30 dwellings which currently resides outside of the boundary. The Council claim that 'it is in a location that has the capacity to accommodate change from an environmental, heritage and landscape perspective, and could assimilate into the existing built form, whilst positively conserving and enhancing the village-edge setting'. However, a large scale proposal of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area. In line with NPPF para 155 allow Neighbourhood Plan to be prepared and the local residents to look into other options for sites. Until that is done remove land at east of Farrells Field.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2930	Consultee Mr Jon Cleverly Person ID: 1126714	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There is No evidence of housing need for Yatton Kevnell</p> <p>The proposal for 30 houses on land east of Farrells Field has been put forward at County level in order to meet the County's strategic housing requirements for the Chippenham remainder area. The site allocation for 30 houses in Yatton Keynell is not based on any evidence that there is a specific local housing need in Yatton Keynell. Appendix E of the Chippenham Community Area topic paper, confirms that no local housing needs survey was undertaken as part of the draft Plan. The proposed dwellings should be justified with evidence that there is a specific local need and the plan should confirm how that need will be met.</p> <p>In light of the above the plan is unsound, it not justified and is not consistent with national policy set out in paragraph 158 of the NPPF which states:</p> <p>'Each local planning authority should ensure that the local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'. The village of Yatton Keynell which has no evidence of identified housing need (this is minuted in Parish Council Meeting minutes November 2014,attached), and no Neighbourhood plan has been identified for having a significant proportion of the 138 dwellings needed to meet the Chippenham Area Strategic housing target.</p> <p>The housing sites selection process is contrary to Para 159 of the NPPF. It states:</p> <p>'local planning authorities should have a clear understanding of housing needs in their area. They should:</p> <ul style="list-style-type: none"> -prepare a strategic Housing Market Assessment to assess their full housing needs andThe Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period whichaddresses the need for all types of housing, including affordable housing and the needs of different groups in the community such as but not limited to families with children, older people people with disabilities, service families and people wishing to build their own homes...'; <p>In line with NPPF para 155 allow Neighbourhood Plan to be prepared and the local residents to look into other options for sites. Until that is done remove land at east of Farrells Field.</p>				
Attached files (Please see Objective)	4736780				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2931	Consultee Mr Jon Cleverly	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126714		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There are Infrastructure issues</p> <p>Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area. The development of Blacksmith Close has put the drainage at capacity. These issues are identified in the site allocation supporting text, and the need for a capacity appraisal and further assessment is required. Infrastructure needs should be identified and established prior to the allocation of the site. In line with NPPF para 155 allow Neighbourhood Plan to be prepared and the local residents to look into other options for sites. Until that is done remove land at east of Farrells Field.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2932	Consultee Mr Jon Cleverly	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1126714		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Lack of community engagement and poor consultation</p> <p>The planning process which has taken place and resulted in the Farrells Field site being put forward for housing, has not been meaningful, as it has not provided opportunity for the local community to comment on or consider alternative sites. The Parish Council have not engaged in the plan process or adequately represented the views of the local people in response to the proposal being put forward. (as noted in point 2.)</p> <p>I consider the proposed allocation for such a large site which will have such a significant impact on the community in Yatton Keynell should be the subject of a more meaningful consultation process by means of a Neighbourhood Plan.</p> <p>It is my understanding (from P61 of the Chippenham Community Area Remainder Topic Paper) that of the five large villages identified as part of the Chippenham remaining area, none of the Parish Council's responded to the Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement. It states in para 2.23:</p> <p>Town and parish councils are the most local tier of democratic representation and, as such, they provide a key link with local communities. They are a specific consultation body under the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 requires that Wiltshire Council has to consult with specific consultation bodies which they consider may have an interest in the subject. Wiltshire Council is committed to continuing to consult with the local councils'.</p> <p>In light of the above, the plan is unsound as it is inconsistent with national policy set out in Para 155 of NPPF which states:</p> <p>'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide selection of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.</p> <p>In line with NPPF para 155 allow Neighbourhood Plan to be prepared and the local residents to look into other options for sites. Until that is done remove land at east of Farrells Field.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2933	Consultee Mrs Amanda Cuff Person ID: 701840	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as I feel your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified- The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p>			

	For the above reasons, I object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring next year.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2934	Consultee Mrs Amanda Cuff Person ID: 701840	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as I feel your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified- The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p>				

	For the above reasons, I object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring next year.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2935	Consultee Mrs Amanda Cuff	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 701840	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring next year.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2936	Consultee Julian & Jane Davies / Holdsworth Person ID: 1135674	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.12				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to raise my concerns in relation to the above public consultation event.</p> <p>I would like to object to the allocation of housing site 482 adjacent to Farrells Field in Yatton Keynell which is proposed for 30 houses. As a resident of Yatton Keynell village I acknowledge the importance of sustainable housing growth in the village however, I consider the proposal to allocate one development of 30 houses at the edge of the Yatton Keynell village is unsustainable and will have a negative impact on the future of the village.</p> <p>I have the following concerns about how the selection process of this site has evolved. I believe the proposed housing sites allocation plan is unsound and is not consistent with national planning policy for the following reasons:</p> <p>No evidence of housing need for Yatton Keynell</p> <p>Appendix E of the Chippenham Community Area topic paper) confirms that no local housing needs survey was undertaken as part of the plan. The proposed dwellings should be justified with evidence that there is a specific local need.</p> <p>Relevant national policy in conflict with: paragraph 158 of the NPPF which states: 'Each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic , social and environmental characteristics and prospects of the area. Strategies for housing and other uses are integrated and they take into account relevant market and economic signals'.</p> <p>Lack of a Neighbourhood Plan</p> <p>At a Parish Council meeting in November 2014 there was a call for a Neighbourhood Plan to be made for Yatton Keynell so that residents can engage in how many and where future housing might take place:</p> <p>"Cllr Scott advised Yatton Keynell should look into setting up a neighbourhood plan which allows people in the village more of a say as to what they want in terms of any developments that may be proposed. The land proposed is just outside the village boundary for Yatton Keynell and unless the village see it a necessity the council favours objecting to the development".</p> <p>Relevant national policy in conflict with: Para 155 of NPPF</p> <p>Site selection process unsound</p> <p>Sutton Benger has an identified need and no housing has been allocated. Yatton Keynell has no identified need yet 30 houses are proposed .</p> <p>Relevant national policy in conflict with: Para 159 of the NPPF</p> <p>In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell, which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)	4772809				
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	2937	Consultee Julian & Jane Davies / Holdsworth	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135674	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure issues</p> <p>Drainage is considered to be fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to the limited drainage supply capacity in the local distribution mains and that there is a potential need to serve the site by a pumped connection for foul water and that the site falls within a groundwater vulnerability area.</p> <p>In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell, which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)	4773052				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2938	Consultee Julian & Jane Davies / Holdsworth	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135674	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Poor consultation None of the Parish Council's from the five villages in the Chippenham Community Area responded to Wiltshire Council's consultation on the site allocations plan and settlement boundary review. This raises questions about the quality of the consultation that has taken place in order to create the plan and whether the Council has met the necessary requirements set out in its Statement of Community Involvement. (Para 155 of NPPF) In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell, which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)	4773056				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2939	Consultee Julian & Jane Davies / Holdsworth	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135674	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Proposal will have significant impact on the character of the area</p> <p>Adding a development of 30 additional houses at the entrance to the village is not suitable and will have a negative impact on the character of the area. The allocations plan states (section 5.31 p. 18) site 482 “ is in a location that has the capacity to accommodate change from an environmental, heritage and landscape perspective, and could assimilate into the existing built form, whilst positively conserving and enhancing the village-edge setting”. This statement is unfounded and incorrect - the development no matter what form it takes will severely detract from the leafy village edge setting YK now possesses.</p> <p>In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell, which will explore whether there is a specific housing need in this village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.</p>				
Attached files (Please see Objective)	4773059				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2940	Consultee Miss Eleanor Fitton Strategic Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Berkeley Strategic Person ID: 1135680		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation has been prepared in response to the Housing Site Allocations Plan ("the plan") in relation to the proposed settlement boundary for Devizes. Berkeley Strategic ("Berkeley") is the freehold owner of 7.2 hectares of the land at Horton Road, Devizes ("the site"). The site is allocated in the Wiltshire Adopted Core Strategy where it has been identified as a strategic employment allocation under Core Policy 12 whereby the site is referenced as the Land between A361 and Horton Road, Devizes. The policy states the strategic allocation will contribute a total of 8.4 ha of employment land.</p> <p>In reference to paragraph 36 of the Core Strategy Inspector's Report, the Inspector addresses the problem of relying upon pre-existing development plan documents to inform decisions concerning the settlement boundaries and stated these boundaries can be seen to be out of date. It was therefore concluded in paragraph 37 of the report that this issue could be resolved adequately by the Housing Sites Allocations DPD. The proposed settlement boundary for Devizes has been prepared contrary to paragraph 4.15 of the Wiltshire Core Strategy, which states the need for the settlement boundaries to be reviewed as part of the Sites DPD. The Core strategy states development outside the settlement boundary will be strictly controlled whereby the relaxation of the boundaries will only be supported where it has been formally reviewed through a subsequent DPD or community-led neighbourhood plan.</p> <p>Berkeley objects to the proposed Devizes settlement boundary on the basis that, following the adoption of the Core Strategy and the allocation of the land at Horton Road, the settlement boundary has not been amended to include within the settlement the land allocated under Core Strategy Policy 12. The settlement boundary is therefore not justified as it is inconsistent with the Core Strategy.</p> <p>The failure to include the allocated land within the settlement boundary poses a risk to the future development of this site, for the reasons set out at paragraph 4.15 of the Core Strategy.</p> <p>Berkeley is seeking a modification to the proposed settlement boundary of Devizes to include the Core Strategy employment allocation set out in Inset Map 11: Devizes, at Appendix 1. This shows the proposed allocation under Core Policy 12. Therefore, Berkeley seeks a change to the settlement boundary as shown in the Draft Proposals for Revised Settlement Boundaries Plan that was prepared by Wiltshire Council, which is included at Appendix 2.</p>				
Attached files (Please see Objective)	4736809 / 4736808				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Berkeley is the freehold owner of the land between A361 and Horton Road, Devizes. Therefore we deem it suitable to participate at the examination given the risk that the failure to amend the settlement boundary poses to the future development of this allocated site.				

Comment ID:	2941	Consultee Olive M Malcolm	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135683		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I wish to make representations regarding the Council's Draft Housing Site Allocations Plan dated June 2017, currently out for consultation. I am a resident of Crudwell, Malmesbury, Wilts and my representations focus on the allocation of the site at Ridgeway Farm, Crudwell : SHLAA Site 3223 (or 3233) for a further 40 houses.</p> <p>My representations are as follows:</p> <p>The allocation of this site is not necessary to meet any strategic need for housing, which is already met or exceeded by completed, committed or planned developments in the North & West Wiltshire Housing Market Area (HMA) and the Malmesbury Community Area (MCA). (This claim is supported by numbers quoted in the draft Site Allocation Plan.)</p> <p>The Plan also states that, in Large Villages such as Crudwell, development should be '...limited to that needed to help meet the housing needs of settlements and improve... (employment) opportunities, services and facilities.' It further states (at Clause 4.4) that 'Some new development, to meet local needs, may be appropriate at some of the designated Large Villages...' However, the nature of these needs local to Crudwell is not explored in the Plan, nor how development of this site at the scale envisaged would contribute to satisfying them.</p> <p>The site is outside both the existing settlement boundary and the revised boundary proposed in the Plan. Clause 2.8 of the Plan states that '...development outside the settlement boundary is, with limited exceptions, not acceptable.'</p> <p>A significant development of houses on the proposed Ridgeway Farm site is not appropriate and will only serve to exacerbate the infrastructure and environmental concerns expressed previously. [Officer note: specific issues have been separated into individual comments, number 2942 and 2942] There may be other potential development sites which should be considered instead. I believe that the best way to identify what developments can and should be put forward in the future is through the Crudwell Neighbourhood Plan which is currently being developed. Indeed, the Site Allocations Plan acknowledges that planning controls should pass to local communities.</p> <p>For the reasons stated above, I do not think that the allocation of the Ridgeway Farm site for a further 40 houses is justified and therefore it should be withdrawn from the Site Allocations Plan pending development of Crudwell's own Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2942	Consultee Olive M Malcolm	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135683		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The allocation is disproportionately and unjustifiably large with regard to the existing community in the village of Crudwell. 40 additional houses would represent approximately a 15% increase for the village itself.</p> <p>Previous proposals for development on this site were scaled down after legitimate concerns were raised by local people, in particular with regard to the ability of the infrastructure to cope with these additional dwellings. The increase in traffic would result in congestion and pose serious threats to pedestrians using Tetbury Lane to access the Village Hall and playing fields. The potential risk of flooding would also be exacerbated.</p> <p>For the reasons stated above, I do not think that the allocation of the Ridgeway Farm site for a further 40 houses is justified and therefore it should be withdrawn from the Site Allocations Plan pending development of Crudwell's own Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2943	Consultee Olive M Malcolm	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135683	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The village First School is fully subscribed and is also situated in a Conservation area, meaning that there would be a number of constraints on expansion. The character of the school would change significantly if any large-scale expansion were to be considered. There are also few employment opportunities in Crudwell and there is no village shop. Moreover, public transport links are limited, so access to work, shops, medical facilities etc. would largely be by car.</p> <p>For the reasons stated above, I do not think that the allocation of the Ridgeway Farm site for a further 40 houses is justified and therefore it should be withdrawn from the Site Allocations Plan pending development of Crudwell's own Neighbourhood Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2944	Consultee Mrs Jane Hennell Area Planner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Canal & River Trust Person ID: 1069602		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Thank you for your consultation on the Pre-submission draft Wiltshire Housing Site Allocations Plan. The Canal & River Trust have considered the content of the document and have no comments to make at this time.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2945	Consultee General Ashley TRULUCK Chair, Broad Chalke Neighbourhood Plan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Broad Chalke PC Person ID: 893417		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.82 (and Appendix A of Community Area Topic Paper Wilton)			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Broad Chalke Parish Council and its Neighbourhood Plan team are pleased to see that our substantive comments submitted at the earlier consultation stage have been noted. We therefore agree with the broad conclusions of the WILTON Community Area Topic Paper i.e.</p> <ul style="list-style-type: none"> that all SHLAA sites should be removed from consideration of prospective development sites in Broad Chalke (as concluded in the Wilton Community Area Topic Paper). that Settlement Boundaries should be rationalised to take account of recent development, the curtilage of existing properties and environmental factors (as shown on the Broad Chalke Proposals for Revised Settlement Boundaries at Appendix A to the Wilton Community Area Topic Paper). that there is therefore no scope for large-scale housing development in Broad Chalke. <p>However, we have two concerns:</p> <ul style="list-style-type: none"> That the proposals for revised settlement boundaries do not include consideration of the area designated 'H16' on the existing Settlement Plan i.e. the housing development on Gurston Road (north of 'The Marsh' on the western side of the village). The timing of the consultation precludes inclusion of positive proposals emerging from our Neighbourhood Plan. <p>In these respects (alone) we submit that the Wiltshire Housing Site Allocations Plan (as it applies to Broad Chalke) is not as sound or effective as it could be.</p> <p>1.7 Settlement area H17 (Gurston Road) – including garden curtilages - should be included in the proposals for revised Settlement Boundaries (Appendix A – Broad Chalke - Map grid reference C7)</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		No, I do not wish to participate at the oral examination - but would be very happy to do so if you feel this would help your deliberations or understanding of the issues raised here.			

Comment ID:	2946	Consultee General Ashley TRULUCK Chair, Broad Chalke Neighbourhood Plan	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Broad Chalke PC Person ID: 893417		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Community Area Topic Paper Wilton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Broad Chalke Parish Council and its Neighbourhood Plan team are pleased to see that our substantive comments submitted at the earlier consultation stage have been noted. We therefore agree with the broad conclusions of the WILTON Community Area Topic Paper i.e.</p> <ul style="list-style-type: none"> that all SHLAA sites should be removed from consideration of prospective development sites in Broad Chalke (as concluded in the Wilton Community Area Topic Paper). that Settlement Boundaries should be rationalised to take account of recent development, the curtilage of existing properties and environmental factors (as shown on the Broad Chalke Proposals for Revised Settlement Boundaries at Appendix A to the Wilton Community Area Topic Paper). that there is therefore no scope for large-scale housing development in Broad Chalke. <p>However, we have two concerns:</p> <ul style="list-style-type: none"> That the proposals for revised settlement boundaries do not include consideration of the area designated 'H16' on the existing Settlement Plan i.e. the housing development on Gurston Road (north of 'The Marsh' on the western side of the village). The timing of the consultation precludes inclusion of positive proposals emerging from our Neighbourhood Plan. <p>In these respects (alone) we submit that the Wiltshire Housing Site Allocations Plan (as it applies to Broad Chalke) is not as sound or effective as it could be.</p> <p>2. Broad Chalke Neighbourhood Plan.</p> <p>This is now nearing completion with legal negotiation ongoing with landowners to finalise development site(s). In accordance with the conclusions of the Wiltshire Council Site Allocation Plan, we do not envisage any large-scale development. However, we reserve the right to present community proposals for a very limited mixed development (affordable and market homes in the ratio of 2:1) taking note of the environmental, schooling and highways factors cited in the draft Site Allocation Plan. We have discussed our proposals with the relevant Wiltshire Council representatives in Spatial Planning and Highways Departments who are supportive. We will therefore be bringing our final proposals forward by Spring 2018, i.e. as soon as the current negotiations and community consultation are complete.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination - but would be very happy to do so if you feel this would help your deliberations or understanding of the issues raised here.

Comment ID:	2947	Consultee Mr Antony Pinsent Person ID: 1135685	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7, H2.8, H2.9		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to:</p> <p>Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and</p> <p>Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as I feel your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified- The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring 2018.</p>				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2948	Consultee Mr Antony Pinsent Person ID: 1135685	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the draft Wiltshire Housing Site Allocations Plan. You advice that Wiltshire proposes to: Revise, where necessary, existing settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Wiltshire's Market Towns, Local Service Centre's and Large Villages; and Allocates new sites for housing to ensure the delivery of homes across the plan period to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas over the period to 2026.</p> <p>I object to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as I feel your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the change to the settlement boundary for East of Dene is not required, is illogical and will allow developers the opportunity to further speculatively develop the site beyond your proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified- The draft plan for Warminster is not an appropriate strategy, when compared against other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire force developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p>				

	For the above reasons, I object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for Spring next year.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	2949	Consultee Mr Antony Pinsent	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135685		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7, H2.8, H2.9			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consistent – The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2950	Consultee Mr Adam Fiander	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 408128		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Harnham lacks the infrastructure to support an extra 850 houses. Of most concern is the local road system which will not cope with another 1000 plus cars in what is as highly residential area with 30 MPH limit which no one adheres to anyway.</p> <p>I have two young children aged 11 and 9 and I am very concerned about the danger for them of crossing the Netherhamton Road. The single zebra crossing opposite the One Stop shop is not sufficient. Traffic often speeds at up to 60 MPH on this stretch of road.</p> <p>The Harnham gyratory currently cannot cope with the volume of traffic and there are often long delays, especially during rush hours and the same for the Wilton Park Wall junction. With the extra houses, the situation will be made much worse.</p> <p>The site is not within walking distance of town, so cars will be used even if the bus service was increased.</p> <p>Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths.</p> <p>The road needs to be made much safer. The 30 MPH limit is not adhered to by most who use this road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views heard.				

Comment ID:	2951	Consultee Mr Adam Fiander Person ID: 408128	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Harnham lacks the infrastructure to support an extra 850 houses. Of most concern is the local road system which will not cope with another 1000 plus cars in what is as highly residential area with 30 MPH limit which no one adheres to anyway. I have two young children aged 11 and 9 and I am very concerned about the danger for them of crossing the Netherhamton Road. The single zebra crossing opposite the One Stop shop is not sufficient. Traffic often speeds at up to 60 MPH on this stretch of road. The Harnham gyratory currently cannot cope with the volume of traffic and there are often long delays, especially during rush hours and the same for the Wilton Park Wall junction. With the extra houses, the situation will be made much worse. The site is not within walking distance of town, so cars will be used even if the bus service was increased. Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. The road needs to be made much safer. The 30 MPH limit is not adhered to by most who use this road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views heard.				

Comment ID:	2952	Consultee Mr Adam Fiander	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 408128		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The houses are due to be built on an area which regularly floods. The water run-off from the proposed site is not known and we fear that the run off from the new estate would worsen the flood risk in Harnham. The smaller site for 100 extra houses (site H3.3) is proposed to be built on a current flood plain and there is often standing water on this site.</p> <p>Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths.</p> <p>The road needs to be made much safer. The 30 MPH limit is not adhered to by most who use this road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views heard.				

Comment ID:	2953	Consultee Mr Adam Fiander	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 408128		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The houses are due to be built on an area which regularly floods. The water run-off from the proposed site is not known and we fear that the run off from the new estate would worsen the flood risk in Harnham. The smaller site for 100 extra houses (site H3.3) is proposed to be built on a current flood plain and there is often standing water on this site.</p> <p>Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths.</p> <p>The road needs to be made much safer. The 30 MPH limit is not adhered to by most who use this road.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views heard.				

Comment ID:	2954	Consultee Mr Adam Fiander	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 408128		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am also concerned about the anti-social aspects caused, because there is simply a lack of anything for young people and teenagers in Harnham to occupy their time. This is a quiet, semi-rural area that is not set up for such a mass of additional people Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. The road needs to be made much safer. The 30 MPH limit is not adhered to by most who use this road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views heard.				

Comment ID:	2955	Consultee Mr Adam Fiander	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 408128		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am also concerned about the anti-social aspects caused, because there is simply a lack of anything for young people and teenagers in Harnham to occupy their time. This is a quiet, semi-rural area that is not set up for such a mass of additional people Major traffic alterations around Salisbury need to be put in place, including cycle and pedestrian paths. The road needs to be made much safer. The 30 MPH limit is not adhered to by most who use this road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I am a resident of Harnham and would like my views heard.				

Comment ID:	2956	Consultee Mr and Mrs G.K. and M.A. Whiffen	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135801	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We would like to register our objection to this proposed development for the following reason:</p> <p>These fields are beyond the natural boundary of the brook</p> <p>Is an expansion into open countryside and is against Wiltshire County Council's own strategy not to fill in gaps between villages and towns.</p> <p>The solar farm was placed where it is away from any development this proposal would put development closer to the farm.</p> <p>The fields being on a flood plain should be redesignated as a village green. My family having enjoyed the open fields for dog walking, blackberrying and collecting damsons for over 20 years.</p> <p>The local and main roads cannot sustain anymore traffic, at peak times the queues are very long. Frustrating.</p> <p>The infrastructure is insufficient to accommodate any increase in population and facilities provided are extremely poor compared to other Wiltshire towns.</p> <p>There are other more suitable sites within the town and other towns that developers could build on and pressure should be put on them to commence building.</p> <p>Facilities provided by Wiltshire County Council in Melksham at cost of several millions of pounds, additional housing should be developed there.</p> <p>There development would affect all manor of wildlife not just the Bechstein bat's but birds, foxes, dear and numerous wildfowl at times.</p> <p>Many other points of objection have been forwarded to you some very profound, all of which we fully support but would be pointless in repeating here.</p> <p>Thank you for taking the time to read this, and hopefully you may be able to support our objections.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2957	Consultee Iain Valentine Person ID: 1135814	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>I write to register my serious concerns regarding the proposal to allow the development of an additional 40 houses on long established farm land at Ridgeway Farn, Crudwell.</p> <p>Over the past 15 years I have been supportive of sustained development within the village. This includes the current development of 10 houses on the Ridgeway Farm site adjoining Tetbury Lane which I think was originally proposed in 2014. When considering the development of this site my main concern was for the impact the development would have on properties in the village that were flooded in 2007.</p> <p>Current development of 10 homes on Ridgeway Farm</p> <p>The developers held a presentation in the Village Hall for the purpose of addressing villager concerns. On attending this presentation I made enquires as to how the drainage from the proposed residential properties would be managed. The developers at that point demonstrated they were aware of the flooding in 2007 and made a number of salient points.</p> <ol style="list-style-type: none"> 1. The homes were to be constructed primarily on a farm yard that was primarily hard standing. 2. The proportion of hard standing to free drainage would not much alter because of gardens and the use of materials in driveways that would allow drainage to the underlying soil. 3. The run off from the farm yard was already flowing into Tetbury Lane. 4. Recognising this, part of the development would include a large underground large sink well into which run off from rainfall would be directed. It was suggested that this inclusion would in fact lessen the existing run off from the site to Tetbury Lane. <p>The explanation satisfied my main concerns.</p> <p>I did have secondary concerns about the size of the proposed development, which was originally for 19 houses, and the ability of the village infrastructure to cater for this in a short time frame and the dangers to pedestrians if there was more road and pedestrian traffic in the existing narrow and laneway which has no footpath. There was a vague undertaking to see what could be done on that matter.</p> <p>When the final plans for ten new homes on the site were presented I was supportive of the development.</p> <p>Over the past few months I have intermittently seen the building commence. It is possible I may have missed the digging and installation of the sink well that was discussed by the developer. But I now do have a concern that if this has not been included, then I was misled in the presentation made to the village parishioners. I know that this query should be easily resolved and my concerns allayed.</p> <p>Flooding in the Village</p> <p>It should be common knowledge that a score or more homes in the village were flooded in 2007. I would describe the situation as “flash flooding” because the flood waters rose very rapidly and then fell just as quickly. This is an important point to understand because I believe it demonstrates that the village per se is not in a flood plain.</p> <p>I was in the village the day that the homes were flooded and saw first-hand how the flood developed.</p>				

The storm water and sewerage systems were unable to cope with the volume of water and backed up. Pressurised water and sewerage started gushing out of the man hole covers into the A429. As rains continued Tetbury Lane virtually became a river as run off from the homes in streets to the north flowed down into Tetbury Lane.

Some of this water flowed south of the village in a watercourse flowing behind the area known as the Butts. It caused flood damage to some of the houses in this development. This stream flows under the A429 at the southern edge of the village. The drain under the road could not cope with the volume of water and so backed up, flooding homes at the south end of the village. The water from this stream entered the A429 where it flowed back down towards the watercourse known as Swillbrook in the centre of the Village.

As the water flowed down the A429 it met with the flood waters flowing down Tetbury Lane. I would estimate that the water across the A429 was 12-18" deep at this point.

Swillbrook runs parallel to Tuners Lane. Run off from the homes on streets to the north of Tuners Lane entered Swill Brook which burst its banks.

The run off from Swillbrook met with the floodwaters flowing down the A429. The bridge on the A429 under which Swillbrook flows was unable to cope with the volume of water and so the homes within 100m or so of the bridge were flooded.

The situation was worsened with additional water flowing into Swill Brook as the watercourse running south down the A429 also overflowed.

As the rain eased, the volume of water trying to flow under the bridge on the A429 reduced and the area drained within a few hours.

Following the flooding I attended a community meeting in the Village Hall that I think was facilitated by the Parish Council. At this meeting were four representatives from DEFRA. They bluntly explained that village was recognised as a flood risk, but was not a priority because of its rural location. What funds they had were being directed to flood defences in more populated urban areas. In brief, DEFRA were not prepared to assist the village in any way.

I wanted to describe this to you because

1. I believe it clearly demonstrates that the village cannot cope with any actions that increase the speed and volume of run off into the streams surrounding the village.
2. DEFRA acknowledged the village as a flood risk in 2007 but were quite clear in stating that flood alleviation work was not a priority.

Proposed Development of a further 40 houses on Ridgeway Farm

The eco-system surrounding the village has been reasonably stable for hundreds of years. The surrounding woodlands have transitioned to farmland. The surrounding fields have continued to protect the village from flooding for hundreds of years by absorbing water into ground and, when saturated, slowing the rate of run off into adjoining waterways.

Over many hundreds of years the village has gradually grown to approximately 250 dwellings.

I understand that the current proposal for 40 new houses on Ridgeway Farm forms part of a master plan to perhaps develop 150 houses on the site. Such a development in a short time frame will alter the fabric of the village and challenge its infrastructure. I know that many Villagers will be commenting in detail on these concerns, many of which I share. However, I believe that these are all secondary considerations because the proposed location will increase the risk of flood damage and so is quite unsuitable for any further development.

The proposed development on Ridgeway Farm is on an area that the ordinance map shows is elevated above both Tetbury Lane and Tuners Lane. As such, it is outside the areas of the village that are prone to flood risk. However, development on this location will increase the occurrence and severity of flash flooding within the village for four reasons.

1. The loss of agricultural land which would absorb rainfall.
2. The loss of agricultural land which would reduce the rate of flow of water from saturated land into the village.
3. The accelerated flow of storm water and into the village from the residential downpipes and road side gutters.
4. The additional sewerage that would flow into the village when already over stretched pumping stations receive this additional volume.

The explanation of how the village flooded in 2007 describes the problems we face. Locating 40 additional houses on Ridgeway Farm will only exacerbate the flood risk.

Whilst reviewing the current development of 10 houses on Ridgeway Farm I became more aware of actions that developers can take to provide on-site storage of run-off water. The heavy consistent rain fall in in the days leading up to the flooding in July 2007 would most probably have filled any on-site water storage to capacity. This would mean that the run off from guttering, roads and hard course on the properties will flow unimpeded into the surrounding water courses.

I believe that should the development proceed it could lead to the loss of approximately a dozen homes surrounding Swill Brook and increased flood damage to a further 20 or so homes in The Butts and The Street. Insurance companies already recognise that many homes in the village are a high flood risk. If the destruction witnessed in 2007 becomes more common, homes affected around Swill Brook will be uninsurable and unsaleable. Eventually they will be abandoned. The impact on the aesthetics of the village will be considerable. The financial losses will be measured in millions of pounds. The impact on residents affected is immeasurable.

Liability for Damages

Many persons familiar with the Village understand the effect this development will have on flood risk. The land owners who are offering to make the land available for a residential development must also fully understand that should this proceed, they will be effectively destroying the viability of around a dozen existing homes. As long standing parishioners they will also be aware that scores of other homes that were marginally affected by flooding in 2007 will now be at a higher risk. The developer of the ten homes being constructed on Ridgeway Farm acknowledged the flood risk in the village consultation process. They must also be aware that the development now being proposed cannot use the defence of being built on a site with hard standing already in place. As professionals in residential development they will understand, or be expected to understand, that building on this site will lead to increased incidence and severity of flooding on the village. Finally, given the concerns I have raised, and which I expect others will have raised, the Council and its planning officers will also be aware of the impact.

I think it is a reasonable moral expectation that each of the parties should consider the effect of their actions on others and simply withdraw the plan.

However, when a party is aware that an action is likely to lead to damage to another person or property a legal liability is created. If this development was to proceed, I wonder what action will be considered when the village next floods? When we have a repeat of the rains of 2007 I would expect residents who know their homes are about to flood will be collecting real time evidence of how the events unfold. I can envisage experts being brought in to study this evidence and conclude that the flooding was caused, or the severity of the flooding was exacerbated, by the run off of water from the proposed Ridgeway development.

There will be a body of evidence showing that the risk of damage was known to the parties involved in planning and approving the development. It would seem to me a legal action for damages for losses suffered is likely to be raised. Could the land owner, developer, council and its officers all be considered liable for losses that could be pursued in the courts?

Conclusion

From my perspective, any development proposal in Crudwell that puts at risk the viability of existing homes, or increases the risk of damage to existing homes, should quite simply be rejected.

This Residential Development Proposal on Ridgeway Farm, Crudwell risks the eventual abandonment of around a dozen existing homes and increased flood damage risk to perhaps 20 other homes. Hence, it must be rejected.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2958	Consultee Iain Valentine	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135814	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write to register my serious concerns regarding the proposal to allow the development of an additional 40 houses on long established farm land at Ridgeway Farn, Crudwell.</p> <p>Over the past 15 years I have been supportive of sustained development within the village. This includes the current development of 10 houses on the Ridgeway Farm site adjoining Tetbury Lane which I think was originally proposed in 2014.</p> <p>Proposed Development of a further 40 houses on Ridgeway Farm</p> <p>Over many hundreds of years the village has gradually grown to approximately 250 dwellings.</p> <p>I understand that the current proposal for 40 new houses on Ridgeway Farm forms part of a master plan to perhaps develop 150 houses on the site. Such a development in a short time frame will alter the fabric of the village and challenge its infrastructure. I know that many Villagers will be commenting in detail on these concerns, many of which I share.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2959	Consultee Mr G Wasey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135849	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Ridgeway Farm Development / Crudwell Parish Neighbourhood Plan</p> <p>Please take this letter as a formal objection to the allocation of a further 40 dwellings at Ridgeway Farm, Crudwell, currently contained within the Wiltshire 'draft' Housing Site Allocation Plan under consultation. As a parish resident for over 20 years, I strongly objected to the planning proposal on the site for 30 dwellings in 2014. Permission was subsequently for 10 units - presently underway and already causing significant irritation noise-wise; traffic-wise and general nuisance-wise.</p> <p>I find it thoroughly reprehensible that a plan now seems to be in the offing to exceed the original declined development application by a significant margin. How can this be? The original concerns and objections have not been ameliorated...they are still, relevant and thus still apply! The draft plan defies any logic and is a major threat to this village and its residents.</p> <p>Apparently, the allocation against Crudwell has arisen because we do not have a so-called 'Neighbourhood Plan'? The importance of this administrative device has not been made clear to the villagers although I do understand that one has been in the pipeline for several years and that the Wiltshire planning department was involved in the early work. I feel that the whole village has been let down by you at 'Head Office'; our local councillor Mr Berry and naturally our Parish Councillors. Perhaps this was a deliberate strategy to pave the way for other parishes to get their plans sorted leaving Crudwell - probably the most outlying of parishes given our closeness to the Gloucestershire border – as the dumping ground/pressure valve release for the county's perceived housing need? In short, the previous objections remain entirely relevant. Increasing the village size by 20-25% is ludicrous and will only exacerbate the issues originally raised regarding infrastructure; road usage (the roads are in a parlous state already and it is plainly stupid to expect that they will cope with more traffic); road safety; general environmental impact and specific flooding issues; pressure on the school Should it be identified that there is a pressing need for further housing within Crudwell Parish, there are several sites which would be more suitable than Ridgeway Farm – the majority of which would be to the East of the A429 or to the South and West of Rommel Lane. Alternatively, leave Crudwell alone and focus on Purton and Lyneham (say) where need seems more logically obvious. No doubt we will get little support if and when the development leads to flooding and loss of property; surely it is only fair and reasonable that any growth in Crudwell is shaped by the local residents who will have to suffer the outcomes in the years following the developer's profits being taken as they sail off into the sunset. I await the outcome of the consultation with great interest and trust that an element of sense will prevail with the 'draft allocation' not fructifying!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2960	Consultee Mr G Wasey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135849	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In short, the previous objections remain entirely relevant. Increasing the village size by 20-25% is ludicrous and will only exacerbate the issues originally raised regarding infrastructure; road usage (the roads are in a parlous state already and it is plainly stupid to expect that they will cope with more traffic); road safety; general environmental impact and specific flooding issues; pressure on the school				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2961	Consultee Mrs Jackie Harvey	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135851		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There appears to have been a lack of consultation with the community in identifying suitable areas, and justification as to why this has been chosen as a suitable area. I recognise the need for additional housing, but not at the cost of protecting village and rural boundaries. In accordance with NPPF para 155, allow residents to engage with the process to identify and select suitable sites. Therefore withdraw the original land (East of Farrels field) until such a time as this has been done. Allowing the development to progress in this location will effectively join Yatton Keynell to neighbouring Tiddlywink and pave the way for further expansive developments.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2962	Consultee Mr G Wasey	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135849	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In short, the previous objections remain entirely relevant. Increasing the village size by 20-25% is ludicrous and will only exacerbate the issues originally raised regarding infrastructure; road usage (the roads are in a parlous state already and it is plainly stupid to expect that they will cope with more traffic); road safety; general environmental impact and specific flooding issues; pressure on the school</p> <p>No doubt we will get little support if and when the development leads to flooding and loss of property; surely it is only fair and reasonable that any growth in Crudwell is shaped by the local residents who will have to suffer the outcomes in the years following the developer's profits being taken as they sail off into the sunset.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2963	Consultee Mr Ian Churchill	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135864	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing as a resident of Tetbury Lane Crudwell to express my concerns at the proposed plan for the development of an additional 40 houses in Crudwell.</p> <p>I am disturbed by the decision to allocate an excessive number of houses to the Crudwell area specifically and the Malmesbury area more generally. There is no justification by Wiltshire Council or government more nationally that this area is one of strategic priority. I am aware that the government recently released a consultation on the "priority" registration areas for housing development; Wiltshire did not feature on that list. Indeed the risk at the moment on the current projections of completed developments in the Crudwell and Malmesbury area, does point towards an oversupply of some 2000 homes when deliverable commitments are taken into account and without considering the impact of windfall developments.</p> <p>The strategic need for this level of development within Crudwell is unproven.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2964	Consultee Mr Ian Churchill Person ID: 1135864	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
Do you consider the draft WHSAP is sound?					
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.13				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Also the plan shows that, unlike other villages, there has been absolutely no consideration of alternate development locations within Crudwell. This location has been driven by a developer with no consultation with the community. Furthermore it goes against the planning department's findings last year that 29 houses at this location was inappropriate – and now a total of over 50 is proposed. The community is in the process of drawing up a local plan and this development should be shelved until this plan has been completed. The only justification so far proposed in the consultation is at 5.111-2 where it is said that the proposed development "would expand the village by a relatively significant extent but would deliver substantial benefits". There appears to be almost no justification for this conclusion in the remainder of the paragraphs, save for the suggestion that a development would support the extension of the local school. Yet as the Local Authority Governor for the school I can categorically state that the school, nor myself as LA liaison, have been consulted as to whether this is to benefit the school. The school's strategic plan does not envisage any increase as there is no teaching space available and more importantly the Victorian school does not have enough communal space for any increase in a site restricted in its development within a conservation area. If any consultation had taken place it would have highlighted that Police are already involved due to traffic-safety issues because of the number of cars coming to the school. This proposed site has no pedestrian access to the school (Tetbury Lane has no footpath to the main road) which will only exacerbate this issue.</p> <p>This is a plan developed without the appropriate consultation – particularly with the school who are ironically being used as the justification! Furthermore to approve a development without having regard to the housing and development plan being prepared by the local community could amount to ignoring very relevant considerations in the decision-making process by the relevant decision-making body. To ignore or fail to take into account the views of the local community, particularly before they have had a view to be properly formalised into a plan which could have a meaningful contribution towards the process which the Council is to determine, would be to deprive the council of vital information. Local views on the impact that a development of this nature would have on flooding, road safety, the education at the local primary school and the community more generally can only improve the judgement of the decision-makers in this process. To fail to wait for such a community plan would also be a kick in the teeth to a local community encouraged by the talk by national and local government of taking a more engaged approach to the views of local communities. Indeed I would go so far as to suggest that no reasonable decision maker would take a decision on development before considering the results of community opinion on future strategic developments in the area. A failure to wait and consider such a plan could exceed the generous ambit of discretion permitted to the decision-maker in this process.</p> <p>It is for those reasons that I would urge the council to consider a pause in the present process to enable any developer to better justify a development in the Crudwell area as one of "priority". Further, or in the alternative it would allow the council the opportunity to be better informed by the views of local people and engage with them in taking forward any development in the most sustainable way.</p>				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	2965	Consultee Mr Ian Churchill	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1135864		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Furthermore it goes against the planning department's findings last year that 29 houses at this location was inappropriate – and now a total of over 50 is proposed.</p> <p>The only justification so far proposed in the consultation is at 5.111-2 where it is said that the proposed development "would expand the village by a relatively significant extent but would deliver substantial benefits". There appears to be almost no justification for this conclusion in the remainder of the paragraphs, save for the suggestion that a development would support the extension of the local school. Yet as the Local Authority Governor for the school I can categorically state that the school, nor myself as LA liaison, have been consulted as to whether this is to benefit the school. The school's strategic plan does not envisage any increase as there is no teaching space available and more importantly the Victorian school does not have enough communal space for any increase in a site restricted in its development within a conservation area. If any consultation had taken place it would have highlighted that Police are already involved due to traffic-safety issues because of the number of cars coming to the school. This proposed site has no pedestrian access to the school (Tetbury Lane has no footpath to the main road) which will only exacerbate this issue.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2966	Consultee Barratt David Wilson Homes Barratt David Wilson Homes	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1135954	Person ID: 556489	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3, para 5.125, table 5.4		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H3 in the Draft Plan allocates sites for housing development in the South Wiltshire Housing Market Area. Figure 5.4 shows that only sites in the Salisbury and Amesbury Community Areas are being allocated. This site is in the Tisbury Community Area. It is just in Wiltshire, with land to the west and south in North Dorset. (See plan)</p> <p>Land beyond the western boundary is the Wincombe Business Park and land to the south received planning permission from North Dorset District Council on 8th June 2016 for 191 dwellings. (see plan)</p> <p>Land east of Littledown (or sometimes referred to as Land east of Wincombe Business Park) Shaftesbury was submitted as a SHLAA site in 2014 to Wiltshire Council (See attached).</p> <p>On 30 March 2015 representations were made to the Informal Consultation on initial site options for this Housing Allocations DPD (See attached). Many of the points made in that representation still apply today</p> <p>A further SHLAA rep was submitted in 2016 (Ref 3446). This time it was shown as part of a larger development taking access from the A350 to the north west. That larger proposal has not gone away and is still being worked up as a longer term proposal. This smaller site is submitted now as it can be delivered in the timeframe of this Housing Site Allocations Plan.</p> <p>The site currently submitted is 7.26 ha in area and is one of the component land parcels making up the 2016 SHLAA submission. Whilst a complete land parcel is submitted, in terms of actual housing development, only a triangular part is potentially developable, as shown on earlier plans, because of the Shaftesbury bypass, which has a land reservation in North Dorset up to the boundary with Wiltshire. The developable area has a potential capacity of 50 – 75 dwellings, as stated previously. The whole land parcel is submitted for allocation to allow flexibility regarding access. Housing development could be accessed from the existing Barratt Homes site to the south, or could also be accessed from a wider allocation of the adjoining land. North Dorset District Council has confirmed Barratt Homes could access more units from the access they already have approval for to the south.</p> <p>Whilst Barratt Homes has planning permission for the land to the south, a start on site has not been made and the current layout could be amended to allow access into the site the subject of these reps.</p> <p>Unfortunately, the Topic Paper covering the Tisbury Community Area seems to completely ignore the fact that this Community Area abuts the market town of Shaftesbury in North Dorset. This is despite the representations previously made by Savills imploring Wiltshire and North Dorset Councils to work together. This omission is an obvious failure in respect of the ‘Duty to Cooperate’ set out in Localism Act 2011’.</p> <p>The Topic Paper divides the Community Area into two - Tisbury and Tisbury CA Remainder. It identifies that 149 dwellings need to be found in Remainder area. Stage 2a of the process gives further consideration of potential sites for assessment. Only SHLAA sites in the immediate vicinity of settlements are considered through the Stage 2a strategic assessment.</p> <p>Large villages, Local Service Centres, Market Towns or Principal Settlements are all identified as areas for consideration for further development. Only large villages are identified in the remainder area however, but no sites in their vicinity are identified as worthy as being taken forward. The conclusion of the report is that no housing sites will be identified for allocation in the Remainder Area.</p>				

	<p>Despite land east of Littledown being submitted as part of previous SHLAA exercises and representations being made to the Initial Consultation on this Allocations Plan, no consideration seems have taken place of this site adjacent to the market town of Shaftesbury where reference is also made to it in North Dorset's Local Plan 2016. This is obviously because the housing needs of Shaftesbury, immediately adjacent to the Wiltshire boundary, have not been taken into account.</p> <p>Planners at North Dorset are also aware of this site and its ability to meet Shaftesbury's housing needs. It was discussed at the Examination into the North Dorset Local Plan in 2015 and meetings subsequently.</p> <p>Paragraph 99 of the Inspector's report for the North District Local in 2015 stated that:</p> <p>Bearing in mind the proposed extension to the plan period , it is also important that the longer-term role of Shaftesbury, particularly in terms of housing provision, is acknowledged. One opportunity may lie on land within the area of Wiltshire Council which is adjacent to the allocation to the south east of Wincombe Business Park. The Council proposes to introduce a reference to this potential future direction of growth. In the circumstances I consider it appropriate that LP1 provides an indication of the Council's future aspirations for the locality. MM16, which encompasses the above points, is recommended accordingly.</p> <p>The Local Plan was modified accordingly.</p> <p>The site is ideal for allocation and with access from the existing housing site to the south, the site could be delivered in the timeframe of this Plan and could provide some of the housing numbers for Tisbury CA remainder area which currently have not been achieved and also meet the housing needs of Shaftesbury.</p> <p>Under the Duty to Cooperate Wiltshire Council and North Dorset District Council should engage to plan for the housing needs of both Councils. Savills has made representations on this matter for the last few years and the matter is highlighted in the North Dorset Local Plan. Unfortunately, to date Wiltshire Council seem to have ignored the issue. This needs rectifying and meaningful discussions are needed between the two councils. This having occurred, this site should be allocated in the Housing Allocations Plan for up to 75 dwellings, taking up some of the Tisbury Remainder housing requirement. This will also help address housing needs in North Dorset where that Council has recently admitted it does not have a five year housing land supply, as required by government guidance.</p>
<p>Attached files (Please see Objective)</p>	<p>4738835 / 4738833 / 4738837 / 4738836 / 4738838</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To deal with any questions from the Inspector and to emphasise the lack of meaningful cooperation between Wiltshire and North Dorset to date and therefore failure under the Duty to Cooperate.</p>

Comment ID:	2967	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We note within the text of many of the proposed site allocations that the need for Drainage Strategies is stated. It is recommended that this requirement is included in each of the Housing Site Allocation policies, so that it is clearer for developers on what is required.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2968	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Consideration for climate change must be taken into account when allocating development. Appropriate buffer strips, where there is no built development, should be placed adjacent to any Flood Zones 2 or 3 in sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2969	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Natural Flood Management (upstream thinking / slowing the flow / Sustainable Drainage Systems (SUDS)) should be incorporated in any planning proposals to mitigate impact of a reduce risk of flooding to any new, but also existing developments.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2970	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Selection Process Methodology'			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We note the supporting documentation 'Site Selection Process Methodology' includes within the 'exclusionary criteria' the following question:- 'Is the site fully or partly within flood risk areas, zones 2 or 3?' Moreover, Strategic Housing Land Availability Assessment (SHLAA) sites are rejected from further consideration or their capacity reduced where affected by obstacles to development such as floodplain. This approach to the exclusionary criteria is welcomed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2971	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Proposed allocations within hampshire Avon catchment and associated evidence base		Effective	Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We consider the plan to be unsound because there is insufficient certainty and information provided in the evidence documents and plan relating to nutrient management issues and the proposed growth given in the Wiltshire Housing Site Allocations Plan. There is therefore uncertainty on the potential impact to the designated Hampshire Avon Special Area of Conservation (SAC), which is located in the vicinity of some of the proposed allocations.</p> <p>The River Avon NMP has been produced to assess the impact of forecast growth and other pressures in order to achieve compliance with the Habitats Directive and facilitate development without affecting the integrity of the River Avon SAC. This is to help reduce and manage phosphorus levels in the Hampshire Avon Special Area of Conservation (SAC), in accordance with international obligations, principally in the EU Habitats, Wild Birds and Water Framework Directives. It also aids development and change in the Hampshire Avon catchment by ensuring the amount of phosphorus in the river does not increase and conflict with the conservation objectives for the SAC.</p> <p>At the current time it is not clear whether the proposed Wiltshire Housing Site Allocations Plan development is within the growth forecast considered as part of the River Avon NMP. If evidence shows that growth will exceed the NMP forecast targets, then specific mitigation will need to be identified as part of the Allocations Plan unless risk assessment confirms that this is not required. Therefore the deliverability of some of the proposed allocations is not certain.</p> <p>In order to make the plan sound Wiltshire Council should adequately demonstrate that proposed development will connect to sewage treatment works with Phosphorus stripping and that the development is within the growth forecast considered as part of the Hampshire Avon Nutrient Management Plan (NMP). If evidence shows that growth will exceed the NMP forecast targets, then specific mitigation will need to be identified as part of the Allocations Plan. Alternatively a risk assessment would need to be undertaken and demonstrate why this mitigation may not be required. At the current time it is not clear if this is the case and Wiltshire Council should present this data to assist in auditing of the plan.</p> <p>Stronger linkages should be given in the Wiltshire Housing Allocations Plan to Annex 2 of the Hampshire Avon NMP, which is currently being drafted by Wiltshire Council in liaison with the Environment Agency and Natural England. Annex 2 should provide more detail of any required mitigation, including consideration of any required flexibility for future scenarios over the lifetime of the Allocations Plan. This flexibility should include any potential outcomes from the review of the NMP. It would be recommended that a policy(s) is included in the Allocations Plan to ensure development addresses nutrients issues, such as a need to implement any requirements that may be highlighted in Annex 2 of the NMP.</p> <p>Habitats Regulations Assessment</p> <p>From reviewing the Wiltshire Housing Site Allocations Plan and the associated Habitats Regulation Assessments (HRA) our comments relating to nutrient management are as follow:</p> <p>The Habitats Regulations Assessment may need to be reviewed following completion of Environment Agency and Natural England consent order investigations in March 2019.</p>			

	<p>If offsetting of Codford and or Heytesbury Development Phosphorus loading cannot be achieved or any development connected to sewage treatment works (STW) with Phosphorus removal, Wiltshire Council's proposal to remove these sites from the development plan would meet criteria set out in the Hampshire Avon Nutrient Management Plan (NMP).</p> <p>The Environment Agency would not object from a nutrient management point of view to development that take place which will connect to STW with P stripping and where this development is within the growth forecast considered as part of the NMP and where the STW has sufficient headroom to accept such growth. It is not clear if this is the case and Wiltshire should present this data to assist in auditing of the plan.</p> <p>As outlined in "conclusions on the integrity test" (page 59 onwards of the HRA) Wiltshire Council's Offsetting P loading from development (NMP Annex 2) will be required to identify if and where Wiltshire Site Allocations Plan growth will exceed the growth considered within the Avon NMP and or existing STW permit headroom. Where this occurs Wiltshire Council will need to assess the impact this may have on achieving Habitats Directive objectives and offset any additional P load (above that considered acceptable within the NMP) may be required.</p> <p>We understand any increased phosphorus loading resulting from Salisbury Plain Army re-basing will be offset through catchment management across the Hampshire Avon catchment. This will need to continue indefinitely or until permanent measures are put in place. The growth forecast from the MoD should however be included within Wiltshire Council's risk assessment to be considered as part of River Avon NMP Annex 2 calculations.</p> <p>Water Resources</p> <p>Wessex Water Supply Grid (being installed by Wessex Water in 2018), will help to reduce the impact of water supplies to development within the Hampshire Avon. Wessex Water shall need to confirm they can supply such water within permitted headroom and without causing unfavourable condition to Habitats Directive sites.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>If our issues raised above cannot be addressed prior to the Examination, we would wish to attend any relevant examination Hearings that may be set up to discuss these issues.</p>

Comment ID:	2972	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	With regard to other environmental issues, we are satisfied with the plan provided the following are addressed at each of the sites: Built development would only be in Flood Zone 1. If any sites have Flood Zone 2 or 3 within the boundary, then a Sequential Approach must be taken, to ensure any development is only in FZ1. This must take into the potential effects of climate change. For sites in groundwater Source Protection Zone 1 (SPZ1) – there must be no discharges to ground other than clean surface water.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2973	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Groundwater Protection A number of the allocations are within source protection zones, some of the locations are clearly within the inner, SPZ1, zones. There are rarely any absolute constraints to housing development concerning SPZs. However there are constraints regarding the disposal of both surface water and sewage with SPZs. It is therefore important that Wiltshire Council identify where SPZs are and their status and additionally that they review the Environment Agency's groundwater protection policy and ensure that all of the proposed activities associated with these sites, i.e. disposal of surface water are compliant with this policy, which can be found here: https://www.gov.uk/government/collections/groundwater-protection</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2974	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The possibility that the site allocations previous uses could have given rise to contamination should not be discounted at this stage. It is therefore important that any planning application is supported by an appropriate contaminated land desk study where sites are other than 'green field'. Desk studies should identify any potential risks, this will enable the Environment Agency and Wiltshire Council's own contaminated land experts to recommend appropriate conditions.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2975	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Biodiversity On reviewing the boundary changes to those sites, it would seem the changes are mostly small with many boundaries being pulled back from watercourses which is beneficial. One settlement that does seem to have significantly changed is that of Westbury where a new area has been included to the north-west of the town. This area has the River Biss along its western edge and we would advise any development is kept at least 8m from the watercourse corridor to preserve its function as a wildlife route.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2976	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.3 Southcliffe			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. EA constraint: Flood zone 1. Very small amount of surface water flooding mapped on this site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2977	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. EA Constraint: Flood Zone 1. Some surface water flooding mapped on this site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2978	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.4 East of Lavington School			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. EA Constraint: Flood Zone 1.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2979	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.1 Empress Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. EA Constraint: Flood Zone 1				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2980	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.11 The Street, Hullavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Only clean and uncontaminated surface water should discharge into the site, particularly where the SPZ1 is located. Sustainable Drainage Systems are encouraged but should be designed to avoid pollution of groundwater. Foul drainage should go to a mains foul sewer where possible.</p> <p>Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation.</p> <p>EA constraints: Flood Zone 1 Groundwater Source Projection Zone 1 covers part of the site, SPZ2 is across the majority of the site. Site adjacent to an ordinary watercourse.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2981	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. EA constraint: Flood Zone 1 Groundwater Source Projection Zone 2 across the entire site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2982	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. EA Constraints: Flood Zone 1. Groundwater Source Projection Zone 1 across the entire site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2983	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1 Elm Grove Farm			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, including relating to the ordinary watercourse within the site, which should be taken into account when considering this allocation.</p> <p>EA constraints: Flood Zone 1 Ordinary watercourse running through and adjacent the site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2984	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Provided sequential approach within the site is applied, and development only takes place in FZ 1 then we have no objection to this allocation. Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation.</p> <p>EA constraint: Flood Zone 2 and 3 in part of site. Main river (Lambrok Stream) adjacent site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2985	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.5 Upper Studley			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Provided sequential approach within the site is applied, and development only takes place in FZ 1 then we have no objection to this allocation. Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. In addition, any potential contamination from the historic landfill will need to be taken into account for this site. EA constraints: Flood Zone 2 and 3 in part of site. Main river (Lambrok Stream) adjacent site. Historic landfill in /adjacent the north part of the site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2986	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off of the A363 at White Horse Business Park, Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. EA constraints: Flood Zone 1 / Part of site at risk of surface water flooding.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2987	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Provided sequential approach within the site is applied, and development only takes place in FZ 1 then we have no objection to this allocation. An undeveloped buffer should also be left along the edge of the site and the indicative FZ2/3. However, flood risk should be assessed as part of the site allocation process and be taken into account when considering taking this site forward.</p> <p>The Lead Local Flood Authority, (LLFA) Wiltshire Council should be consulted about this proposed site, as they may have information on other sources of flooding, which should be taken into account when considering this allocation.</p> <p>The development would need to enhance the Lambrok Stream corridor to improve habitat for biodiversity. Development will need to consider the presence of water voles, a protected species.</p> <p>EA constraints: Flood Zone 2 and 3 associated with the main river (Lambrok Stream) runs through the middle of the site. Some other areas of the site also are shown at risk of surface water flooding.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2988	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.3 Elizabeth Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, including relating to the ordinary watercourse within the site, which should be taken into account when considering this allocation. EA constraints: Flood Zone 1 Ordinary watercourse running through site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2989	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7 East of the Dene, Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. Measures must be put in place to ensure River Wylye SAC and SSSI is not impacted by the development. All development projects should seek to enhance the natural and local environment. EA constraints: Flood zone 1				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2990	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.8 Bore Hill, Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. In addition the allocation proposals should take into account any issues associated with the waste management facility within the site boundary. Measures must be put in place to ensure River Wylye SAC and SSSI is not impacted by the development. All development projects should seek to enhance the natural and local environment. EA constraint: Flood Zone 1 Waste Management Licensed facility – Bore Hill Farm, Biodigester Facility				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2991	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.9 Boreham Road, Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Provided sequential approach within the site is applied, and development only takes place in FZ 1 then we have no objection to this allocation. This site has been the subject of a couple of recent planning applications. We have not objected to the proposals subject to the submitted site layout plans ensuring no development in Flood Zones 3 & 2 (site specific sequential approach) and provision of an appropriate clear buffer strip between top of bank of main river and the ordinary watercourse. Usual other conditions would also apply e.g. minimum finished floor level (FFL). Wiltshire Council as Lead Local Flood Authority (LLFA) should comment on surface water drainage. Measures must be put in place to ensure River Wylde SAC and SSSI is not impacted by the development. An appropriate natural buffer zone should be incorporated into the design. All development projects should seek to enhance the natural and local environment. EA constraints: Edges of site in Flood Zone 2 and 3, including adjacent access roads. River Avon SAC, SSSI runs adjacent to the site.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2992	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10 Barthers Farm Nurseries, Chapmanslade			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. EA Constraints: Flood Zone 1				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2993	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14 Court Orchard/ Cassways, Bratton			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council).</p> <p>Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation.</p> <p>EA constraints: Flood Zone 1.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2994	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.5 Clover Lane, Durrington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. The site is in Source Protection Zone 2, so particularly care will need to be taken with the design of any Sustainable Drainage Systems. Only clean and uncontaminated surface water should discharge into the site. Sustainable Drainage Systems are encouraged but should be designed to avoid pollution of groundwater. Foul drainage should go to a mains foul sewer where possible. Measures must be put in place to ensure River Avon SAC and SSSI is not impacted by the development. All development projects should seek to enhance the natural and local environment.</p> <p>EA constraints: Flood Zone 1. Small area of site at risk of surface water flooding. Groundwater Source Protection Zone 2</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2995	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.6 Land off Larkhill Road			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The map of Durrington provided does not show the whole of the site area; part of the south part of the site is missing, which falls in FZ2 and FZ3. Therefore we are not sure of the extent of the site and there appears to be some confusion in the documentation. In one place it states that site 3179 could deliver 143 dwellings, in another place it says it could deliver 15 dwellings.</p> <p>We would have no objection to the site allocation if it falls wholly in FZ1. However, if the site actually extends to FZ 3 & 2, then provided a sequential approach within the site is applied and development only takes place in FZ 1, then we have no objection to this allocation.</p> <p>An undeveloped buffer should be left along the edge of the site and the indicative FZ2/3.</p> <p>Flood risk should be assessed as part of the site allocation process, and be taken into account when considering taking this site forward.</p> <p>The Lead Local Flood Authority, (LLFA) Wiltshire Council should be consulted about this proposed site, as they may have information on other sources of flooding, which should be taken into account when considering this allocation.</p> <p>There must be no discharge of sewage effluent into the ground at this site as the site falls in SPZ1. The development must be connected to a mains foul sewer.</p> <p>Measures must be put in place to ensure the River Avon SAC and SSSI is not impacted by the development. All development projects should seek to enhance the natural and local environment.</p> <p>EA constraints: Flood Zone 2 and 3 across southern part of site. Main river (Hampshire Avon) runs in/ near south of site, which is an SAC/SSSI.</p> <p>Groundwater Source Protection Zone 1</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2996	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Land at Netherhampton Road. S1028			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation. Measures must be put in place to ensure River Nadder SAC and SSSI is not impacted by the development. In addition, local wildlife sites lie close to the proposed development, including Fitzgerald farm meadows, Bemerton meadows east and Harnham slope. These should be taken into account when determining any potential impacts from the development. All development projects should seek to enhance the natural and local environment. EA constraints: Flood Zone 1. West Harnham Chalk Pit SSSI located to the east of the site.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2997	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.2 Land at Hilltop Way			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2998	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 Netherhampton Road Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>No objection to this allocation provided a sequential approach within the site is applied, and development only takes place in FZ 1. An adequate no development buffer must be left between built development and the adjacent FZ2, to take into account any climate change water level increases.</p> <p>The Lead Local Flood Authority (LLFA)/Drainage Authority (Wiltshire Council) may have information on other sources of flooding, which should be taken into account when considering this allocation.</p> <p>Local wildlife sites lie close to the proposed development, including Fitzgerald farm meadows and Bemerton meadows east. These should be taken into account when determining any potential impacts from the development.</p> <p>Measures must be put in place to ensure River Nadder SAC and SSSI is not impacted by the development. All development projects should seek to enhance the natural and local environment.</p> <p>EA constraints: Flood Zone 1, however boundary adjacent to FZ2. Part of site at risk of surface water flooding.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	2999	Consultee Miss Katherine Burt Sustainable Places - Planning Specialist	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Environment Agency (Wessex Area) Person ID: 395940		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4 Rowbarrow			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No objection in principle to this proposed site allocation, subject to comments from Drainage Authority (Wiltshire Council). Drainage Authority may have information on other sources of flooding, which should be taken into account when considering this allocation.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3000	Consultee Minton Group Ltd Person ID: 1136804	Agent Ms Emily Penkett Hunter Page Planning Person ID: 1138276	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Omission site - Land adjacent to Waitrose, Malmesbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We write to you to make representation on behalf of our client, Minton Group Ltd, regarding the Wiltshire Housing Site Allocations Plan: Pre-submission draft plan. This submission relates specifically to land at Malmesbury adjoining Waitrose to the west of the A429. A site location plan is attached for your reference which sets out the site and its developable area (see Appendix 1). [see attached]</p> <p>At present, the site to the west of the A429 lies adjacent to the existing settlement boundary to the north and west.</p> <p>The site and surroundings</p> <p>To the north, the site is contained by the River Avon with residential development beyond, defining the natural boundary of the site. To the east lies the A429 a key transport route running from Chippenham to Coventry and beyond that agricultural land. The western boundary of the site is also defined by the River Avon with further residential development beyond. To the south lies the Malmesbury Bypass Waitrose store which was completed in 2014. By virtue of the site's enclosure by development to the north, south and west, but also its distinct physical separation from the agricultural land to the east by the A429, the site is considered to be well enclosed and more in character with the land within the settlement boundary, rather than open landscape to the east.</p> <p>Constraints</p> <p>The site is not subject to any environmental or landscape designations. Due to the sites shared boundaries with the River Avon, as identified by the Environment Agency's Flood data mapping part of the site falls into flood zone 3. However, this area has been excluded from the developable area. It also lies within the Malmesbury Conservation Area but there are no listed buildings within the immediate vicinity of the site. The developable area of our client's site is therefore free from constraints and barriers to development.</p> <p>Sustainability</p> <p>Policy CP1 of the adopted Core Strategy identifies four tiers of settlements namely Principle Settlements, Market Towns, Local Service Centres and Large and Small Villages. Malmesbury is identified as a Market Town (second tier settlement) in the settlement hierarchy. The Policy highlights that Market Towns are settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. 'Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self-containment and viable sustainable communities.' Malmesbury already holds a wide range of community facilities. As such, there is less reliance upon the need to travel to meet the day to day needs of residents, other than for some employment purposes.</p> <p>The high street is within walking distance of the site which contains local amenities such as a food store, pharmacy, several public houses, bank and hairdressers. There is also a primary school, primary care centre and a range of recreational and leisure facilities within close proximity to the site. Bus stops are also located within walking distance of the site offering frequent services within the local area and to surrounding settlements such as Swindon, Bath and Cirencester. As such, the site is considered to be a sustainable site that could link well to other sites within the settlement.</p>				

	<p>Status of the Land The National Planning Policy Framework states that for sites to be considered 'deliverable' means they will be available now, in a suitable location now and achievable within five years and viable, as per footnote 11 of paragraph 47.</p> <p>Available The site is in single ownership, and is being promoted by the landowner. There are no legal or ownership problems which could limit development. It can, therefore, be considered to be available now.</p> <p>Suitable The site is suitably and sustainably located for development with good accessibility to local services, as identified in the above Sustainability section of this document. There are no physical constraints that would prevent or delay development coming forward on the developable area of the site.</p> <p>The area immediately adjacent to the south of the site hosts a Waitrose food store comprising commercial/retail space with residential development located further beyond this. As such, the site is clearly located in a sustainable location suitable for employment led development given the surrounding compatible land uses.</p> <p>Achievable This site is located within a location that developers find attractive to bring forward for development given that Malmesbury is a sustainable Market Town.</p> <p>Conclusion Our client's site is located in a sustainable location, there are no constraints on the developable area of the site and it would logically follow on from the existing development surrounding the site. In conclusion, it is considered that there is no principle reason for the land adjacent to the Waitrose Site to be omitted from the revised settlement boundary as it would provide an appropriate and defensible boundary to the urban edge in this location.</p>
Attached files (Please see Objective)	4769575
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3001	Consultee Minton Group Ltd	Agent Ms Emily Penkett Hunter Page Planning	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136804	Person ID: 1138276	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.33 Malmesbury SBR			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Allocations Plan includes a review of the Settlement Boundaries within the area and the Settlement Boundary in Malmesbury has been amended to include the Waitrose land to the south. However, it is considered that the site adjoining Waitrose should also be included within the Settlement Boundary in order to present a more logical boundary (see Appendix 2). [see attached]. This is considered further below.</p> <p>Revision of boundary at adjacent Waitrose Site</p> <p>I note specifically that there is a proposed settlement boundary change to include the adjacent Waitrose Site at land to the rear of Avon Mills. This is because it is a built planning permission for employment use which is physically/functionally related to the settlement. However, this results in an awkward and illogical settlement boundary. The subject site which is adjacent to the Waitrose site is also well related to the settlement and its inclusion within the settlement boundary would represent the logical “rounding off” to this area of the settlement. It is of note that the Waitrose site is of little discernible difference in terms of landscape character or appearance when compared to the adjacent subject site. Furthermore, in terms of historic sensitivity, the Waitrose site it is in closer proximity to the Grade II listed St John’s Bridge and Avon Mills, whereas the adjacent subject site has no listed buildings within its immediate vicinity. Furthermore, our client’s site is visually and functionally contained by the River Avon to the north and west, built development to the south and the A429 to the east. Looking at the line of the proposed settlement boundary at the Waitrose site, it is concluded it should also be extended for the adjacent subject site. This would create a logical extension to the urban edge within the defined settlement boundary.</p> <p>Conclusion Our client’s site is located in a sustainable location, there are no constraints on the developable area of the site and it would logically follow on from the existing development surrounding the site. In conclusion, it is considered that there is no principle reason for the land adjacent to the Waitrose Site to be omitted from the revised settlement boundary as it would provide an appropriate and defensible boundary to the urban edge in this location.</p>				
Attached files (Please see Objective)	4769583				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3002	Consultee Bovis Homes Bovis Homes Person ID: 998345	Agent Jon Waite Senior Planner Carter Jonas LLP incorporating Kemp and Kemp Person ID: 1136047	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1.1. This representation is made in response to the Wiltshire Housing Site Allocations Plan - Pre-submission Draft Plan (“the Draft Plan”) consultation and is submitted on behalf of our client Bovis Homes (“Bovis”). Bovis have an interest in Land at Swan Road, Pewsey.</p> <p>1.2. Bovis have a number of concerns with the Draft Plan. These are set out below.</p> <p>1.3. Appendix1 of this representation is a ‘Vision Document’ prepared for Bovis and provides details on how the site could be comprehensively developed for a sustainable new neighbourhood at Pewsey.</p> <p>1.4. On a separate but related matter, the majority of the site appears in the Council’s Strategic Housing Land Availability Assessment (SHLAA - site references 1072 and 1083). Bovis would respectfully ask the Council to accept this ‘Vision Document’ to update its SHLAA tables.</p> <p>2. Background</p> <p>2.1. The Wiltshire Core Strategy was adopted in January 2015. Core Policy 1 sets out the district’s settlement strategy and identifies Pewsey as a ‘Local Service Centre’ meaning it is one of the more sustainable settlements in the district. The Core Strategy splits Wiltshire into a number of ‘Community Areas’. The settlement of Pewsey sits within the Pewsey Community Area.</p> <p>3. The Wiltshire Housing Site Allocation Plan</p> <p>3.1. As stated above, the Core Strategy (and consequently this Draft Plan) covers the period 2006 – 2026. Paragraph 47 of the National Planning Policy Framework states that to boost significantly the supply of housing, local planning authorities should: “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;”</p> <p>3.2. According to the Council’s Local Development Scheme, the Draft Plan is not expected to be adopted until September 2018. At best, this will mean a deliverable housing supply of 7.5 years. This is some way off the NPPF requirement identified above and does not help ‘boost significantly the supply of housing’. It is inevitable that this will be of concern to the Inspector examining the Draft Plan.</p> <p>3.3. Bovis also note that in finding the Core Strategy sound, the Inspector for the strategy’s Examination in Public was clear that his decision was based on the premise that there would be an early review of the plan. Paragraph 20 of the Inspector’s report states: “Indeed, the Council has clarified that it will be undertaking a planned early review of the core strategy to ensure ‘the development provision looks to an appropriately long term end date’ which will be supported by an updated Strategic Housing Market Assessment (SHMA).”</p> <p>3.4. Furthermore, paragraph 81 of the Inspector’s report states that: “Indeed, I am particularly mindful that the Council intends to produce a new HMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes. Consequently I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more.”</p> <p>3.5. Additionally, the Inspector referenced the need for flexibility in the Core Strategy to deliver more homes and the Draft Plan does not provide this; it offers a ‘do minimum’ approach. Bovis consider that housing targets should be treated as a minimum and planned to be</p>				

	<p>exceeded. As such, Bovis suggest that as a minimum there are a suite of 'reserve sites' allocated within each Community Area to address any shortfall in housing delivery. Land at Swan Road, Pewsey (see below) could be a suitable reserve allocation site.</p> <p>3.6. To ensure much needed housing is provided, all Community Areas within the District should include allocated and reserve sites, in appropriate sustainable locations. It would be incorrect to merely assume that a whole area (such as the Pewsey Community Area) will need no further growth.</p> <p>3.7. Notwithstanding the points above, the Council carried out a consultation on the scope of its partial review of the Wiltshire Core Strategy during April / May 2015. With reference to the partial review, the Council's website states: "We anticipate that a draft policy document showing changes to the WCS will be published for consultation in July 2015 together with proposed amendments to the policies map (pre-submission consultation). Following the pre- submission consultation, we anticipate that the partial review will be submitted for examination in December 2015."</p> <p>3.8. This timetable has not come to fruition. In fact the Council appears to have carried out very little, if any, further work on this important partial review of its Core Strategy. The NPPF is clear at paragraph 47 that local authorities should be planning to meet the full, objectively assessed needs for market and affordable housing in the housing market area. The Council is not currently fulfilling this duty.</p> <p>3.9. It is clear from the above that the Council is pressing ahead with a Draft Plan that is based on old and outdated housing targets. Moreover, considering the Inspector's report quoted above, the Council is not working to the Inspector's agreed and expected time frame.</p> <p>3.10. It is Bovis' view therefore that this Draft Plan should in fact be a joint Core Strategy Partial Review and Housing Site Allocations Plan. This will ensure that: A supply of specific, developable sites is provided for years 6-10 and for years 11-15. It is based on an up-to-date SHMA identifying a true, objectively assessed, housing need. The Council is working closer to the timeframe identified by the Inspector in implementing the findings of the new SHMA.</p> <p>3.11. As a point of note, it is Bovis' understanding that a Joint SHMA has been undertaken, between Wiltshire and Swindon and was concluded earlier this year. However it has not, to Bovis' knowledge, ever been published, or the results made publically available. In the interests of openness and transparency, the Joint SHMA results should be published and taken into consideration for the joint Plan's strategy for growth and allocations.</p> <p>3.12. If the Council finds it does require additional allocations for this joint Plan, Bovis would ask it to consider further its site; Land at Swan Road, Pewsey.</p> <p>3.13. Bovis are aware that there is a Pewsey Neighbourhood Plan in place but believe that a strategic allocation of this nature should appear in the Council's Local Plan.</p>
Attached files (Please see Objective)	4737862
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3003	Consultee Bovis Homes Bovis Homes Person ID: 998345	Agent Jon Waite Senior Planner Carter Jonas LLP incorporating Kemp and Kemp Person ID: 1136047	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	Settlement boundary review				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>4. Proposed Settlement Boundary</p> <p>4.1. As well as identifying housing allocations, the draft Plan has amended a number of settlement boundaries. Objective 1 of the draft Plan is: “To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages”</p> <p>4.2. The Council has also published a separate ‘Topic Paper: Settlement Boundary Review Methodology’. Table 8.1 of the Topic Paper sets out areas which have been included and excluded in the new boundaries: Included – “Built and commenced residential and community facilities development such as religious buildings schools and community halls, that is physically related to the settlement. Built and commenced employment development in principal settlements, market towns and local service centres that is physically related to the settlement. The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location Recreational or amenity space at the edge of a settlement that relates more closely to the built environment” Excluded Employment development, farm buildings and farmyards, at the edge of large villages. Isolated development that is physically detached from the settlement (including farm buildings or agricultural buildings and renewable energy installations). The extended curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location. Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside. All types of unimplemented planning permission. Site allocations.</p> <p>4.3. Bovis note that there is no new proposed boundary for Pewsey. This is considered a short-sighted and damaging strategy for the Council.</p> <p>4.4. Through the partial review of the Core Strategy (based on a more realistic housing need), it is likely that further housing sites will be required by the Council. As such, it should be taking this opportunity to provide further directions for growth in sustainable locations, not reduce its options.</p>				

	4.5 It is Bovis' view that the settlement boundary review should form part of a combined Core Strategy Partial Review and Housing Site Allocations Plan with housing allocation sites included in the revised boundaries. This will help ensure the delivery of the allocation and offer greater certainty to communities.
Attached files (Please see Objective)	4737862
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3004	Consultee Bovis Homes Bovis Homes Person ID: 998345	Agent Jon Waite Senior Planner Carter Jonas LLP incorporating Kemp and Kemp Person ID: 1136047	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5. Land at Swan Road, Pewsey</p> <p>5.1. The site extends to approximately 29.05 hectares (ha) and is currently in agricultural use. It is located at the south western fringe of Pewsey, approximately 800m from the village centre.</p> <p>5.2. It is located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). However, the Council's Strategic Housing Land Availability Assessment (SHLAA) which assesses the suitability, availability and deliverability of sites states that the site is 'suitable' for development. Furthermore, Bovis is committed to delivering a development, which minimises any impact on the landscape and provides appropriate mitigation measures such as planting where required. A comprehensive Landscape Assessment would form part of any planning application. There are no other national designations adjacent or within any part of the site, nor are there any designated heritage assets.</p> <p>5.3. The site is not covered by any international or national statutory designations. However, within 10km of the site, there are three internationally important designated sites, namely Pewsey Downs Special Area of Conservation (SAC), Salisbury Plain SAC/ SPA and the River Avon SAC. Any potential impacts on these sites would be considered through the planning application process and if required, mitigation would form part of the proposal.</p> <p>5.4. The attached 'Vision Document' explains that access to the site is proposed via primary access points onto Swan Road to the east of the site and the A345 Salisbury Road to the south of the site. A further access point could also be provided on Swan Road opposite the existing Esso petrol station.</p> <p>5.5. Swan Road is subject to a 30mph speed limit and Salisbury Road is subject to a 50mph speed limit. The 30mph speed limit could be extended past the site on Salisbury Road, if considered necessary. It is likely that a gateway feature or sequence of features would be provided on Salisbury Road, to provide an element of traffic calming and management.</p> <p>5.6. In terms of connectivity, there are existing local pedestrian routes which connect the site to the village centre and Pewsey Railway Station. Pedestrian or cycle links could be provided to the north towards the village centre to connect to existing public rights of way. It is proposed that the existing public right of way would be retained within the development and the possibility of improvements would be explored.</p> <p>5.7. There are also bus stops close to the site on Swan Road and Salisbury Road which offer regular peak and off -peak services to Swindon, Marlborough and Salisbury.</p> <p>6. Conclusion</p> <p>6.1. The housing targets in the Pre-submission Wiltshire Housing Site Allocation Plan are in-line with Council's adopted Core Strategy 2015. The draft Plan is expected to be adopted in September 2018 (some 3 years after the adoption of the Core Strategy).</p> <p>6.2. There is insufficient flexibility in the Draft Plan. If the Council is to continue its current strategy, it should be allocating reserve sites in all Community Areas to ensure housing delivery.</p>				

	<p>6.3. The Inspector found the Core Strategy sound on the basis that there would be an early review of the strategy based on an up-to-date SHMA (the Inspector's Report referred to a new SHMA in early 2016). To date this has not happened.</p> <p>6.4. Bovis therefore believe that the Council should now be preparing a joint Core Strategy Partial Review and Housing Site Allocations Plan to ensure it has a 6-10 year and an 11-15 year housing supply (as required by the NPPF) based on an up-to-date need.</p> <p>6.5. The drawing of new settlement boundaries should form part of the joint Core Strategy Partial Review and Housing Site Allocations Plan process and include the new housing allocations. This will ensure their delivery and provide certainty for local communities.</p> <p>6.6 The attached 'Vision Document' provides details on how Land at Swan Road, Pewsey could be comprehensively developed for a sustainable new neighbourhood to the settlement.</p>
Attached files (Please see Objective)	4737862
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3005	Consultee Nick Hardcastle Leda Properties Ltd Person ID: 840643	Agent Mr Steven Sensecall Partner Carter Jonas LLP incorporating Kemp and Kemp Person ID: 646956	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Introduction</p> <p>1.1. This representation is made in response to the Wiltshire Housing Site Allocations Plan – Pre-submission Draft Plan (“the draft Plan”) consultation and is submitted on behalf of our client Leda Properties (“Leda”). Leda are the owners of Land at Marsh Farm, Royal Wootton Bassett (RWB). An outline of the site is shown at Appendix1 of this representation.</p> <p>1.2. Leda have a number of concerns with the draft Plan which are set out below.</p> <p>2. Background</p> <p>2.1. The Wiltshire Core Strategy was adopted in January 2015. Core Policy 1 sets out the district’s settlement strategy and identifies RWB as a market town meaning it is one of the more sustainable settlement in the district. The Core Strategy splits Wiltshire into a number of ‘Community Areas’. RWB sits within the Royal Wootton Bassett and Cricklade Community Area.</p> <p>2.2. Table 1 on page 48 of the Core Strategy shows an indicative requirement during the Core Strategy period (2006 – 2026) of 1,455 new dwellings for the Royal Wootton Bassett and Cricklade Community Area. These are to be delivered through the planning application process, Neighbourhood Plans and this draft Plan.</p> <p>3. The Wiltshire Housing Site Allocation Plan</p> <p>3.1. As stated above, the Core Strategy (and consequently this draft Plan) covers the period 2006 – 2026. Paragraph 47 of the National Planning Policy Framework states that to boost significantly the supply of housing, local planning authorities should: “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;”</p> <p>3.2. According to the Council’s Local Development Scheme, the draft Plan is not expected to be adopted until September 2018. At best, this will mean a deliverable housing supply of 7.5 years. This is some way from the NPPF requirement identified above and does not help ‘boost significantly the supply of housing’. It is inevitable that this will be of concern to the Inspector examining the draft Plan.</p> <p>3.3. Leda also note that in finding the Core Strategy sound, the Inspector for the plan’s Examination in Public was clear that his decision was based on the premise that there would be an early review of the plan. Paragraph 20 of the Inspector’s report states: “Indeed, the Council has clarified that it will be undertaking a planned early review of the core strategy to ensure ‘the development provision looks to an appropriately long term end date’ which will be supported by an updated Strategic Housing Market Assessment (SHMA).”</p> <p>3.4. Furthermore, paragraph 81 of the Inspector’s report states that: “Indeed, I am particularly mindful that the Council intends to produce a new SHMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes. Consequently I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more.”</p>				

	<p>3.5. The Council carried out a consultation on the scope of the partial review of Wiltshire Core Strategy during April / May 2015. With reference to the partial review, the Council's website states: "We anticipate that a draft policy document showing changes to the WCS will be published for consultation in July 2015 together with proposed amendments to the policies map (pre-submission consultation). Following the pre- submission consultation, we anticipate that the partial review will be submitted for examination in December 2015."</p> <p>3.6. This timetable has not come to fruition. In fact the Council appears to have carried out very little, if any, further work on this important partial review of its Core Strategy. The NPPF is clear at paragraph 47 that local authorities should be planning to meet the full, objectively assessed needs for market and affordable housing in the housing market area. The Council is not currently fulfilling this duty.</p> <p>3.7. It is clear from the above that the Council is pressing ahead with a draft Plan that is based on old and outdated housing targets. Moreover, considering the Inspector's report quoted above, the Council is not working to the Inspector's agreed and expected time frame.</p> <p>3.8. It is Leda's view therefore that this draft Plan should in fact be a joint Core Strategy Partial Review and Housing Site Allocations Plan. This will ensure that: A supply of specific, developable sites is provided for years 6-10 and for years 11-15. It is based on an up-to-date SHMA identifying a true, objectively assessed, housing need. The Council is working closer to the timeframe identified by the Inspector in implementing the findings of the new SHMA.</p> <p>3.9. If the Council finds it does require additional allocations for this joint Plan, Leda would ask it to consider further its site Land at Marsh Farm, Royal Wootton Bassett.</p>
Attached files (Please see Objective)	4737954
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3006	Consultee Nick Hardcastle Leda Properties Ltd Person ID: 840643	Agent Mr Steven Sensecall Partner Carter Jonas LLP incorporating Kemp and Kemp Person ID: 646956	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.44				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Proposed Settlement Boundary</p> <p>1.1. As well as identifying housing allocations, the draft Plan has amended a number of settlement boundaries. Objective 1 of the draft Plan is: “To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages”</p> <p>1.2. The Council has also published a separate ‘Topic Paper: Settlement Boundary Review Methodology’. Table 8.1 of the Topic Paper sets out areas which have been included and excluded in the new boundaries: Included – “Built and commenced residential and community facilities development such as religious buildings schools and community halls, that is physically related to the settlement. Built and commenced employment development in principal settlements, market towns and local service centres that is physically related to the settlement. The curtilage of a property that relates more closely to the built environment (e.g. a garden) or has limited capacity to extend the built form of the settlement in terms of scale and location Recreational or amenity space at the edge of a settlement that relates more closely to the built environment” Excluded Employment development, farm buildings and farmyards, at the edge of large villages. Isolated development that is physically detached from the settlement (including farm buildings or agricultural buildings and renewable energy installations). The extended curtilage of a property that relates more closely to the open countryside (e.g. a field or paddock) or has the capacity to substantially extend the built form of the settlement in terms of scale and location. Recreational or amenity space at the edge of the settlement that relates more closely to the open countryside. All types of unimplemented planning permission. Site allocations.</p> <p>1.3. Leda note the proposed new boundary for RWB on page 132 of the draft Plan. This new boundary is drawn even tighter to the existing built development and dramatically restricts any further growth of the town. Leda is confused by this approach and consider it a short-sighted and damaging strategy by the Council.</p>				

	<p>1.4. Through the review of the Core Strategy (based on a more realistic housing need), it is likely that further housing sites will be required by the Council. As such, it should be taking this opportunity to provide further directions for growth in sustainable locations, not reduce its options.</p> <p>1.5. It is Leda's view that the settlement boundary review should form part of a combined Core Strategy Partial Review and Housing Site Allocations Plan with housing allocation sites included in the revised boundaries. This will help ensure the delivery of the allocation and offer greater certainty to communities.</p>
Attached files (Please see Objective)	4737954
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3007	Consultee Nick Hardcastle Leda Properties Ltd Person ID: 840643	Agent Mr Steven Sensecall Partner Carter Jonas LLP incorporating Kemp and Kemp Person ID: 646956	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5. Land at Marsh Farm, Royal Wootton Bassett.</p> <p>5.1. Land at Marsh Farm is located on the northern edge of the town at Coped Hall, lying to the west of the A3102 and north of the B4042, extending northwards to the M4 motorway. The land is presently in agricultural use and generally has gentle contours and a level topography. There is varied landscaping around the site's perimeter, with hedges demarcating the existing field pattern and some mature trees.</p> <p>5.2. To the southwest, across the B4042, are residential properties, while to the east, across the A3102, are agricultural fields. To the west is an area that is being developed to accommodate a new sports 'hub' comprising a range of facilities for rugby, cricket, football and tennis. Along the A3102 frontage of the site there are also a number of residential properties and the Marsh Farm Hotel.</p> <p>5.3. The Coped Hall roundabout to the south west corner of the site is a key gateway into Royal Wootton Bassett from Swindon and the M4 and is the focus for a range of commercial activities including a car sales garage, public house, Travis Perkins builder's merchants and a Rapid Hire tool and plant hire centre.</p> <p>5.4. Leda's current proposal for Land at Marsh Farm is a comprehensive mixed use development of up to 320 dwellings, a community hub comprising up to 500 sq. metres of A1/A2/A3/A4/A5/D1/D2 uses, public open space, landscape works, extension to the approved sports 'hub' and access. The wider proposal includes a supermarket and Class C2 care home.</p> <p>5.5. A number of studies have already been carried out on the site including:</p> <ul style="list-style-type: none"> Landscape and Visual Impact Assessment Ecology Survey Air Quality Assessment Flood Risk Assessment Noise Survey Archaeological Evaluation Transport Assessment A Statement of Community Involvement Illustrative Masterplan (a copy of which can be found at Annex 2 of this submission) <p>5.6. No 'show stopper' constraints were identified in the studies. The site is not located within any areas where development should be restricted i.e. it is not designated as a SSSI, Green Belt, green space, schedule ancient monument etc. In short, there are no over-riding obstacles to development, which would outweigh the presumption in favour of this site being built out. The site is readily available for development with no known impediment to ensuring timely delivery.</p> <p>6. Conclusion</p>				

	<p>6.1. The housing targets in the Pre-submission Wiltshire Housing Site Allocation Plan are in-line with Council's adopted Core Strategy 2015. The draft Plan is expected to be adopted in September 2018 (some 3 years after the adoption of the Core Strategy).</p> <p>6.2. The Inspector found the Core Strategy sound on the basis that there would be an early review of the strategy based on an up-to-date SHMA (the Inspector's Report referred to a new SHMA in early 2016). To date this has not happened.</p> <p>6.3. Leda therefore believe that the Council should now be preparing a joint Core Strategy Partial Review and Housing Site Allocations Plan to ensure it has a 6-10 year and a 11-15 year housing supply (as required by the NPPF) based on an up-to-date need.</p> <p>6.4. The Council's settlement new settlement boundary for RBW is too restrictive. The drawing of new settlement boundaries should form part of the joint Core Strategy Partial Review and Housing Site Allocations Plan process and include the new housing allocations. This will ensure their delivery and provide certainty for local communities.</p> <p>6.5. A number of key studies have already been carried out on land at Land at Marsh Farm, Royal Wotton Bassett and no serious impediments to development have been identified. Leda's current proposal for the site is a mixed use residential development which would deliver both market and affordable housing and local facilities including employment, retail and a care home.</p>
Attached files (Please see Objective)	4737954
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3008	Consultee Bovis Homes Bovis Homes	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 998345	Person ID: 556489	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3, 5.125. table 5.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site 70 is shown is confusingly shown in Table 6.2 of the Amesbury Community Area Topic Paper as both removed in Stage 2a and taken forward to the next stage (2b). Table D.5 in Appendix D shows the site scores well in respect of the five exclusionary criteria from Table D.2, with all greens, for a capacity of 57 dwellings, with a recommendation that the site is taken forward to the next stage.</p> <p>In the question in Appendix E Stage 2 Assessment Criteria 'Have local housing needs already been considered by a sufficiently advanced neighbourhood plan?' for Porton, the answer is Yes given for the sole reason that a neighbourhood plan has been made. Unfortunately, the Idmiston Neighbourhood Plan assesses only local housing need in Porton and Idmiston and does not have regard to housing need in the wider Salisbury Housing Market Area or the Council area generally. Wiltshire Council is not meeting the housing needs of its area and a step change in provision is needed, not only in main settlements but also in large villages like Porton.</p> <p>It would seem this is partially recognised by the Council as the Draft Site Allocations is already proposing to allocate sites in large villages. For example:</p> <ul style="list-style-type: none"> -50 dwellings in Hullavington 50 dwellings in Crudwell; and 40 dwellings in Bratton <p>The Neighbourhood Plan allocates small sites around Porton which should not exceed 11 in number. These are unlikely to deliver affordable housing to meet even local needs, yet alone wider Council needs. The Neighbourhood Plan relies on affordable housing to be delivered via exception sites, which is not a very reliable way forward.</p> <p>Whilst part of Site 70 received early support in the selection process for up to 10 dwellings, the whole site is excluded because of the made Neighbourhood Plan.</p> <p>The selection criteria note that the local primary school is full but the school site has capacity for expansion. It is often the case that small schools can benefit from expanding, leading to less year groups needing to be mixed. The development of Site 70 for approximately 50 dwellings would bring valuable education contributions, which could lead to a worthy expansion of the primary school, as well contributions to secondary education in Salisbury. The Neighbourhood Plan's approach of just allocating small market housing sites, with exception sites for affordable, will not have the same significant effect.</p> <p>Whilst Appendix E of the Draft Allocations Plan notes that Porton has a regular bus service to Salisbury, adding to its other sustainability credentials of shops, doctors etc, it concludes the site should be removed because of the made Neighbourhood Plan.</p> <p>The Neighbourhood Plan was made in April 2017. Just because this Plan has been made, this should not be an automatic reason to discount Site 70. It must be remembered that the housing target in the Wiltshire Core Strategy 2015 is at least 42,000 homes to be delivered 2006 – 2026. The Inspector considering the Core Strategy was at pains to stress these words 'at least'.</p>				

	<p>The Local Development Scheme envisages adoption of this Allocations Plan in September 2018, albeit that date could slip. We have already heard that a Submission version of the Draft Plan is only likely to be published in early summer of 2018. An Inspector at a recent appeal decision at Hilltop Way Salisbury (APP/Y3940/W/17/3173509) made the following comment in paragraph 16 of the decision letter: ...the fact that the Council cannot demonstrate a 5 year housing land supply, when allowing for 5% buffer would render the adopted plan out of date for the purposes of housing land supply, as paragraph 49 of the Framework states</p> <p>Extracts from Paragraph 14 of the Framework state: For plan-making this means that: Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - Specific policies in the Framework indicate development should be restricted.</p> <p>For decision-taking this means: Where the development plan is absent, silent or relevant policies are out of date, granting permission unless: - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or - Specific policies in the Framework indicate development should be restricted.</p> <p>Housing policies for the Southern HMA in the Core Strategy are therefore at risk of being considered out of date in the decision making process, if planning applications are submitted. Those preparing plans also need to take this into account and provide sufficient housing allocations in the Plan.</p> <p>Bearing in mind that the only reason that this site was not taken forward in this Allocations Plan was because of the Neighbourhood Plan, with all other matters being satisfactory, Wiltshire should reassess this matter, taking into account the dynamic nature of the planning background in terms of increased housing need and lack of adequate housing land supply. The planning situation has changed since the Neighbourhood Plan was made with the South Wiltshire not have a five year housing land supply.</p> <p>Bovis Homes has an arrangement in place with the landowner, has a preliminary layout for 50 dwellings drawn up, with 30% affordable housing (See attached) and are prepared to make financial contributions to education and community facilities. This site could be delivered rapidly. This is against the backdrop of the Council being on the knife edge currently with regard to its housing land supply in the Southern HMA and the severe need for the provision of more affordable housing throughout Wiltshire.</p> <p>Taking into account the Framework, in respect of Porton, it is respectfully requested that because of these issues, the Council reassesses this site and allocate it for development of around 50 dwellings, which would make a valuable contribution to the Council's 5 year housing land supply and the provision of affordable housing.</p>
Attached files (Please see Objective)	4738371 / 4738844
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to elaborate on these submissions particularly to demonstrate the merits of the site, the proposed development and the housing need and housing land supply situation at the time of the examination.

Comment ID:	3009	Consultee Sarah Harris Admin Assistant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Westbury Town Council	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.58			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Westbury Town Council – Wednesday 27th September 2017				
	In principle we support the inclusion of continuous existing housing development, other than, where detailed below as exceptions:				
	Map Grid Ref	Responses from Westbury Town Council			
	H13/I13/I14	Leighton House Estate We object to the inclusion of Leighton House. With our reasons that we are satisfied with the allocation of associated housing already.			
	I13	Leighton Sports Centre			
E12/E13	Pinto Walk We support this inclusion. We understand planning permission has been submitted on part of this land for a potential day nursery site; we would expect this to be included within the boundary.				

D13/D14	Black Horse Lane
E13/E14	We support this inclusion.
E15/F15	Courtleigh We object to the inclusion of Courtleigh. With our reasons that this property has stood outside the boundary for the last 100 years and is an isolated dwelling.
E11	Fell Road / Hackney Way We support this inclusion.
F10/F11	Redland Lane We support this inclusion.
E9/E10	Oldfield Road
F9	We support the adjustment here.
F7/F8	Station Road – Sailing Lake
G7/G8	Strategic site has not been included in the proposed boundary.
F6/F7	Station Road / The Ham There are previous permissions here and the area is the subject of planning applications on the land which include permission for residential dwellings.
A4/A5	Industrial Estate
B3/B4/B5/B6/B7	We support the inclusion of this area.
C3/C4/C5/C6/C7/C8/C9	
D3/D4/D5/D6/D7/D8/D9	

E3/E4/E5/E7/E8	
F3/F4	
J7/K7	Bitham Park – Land North of We note this has not been included and this land already has planning permission.
K8	No specific comment.
L8	Support.
K11/L11	We support the protected open space.
J6/J7/I7	The Mead development.
D14	Support.
D15/D16	No specific comment.
H14	No specific comment.

Westbury Town Council
Housing

Westbury Town Council is pleased to see that it has been acknowledged that Westbury has had excessive housing development in recent years and has met previous housing allocations with little infrastructure support and no further large scale development is planned for Westbury. This is a voted opinion of Westbury Town Council (meeting date 18.9.17) in response to the consultation entitled (Draft Wiltshire Housing Site Allocations Plan) which the majority of town councillors have confirmed that they thought was a consultation about housing allocations as per the title.

The following are narrative, collated from the meeting but not voted opinions of Westbury Town Council and should be treated as draft.

Explanation of situation relating to the settlement boundary review

Staff and most councillors had failed to realise that the consultation (Draft Wiltshire Housing Site Allocations Plan) was actually a consultation on Housing Site Allocations and Settlement Boundaries unexpectedly merging two previous separate consultations into one.

When the agenda was sent out for our HP&D meeting of 18.9.17, the item was described to councillors as housing site allocations policy which as previously discussed had no housing allocations for Westbury. Some councillors queried the references to the boundary review and staff contacted Spatial Planning (Helena Carney) for clarification and were still confused to receive a link to a site entitled Draft Wiltshire Housing Site Allocations Plan, which was a consultation we already knew about. As late as at the meeting on 18.9.17 staff still believed that the opportunity to respond to the settlement boundary review was missing from the consultation site.

It did not help that the site was not functioning during our meeting when we tried to check the details for a response date.

	<p>At the end of the meeting we were still uncertain as to how to submit our comments on the settlement boundary review and what the closing date was and by the time we were able to confirm this the three day rule prevented the committee from reconvening. We would respectfully request that we would be allowed to clarify our views at an Extraordinary Committee meeting on Weds 27th Sept 2017.</p> <p>At this stage we would still question the decision to take what was two separate consultations, merge them into a single one, and give it the same title as one or the original consultations. This was particularly unfortunate in the case of Westbury as the named aspect of the consultation (Housing Site Allocations) has no elements effecting Westbury.</p> <p>Many councillors complained that becoming aware that the documentation was also about a settlement boundary review and not just housing allocations, with just 3 working days notice until the meeting where we were expected to agree our comments.</p> <p>At the meeting the following items on the settlement boundary were discussed.</p> <ul style="list-style-type: none"> • Status of Leighton House • Status of built land at Leighton Sports Centre • Implications of inclusion of Industrial Areas? • Brownfield Sites within the town • The inclusion of the former hospital site • The absence of the permitted site, land north of The Mead • Is the doctors surgery any way protected for that purpose? • Small boxes in the area of The Grove which we take to be allotments but would like to confirm this with the current process for allotments • Would we expect an approved strategic site to appear within the boundary ie the land at Station Road? • How does the future housing land fit with other land usage types (commercial/leisure)? • What pressure would proposed future development put on existing infrastructure? • Where are the pinch points with regards protected land, flood zones, wildlife preservation, long term sustainable development/town planning, neighbourhood plan, etc? • I would like to be able to see the proposed settlement area in relation to other relevant layers, is this available on mapping software anywhere? • whether the boundaries are subject to review when we draw up our neighbourhood plan.
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3010	Consultee Mr Andrew Murrison Member of Parliament	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 392552	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Whole document			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in response to the consultation on housing allocation.</p> <p>Firstly I accept the need for new homes, particularly low cost homes, to serve an evolving demographic. However, it has long been my view that an undue burden has been placed on the west of the county through the artifice of combining north and west Wiltshire for planning purposes in the core strategy. You can see how artificial this is by looking at the disparity in numbers at table 1 in the plan. It has succeeded in shifting allocation south and west, particularly to Trowbridge and Westbury, and away from the logical Wiltshire growth site around junction 17 of the M4 which would have better allowed the 'sustainable distribution of growth' referred to in the draft plan. The continuation of this process has forced into scope the 'less sustainable' sites referred to in the plan that abut Trowbridge. The subordination of the sustainability criterion calls into question the value of the already strained decision algorithm reproduced in the plan.</p> <p>I strongly object to the use of what the plan admits are 'less sustainable' sites, particularly where it would have the effect of filling in green space between a principal settlement and the villages in its immediate neighbourhood.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3011	Consultee Mrs P E Clarkson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138653	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is entirely inappropriate to swamp the villages of North Bradley and Southwick when there appear to be derelict sites within Trowbridge itself which could be developed? I'm referring principally to the Bowyers sites, nicely placed in the centre of Town, convenient to hops, trains, buses, cinema etc etc and also served by Hospital, doctors, dentist etc. We in North Bradley do not have those services but we do have access to a bus service which takes us into the Town when we want.</p> <p>The other site is the West Wilts site on Bradley Road, Wiltshire Drive which has been empty for a very long time! Time to build there? I know eventually you can "compulsory purchase" our green fields so why not purchase these derelict sites in Trowbridge.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3012	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Longford Estate Person ID: 900160	Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.68		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 4.68 relates to the likely lead-in time for the delivery of Site S0128 (Land at Netherhampton Road). It states the following: "Recognising the scale of the site, a generous lead in time is provided for the delivery of Netherhampton Road. The site is not expected to contribute to housing delivery for several years whilst work is carried out to masterplan the site and develop mitigation measures." As outlined in the representations made to Policy H.3.1, there are a large number of concerns relating to the deliverability of the Land at Netherhampton Road. These include major highways concerns; landscape impact; archaeological concerns and viability (relating to the lack of water supply to the site). Paragraph 4.68 implies that masterplanning and mitigation measures will take only "several years". The mitigation of the City's current highways concerns have been on Wiltshire Council's agenda for 5-10 years (since the traffic modelling for this Plan Period was undertaken in 2008), yet no action has been taken.</p> <p>In terms of lead times a report into the delivery of urban extensions on behalf of Gladman developments limited was prepared in February 2014 and was submitted as evidence to the Stroud Examination. The Gladman study was supported by evidence provided by local authorities on 78 sites. The Study considered the factors associated with bringing forward major urban extensions of 500+ dwellings before moving on to look at specific case studies from each of the English regions, Scotland and Wales. The Study was an exercise in considering deliverability, the factors which affect deliverability, the timescales involved from a site being identified for development to planning permission being granted and thereafter the rates at which housing can realistically be delivered on major urban extension sites of 500+ dwellings.</p> <p>The results of the site specific research, was then drawn together to inform an overall assessment of the timescales associated with bringing forward urban extensions and rates of delivery once development gets underway. The Study was made available to LPAs, government departments and agencies and industry bodies as an evidence based tool which can be drawn upon to inform Development Plans across the UK.</p> <p>The Study found that the time taken to determine planning applications is a major factor in the overall delivery timescales for Major Residential Development sites. The average time period from the initial concept to the grant of planning permission for sites in England is 6.67 years. The average timescale from submission to a grant of outline planning permission was 34 months (time periods for determination as provided by the relevant Authority).</p> <p>The average across those sites in the Study which have extant permission in outline and where the timescales between the Council resolving to grant permission and the decision being issued are available (where the time period for legal agreements to be made has been provided by the Authority) was 23.6 months. It should be noted many sites failed to progress beyond a resolution to grant because of unresolved legal matters. In terms of delivery from subsequent discussions with the relevant developers the Study found (including Taylor Wimpey, Barratt, David Wilson Homes, Bellway and Redrow), the average annual delivery rate of 30 - 35 dwellings per annum per single house builder outlet is realistically achievable.</p> <p>The Study concluded that an 8-year period should be allowed for from the preparation of an outline/ principle planning application to the delivery of homes. It is important to note that the Study was rooted in factual evidence provided by Local Authorities across England and Scotland.</p>				

	<p>The Savills Study on behalf of Barratt Homes in October 2014 provided an update on the Gladman Study (also submitted to the Stroud Local Plan Examination). It identified 24 sites for which an outline application was submitted after 2010, 18 of which were identified in the original Gladman report.</p> <p>Compared with the overall sample, these sites progressed much more quickly, taking an average of 33 months from the submission of the outline application to start on site, against the average of the whole sample of 60 months. "This suggests that it has become more likely that large sites will progress through the planning system quickly enough to begin delivering housing units within the lifetime of a five-year housing land supply plan." Even so, 33 months from submission of outline planning application to a start on site would still point to an overall period approaching 4 years for the first occupation once the initial infrastructure phase has been allowed for together with the construction period for the first houses.</p> <p>If this were applied to the Netherhampton site, it would take 6.7 years to progress to outline application stage, and a further 33 months so first commencement. This would take the timeframe to 2026 at the very earliest. It cannot be assumed by Wiltshire Council that it will only take several years before it starts to contribute to the housing supply.</p> <p>Therefore, even in the event where Site S1028 is considered to be developable, it is highly unlikely to commence within the plan period. It is submitted that the inclusion of Site S1028 is not "effective" as it is not deliverable within the plan period.</p> <p>Longford Estate owns Site 3435 (Land off Britford Lane) which has been subject to technical studies which confirm that the site is deliverable and achievable within the plan period. A planning application is ready for submission immediately following the adoption of the WHSAP.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Longford Estate welcome the opportunity to discuss with the Inspector the research relating to the lead-in times relating to strategic housing allocations and the implications to the WHSAP.</p>

Comment ID:	3013	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Longford Estate Person ID: 900160	Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.128		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 5.128 of the WHSAP relates to the transport network in Salisbury, one of two Principal Settlements in Wiltshire. The paragraph seeks to provide reassurance relating to 'measures to support the scale of growth envisaged by the WCS'. Longford Estate has several key concerns in this regard.</p> <p>The Summary of the Salisbury Transport Strategy (2012) is attached at Appendix 3. There are no page numbers unfortunately, but page 1 sets out the housing growth for Salisbury and Wilton as set out in the WCS as 4, 170 homes. However, the indicative requirement is in fact 6,060 homes by 2026.</p> <p>Figure 3.2 of the Summary document specifically identifies the Harnham Gyratory, Exeter Street roundabout and the Park Wall Junction as operating at over 70% - 90% capacity. These junctions would all be heavily affected by the proposed allocation of 640 homes on Netherhampton Road as the traffic from that site (Site S0128) will pass at least one of these junctions when travelling to any destination.</p> <p>Section 3 of the Summary document sets out the highway constraints as including: The highway network is constrained by the operation of Exeter Street Roundabout. There are delays on the roads approaching the Harnham Gyratory. Some through traffic between Wilton and Southampton Road routes through Harnham rather than the A36. Despite forecasting traffic modelling dating back to 2008, there has been no progress in terms of upgrading the existing highway network to date. The Summary document makes the following recommendations for network improvements to the Harnham Gyratory and Exeter Street roundabouts but there has been no progress in terms of upgrading the capacity. Furthermore as the housing requirement increases, there is no evidence to demonstrate that the proposed measures to 'upgrade' the road network will be sufficient to address the increased amount of traffic. Paragraph 5.6 of the Summary document states that: "Junction improvements tend to result in more traffic passing through a particular junction and thus consume any of the additionally created capacity. This is particularly so in Salisbury, where the Netherhampton Road provides an alternative route for traffic passing through Salisbury and improvement to traffic flow through the Harnham Gyratory would result in more traffic travelling along Netherhampton Road rather than along the A36." This implies that Netherhampton Road could (in 2012) accommodate increased levels of traffic from the Harnham Gyratory travelling away from Salisbury City Centre. The proposal of 740 homes on Netherhampton Road will not only have a major adverse impact on these junctions, it would also have content with the additional traffic proposed above if the Council's plans come to fruition. It is proposed that the Council's Transport Strategy is flawed and before any strategic allocations can be made, the traffic modelling and proposed network improvements MUST be robust and based on housing trajectories looking forward to 2036 in line with the timescales of the Council's intended Local Plan Review. The Council cannot rely on the status quo to support the levels of traffic movements that would be generated from 740 homes on Netherhampton Road.</p>				

Attached files (Please see Objective)	4738358
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Given the concern over outdated traffic modelling and lack of highway network improvements.

Comment ID:	3014	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Longford Estate	Pegasus Planning	Do you consider the draft WHSAP is sound?	No
Person ID: 900160			Person ID: 900154		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocations Plan Pre-Submission (Regulation 19) draft plan (WHSAP) was published for public consultation on Friday 14th July 2017, the consultation runs until Friday 22nd September 2017.</p> <p>These representations are submitted on behalf of Longford Estate and relate to the allocation of sites and the resultant housing land supply in the Southern Wiltshire Housing Market Area of Wiltshire.</p> <p>The WHSAP is a daughter development plan document to the adopted Wiltshire Core Strategy (2015) (WCS). The WCS set out minimum housing requirements for each of the three Housing Market Areas in the County.</p> <p>Table 2.1 of the WHSAP reiterates the Core Strategy requirement and states that the minimum housing requirement for the Southern Wiltshire Housing Market Area is 10,420 dwellings for the plan period 2006- 2026.</p> <p>The spatial strategy seeks to locate development using the hierarchical approach set out at Table 2.2 of the WHSAP. The spatial strategy identifies settlements according to the following hierarchy Principal Settlements; Market Towns; Local Service Centres; Large Villages and Small Villages.</p> <p>The WCS adopted indicative Community Area requirements for housing delivery for the period 2006 -2026. The WHSAP seeks to ensure that sufficient allocations are made to meet the minimum requirements of the WCS, in accordance with the spatial strategy adopted by the WCS in 2015.</p> <p>Table 2.3 of the WHSAP reiterates the Indicative Requirements for each community area set in the WCS. For the Southern Wiltshire Community Area the indicative requirement for the Plan Period totals 615 dwellings, with 190 to be delivered at the settlement of Downton and 425 dwellings across the remainder of the Southern Wiltshire Community Area.</p> <p>The strategy for the allocation of sites to meet Community Area Requirements is described in detail in each Community Area Paper, in my clients instance the Southern Wiltshire Community Area Topic Paper (June 2017) applies (SWCTP).</p> <p>The WHSAP also includes a review of settlement boundaries as this was not undertaken as part of the WCS plan making process. The WHSAP clearly states at paragraph 1.3 that local communities are able to review their own settlement boundaries through the preparation of neighbourhood plans.</p> <p>The WHSAP has three objectives;</p> <p>Objective 1: To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Services Centres and Large Villages.</p> <p>Objective 2: To help demonstrate a rolling five-year supply of deliverable land for housing development - a duty on each Local Planning Authority required by the NPPF.</p> <p>Objective 3: To allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy. The spatial strategy for Wiltshire contained in the Core Strategy promotes the sustainable development of the County.</p>				

Table 4.1 of the WHSAP states that of the minimum 10,420 dwellings to be provided in the South Wiltshire Housing Market Area 2006-2026, 5,067 have been completed between 2006-2017 and 4,759 are allegedly committed to be delivered between 2017-2026 leaving a minimum to be allocated of 594 dwellings. We refer to our representations relating to Table 4.1 which concludes that the developable commitments are incorrect and the therefore the minimum to be allocated should be 1,544 rather than 594.

Paragraph 4.2 of the WHSAP states that these figures are a minimum to be allocated but, 'that a surplus is necessary in order to maintain a five year housing land supply in each housing market area and to surpass the buffer in excess of five years required by the NPPF.'

Policy H3 of the WHSAP states the sites to be allocated to meet the 594 dwelling need in South Wiltshire HMA at Salisbury and Amesbury as follows;

Community Area	Reference	Site name	No of Dwellings
Salisbury	H3.1	Netherhampton Road, Salisbury	640
	H3.2	Hilltop Way	10
	H3.3	North of Netherhampton Road	100
	H3.4	Land at Rowbarrow	100
Amesbury	H3.5	Clover Lane, Durrington	45
	H3.6	Larkhill Road, Durrington	15

It is submitted however that the approach taken in the South Wiltshire HMA is an inconsistent approach as the plan proposes to make allocations at Large Villages in the North and West Wiltshire Housing Market Area within the Chippenham; Malmesbury, Warminster and Westbury Community Area remainders in order to meet housing land supply requirements.

The adopted WCS set up requirements for each community area to have a housing target. The evidence that sites behind the WHSAP demonstrates that the Southern Wiltshire Community Remainder Area still has a requirement to be met (notwithstanding the wider supply across the HMA).

The Southern Wiltshire Community Area Topic Paper for (June 2017) (SWCTP) states at Table 2.1 that the settlement strategy for the Community Area is as follows; Downton is a Local Service Centre; Alderbury, Coombe Bissett, Morgan's Vale/Woodfalls, Pitton, Whiteparish and Winterslows/Middle Winterslow are Large Villages 12 other villages are Small Villages.

Table 2.2 of the SWCTP identifies an indicative residual requirement of 0 dwellings for Southern Wiltshire Community Area for the plan period 2006-2026. This relies on 183 Developable Commitments coming forward within the plan period. There is no evidence provided which sets out the developable commitments, nor their status.

It is submitted that Policy 1 of the WHSAP is not sound as;

It fails to plan positively in accordance with the paragraph 17 of the NPPF to identify sites to meet the South Wiltshire Remainder Housing need identified in the WCS and instead relies on existing committed supply within the HMA, but outside the Southern Wiltshire Community Area remainder, to meet that locally specific minimum need.

Paragraph 17 of the NPPF states that,

'Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth'.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Southern Wiltshire Community Area remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence.

Comment ID:	3015	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Longford Estate	Pegasus Planning	Do you consider the draft WHSAP is sound?	No
Person ID: 900160			Person ID: 900154		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Table 4.2 of the WHSAP states that in the South Wiltshire HMA allocations are to be made at the Principal Settlement of Salisbury and the Market Town Settlements of Amesbury, Bulford and Durrington. Paragraph 4.5 of the WHSAP states that no allocations are made at Large Villages in the South Wiltshire HMA because, 'No suitable sites were available at Large Villages in the South Wiltshire HMA and therefore the Plan makes no allocations in that area either.'</p> <p>Longford Estate disagrees with this statement. The Estate has promoted Site S110 (Land to the East of Southampton Road, Alderbury) for over 15 years. It was considered to be a suitable housing site and recommended to be allocated for housing by the Planning Inspector who reviewed the Salisbury District Local Plan (adopted in 2003). It has continued to be promoted since then and an outline planning application for 50 dwellings is currently under consideration by Wiltshire Council (planning application ref. 17/04001/OUT). A copy of the location plan is included at Appendix 4.</p> <p>The proposals will deliver a range of social, economic and environmental benefits which can be afforded varying levels of weight as identified below. These include;</p> <ul style="list-style-type: none"> Facilitating a community 'hub' for Alderbury Land to Alderbury Football Club (AFC) enabling its relocation and expansion plans to develop; A relocated Guide Hut which would benefit from the AFC car parking; A new Pre-School building to enable the charity to meet the increasing demands for places and ensure longevity, and Safeguarded land for the adjacent Primary School to benefit from additional play space. <p>The site is outside of any designations and surrounded by built form therefore the degree of change to Alderbury village is at worst marginal. Of all the Large Villages identified in the SWCTP, Alderbury is the largest with a greater number of residents and facilities, and it is the most sustainable, being the closest to Salisbury city centre (2km) with a number of regular bus routes into the City Centre and within 1km of the Park and Ride. Alderbury has a primary school; including before and after school care (with confirmed capacity to accommodate children from the proposed 50 dwellings); a pre-school and other village infrastructure such as local pubs, shops, churches and community facilities that are well placed to accommodate growth in order to meet local housing needs and support existing services and facilities including rural employment opportunities.</p> <p>It is submitted that Policy 1 of the WHSAP is not sound as;</p> <p>The WHSAP also fails to allocate sites in accordance with spatial strategy of the WCS, as in this instance, after the Local Service Centre of Downton, (which has a large strategic allocation adopted plus a recently adopted Neighbourhood Plan), the next tier of settlement to accommodate housing growth to meet housing need are the Large Villages described above.</p> <p>The WHSAP is inconsistent as it allocates sites in Large Villages in the North and West Housing Market Area but does not adopt the same approach for the South Wiltshire HMA.</p> <p>The WHSAP relies on the delivery of housing to meet local need at Large Villages through Neighbourhood Plans, however of the Large Villages in the Southern Wiltshire Community Area only one has a Neighbourhood area identified. Given the WHSAP is in the process of being prepared</p>				

	<p>now it is incumbent upon the Council to identify sites for development in the Southern Wiltshire Community Area in Large Villages in order to provide certainty over housing delivery for the plan period in the absence of substantive neighbourhood plan preparation across the large villages in the Community Area, with Alderbury being the logical choice being the largest and most sustainable of all the large villages.</p> <p>Site S110 is located in a sustainable location as described above and has a thriving local community with active community organisations and associations. The allocation of Site S110 in this location would help to sustain the local services and facilities and would meet local housing need. However, as the Sustainability Appraisal has not assessed any sites in the Southern Wiltshire Community Area it is not possible to assess their relative merits against the sustainability merits of those sites that have been allocated by Policy H3.</p> <p>The suggested change to Policy H3 is to include S110 (Land to the east of Southampton Road, Alderbury) at Large Villages in the Southern Wiltshire Community Area as a housing allocation.</p>
Attached files (Please see Objective)	4738357
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Southern Wiltshire Community Area remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence.

Comment ID:	3016	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Longford Estate Person ID: 900160	Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Potential development sites in the Southern Wiltshire Community Area, including site (Site S110 - Land to the east of Southampton Road, Alderbury) submitted to the Wiltshire Strategic Housing Land Availability Assessment process, have not been assessed in the Sustainability Appraisal (June 2017) as the WHSAP states that development in the Large Villages in the Southern Wiltshire HMA should come forward through Neighbourhood Plans, not through allocations in the WHSAP.</p> <p>The Housing White Paper published in February 2017, 'Fixing our Broken Housing Market' (HWP), states at paragraph 1.29 that; 'Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive'.</p> <p>Paragraph 1.33 of the HWP states that the National Planning Policy Framework (NPPF) will be changed to; 'Expect local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up'.</p> <p>It is clear from the HWP (Feb 2017) that the current policy approach of the Government to housing in villages is to support development that will help villages to thrive and to meet local housing need. While changes to the NPPF are yet to be published for consultation the Government's emerging direction of travel with regard to this policy matter is clear, and accordingly sites for growth in the Large Villages of the WHSAP should be positively considered for allocation within the Southern Wiltshire Housing Market Area where Neighbourhood Plans are not at an advance stage of preparation.</p> <p>For certainty and to plan positively for housing land supply purposes, and to meet the minimum local housing need identified through the WCS the WHSAP should allocate sites in the Large Villages.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Southern Wiltshire Community Area remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence.				

Comment ID:	3017	Consultee Mr Bill Evans Person ID: 1136300	Agent Mr Mark Owen Senior Planner Barton Willmore LLP Person ID: 1136298	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.9				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>We write on behalf of our client (Mr. Bill Evans) to provide a response to the Pre-Submission Draft Wiltshire Housing Site Allocations Plan (hereafter called 'Draft Wiltshire SAP') which is currently out for public consultation until Friday, 22nd September, 2017.</p> <p>We note that the purpose of the Draft Wiltshire SAP is twofold - to revise, where necessary, settlement boundaries; and to allocate new sites for housing to ensure the delivery of homes across the plan period. In regards to the former, the document includes a settlement boundary review of the village of Baydon which is found within the Marlborough Community Area.</p> <p>We note that on page 16 of the Draft Wiltshire SAP it sets out the following objective to review settlement boundaries: "To ensure there is a clear definition to the extent of the built up areas at Principle Settlements, Market Towns, Local Service Centres and Large Villages."</p> <p>We also note Table 8.1 of the 'Topic Paper 1- Settlement Boundary Review Methodology' (June 2017) which provides a list of areas that have been included and excluded from the settlement boundaries. The list of areas that have been included within the settlement boundaries include: "built and commenced residential and community facilities development such as religious buildings schools and community halls, that is physically related to the settlement." (our emphasis)</p> <p>Noting the Objective within the Draft Wiltshire SAP and what is indicated at Table 8.1 within the Topic Paper, we consider that the house (and its curtilage) at Becketts does not represent the perceived 'natural' southern edge of the village of Baydon.</p> <p>On behalf of our client, Barton Willmore have prepared a Landscape Statement (September 2017) (Appendix 1). As the series of Site Context Photographs 1-7 within this Landscape Statement demonstrate, the perception of the edge of the village when approaching from the Aldbourne direction to the south west of the village, clearly lies to the south of Turf Run. Views of street and road signage, glimpses of built form, telegraph poles, boundary treatments (such as clipped and brightly coloured conifer hedging, brick walls with gates and lighting, wooden panel and close boarded fencing etc), and the repeated use of evergreen conifers within the gardens of the various properties in this part of Baydon, combine to give a strong impression that one has entered the village as one turns the corner of Aldbourne Road adjacent to the entrance to Baydon House Farm. Furthermore, Site Context Photograph 3 shows the 'Welcome to Baydon' gateway feature which is located prior to the corner of Aldbourne Road and clearly gives the impression of arrival to the village.</p> <p>This combination of non-natural features clearly indicates the presence of a series of properties which stands in strong contrast to the rural features further to the south along Aldbourne Road, and are therefore physically related to the settlement of Baydon.</p> <p>On this basis, it is considered that the more logical location for the Baydon Settlement Boundary would be the southern boundary of Turf Run (see image below identified by the dashed redline). This would represent a logical and robust Settlement Boundary which is well-defined by physical features and responds positively to the existing landscape character. This in turn would therefore accord with the Objective within the Draft Wiltshire SAP, as a clear defined extent of the built-up area of Baydon.</p> <p>Figure1:Revised Proposed Settlement Boundary (see attachment)</p>			

	<p>Furthermore, we have found examples within the Draft Wiltshire SAP of extensions to the proposed settlement boundaries to include residential properties on the edge of settlements. This is evident at other settlements within the Marlborough Community Area as identified below: Dwellings to the west of Marlborough (Grid references B6, B7 and C6 on page 87) Dwellings to the north of Aldbourne (Grid references J3, J2 and J3 on page 88) Dwellings north west of Baydon (Grid reference HS)</p> <p>On the basis of the above, we question the robustness of the settlement boundary review which has been undertaken by Wiltshire Council. As indicated by the above, there are clear examples where the settlement boundary is proposed to be extended to include residential properties which form a natural edge to those settlements. We therefore consider that the Draft Wiltshire SAP is unsound as the settlement boundary review it is not based on a justified approach.</p> <p>Summary</p> <p>On behalf of our client, we consider that there are no clear reasons as to why the proposed settlement boundary to the south of Baydon should not be extended to the 'natural' edge of the village (i.e. the southern boundary of Turf Run). As indicated above, there are examples within the Draft Wiltshire SAP where settlement boundaries are proposed to be extended to include residential properties which form a natural edge of that settlement, and therefore we consider that this situation is no different.</p> <p>If the Council consider that the settlement boundary to the south of Baydon should remain as it is, then we question the robustness of the settlement boundary review and consider that the approach taken is not justified and therefore the Draft Wiltshire SAP is unsound.</p> <p>We trust this response is clear and helpful but should there be any queries in relation to the above and attached, please do not hesitate to contact the writer.</p>
Attached files (Please see Objective)	4738849
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We consider that the settlement boundary review which forms part of the Pre-Submission Draft Housing Site Allocations Plan is inconsistent (as explained in the attached letter) and therefore the methodology is not justified. On behalf of our client we would like to have the opportunity to raise this matter at the oral part of the examination.

Comment ID:	3018	Consultee Mr Charles Routh Planning and Local Government Natural England Person ID: 382216	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Habitats Regulation Assessment - Bath and Bradford on Avon Bats SAC - Habitat Loss / Deterioration				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Habitats Regulation Assessment - Bath and Bradford on Avon Bats SAC - Habitat Loss / Deterioration</p> <p>Bat usage of sites. The sites under consideration have not, in general, been subject to site specific bat surveys. Instead, their value for SAC related bats has been based on ad-hoc bat records, habitat information, and professional judgement around how bats are thought to use the area. As such, significant uncertainty remains around the significance of these sites for bats. As such it is possible that, at application stage, site specific survey will show specific sites to be much more important, and potentially undeliverable. This should be recognised in the Plan.</p> <p>Onsite mitigation. A range of onsite mitigation measures are proposed. However, it is not clear that these measures can be delivered while delivering the development requirements of the site. For example, can hedgerows be retained or will they need to be bisected by access roads etc.? If they cannot be delivered, it is not clear whether this invalidates the conclusions of the HRA.</p> <p>The onsite mitigation policy says “Sensitive habitat features...include: ... These features should be retained...”. The policy thus only protects the listed sensitive features, but not any unlisted sensitive features. The HRA does not discuss whether this list of features covers the vast majority of features or otherwise quantified the proportion of features covered. It would give greater certainty to the HRA if it did.</p> <p>We note that the onsite mitigation policy requires 10-16m of native landscaping. It is not clear why these figures were chosen, and why there is such a spread in width. We suggest this is reviewed and justified, to provide greater certainty in the conclusions of the HRA.</p> <p>Site specific onsite mitigation – Church lane. We note that the site boundary is some distance from the river edge (in contrast to Upper Studley). Inclusion of this land within the red line boundary would allow this area to be used as onsite mitigation. Given the known sensitivities of this area, we strongly advise the redline boundary is extended to the river, and the area used to mitigate bat impacts.</p> <p>Residual effects. We welcome the recognition that the tests of the Habitats Regulations are unlikely to be met in the absence of measures to address residual habitat loss/degradation. Indeed, we imagine that subject to clarification of the two points relating to onsite mitigation, a strategic mitigation strategy would be capable of addressing the residual effects. However, as recognised in the HRA such a strategy will need to be approved before adopting this plan. The current title of the Mitigation Strategy is the Trowbridge Recreation Management Mitigation Strategy, implying it is solely concerned with recreation and not habitat related matters. We advise the title of the strategy is amended to address this.</p> <p>At this stage, however, it is worth noting that, in order to be confident that development in this area will not have an adverse effect on the SAC population, the contribution to such a strategy may be significant due to a number of factors:</p> <p>The significance of the area for this bat species.</p> <p>The high levels of uncertainty around how bats use the area currently, and how this may change due to natural factors over time.</p> <p>Uncertainty around how people will use the area, and how this may affect bat habitat (e.g. potentially higher H&S requirements to fell dead trees etc. as an impact vector).</p> <p>Uncertainty around the ecology of this species (e.g. how faithful they may be to routes which may become suboptimal (i.e. sufficiently dark to continue to be used by bats, but sufficiently light to allow them to be predated).</p>				

	Changing levels of resilience due to climate change and other anthropogenic influences (e.g. ash dieback). Historic issues around developer's compliance with permissions and conditions, and the ability of the Council to monitor and enforce these.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3019	Consultee Mr Charles Routh Planning and Local Government	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Natural England Person ID: 382216		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Habitats Regulation Assessment - Bath and Bradford on Avon Bats SAC – Recreational Pressure			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Habitats Regulation Assessment - Bath and Bradford on Avon Bats SAC – Recreational Pressure Natural England welcomes the work that has been done on this to date. There is one issue we want to draw your attention to. Any mitigation strategy must show that the measures it funds are additional to what would have happened without it. It may be difficult to demonstrate that some access measures (e.g. the costed works at Southwick on P 87) would never happen			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3020	Consultee Mr Charles Routh Planning and Local Government	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Natural England Person ID: 382216		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Habitats Regulation Assessment - River Avon SAC - Phosphate			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Context The Environment Agency's Review of Consents (RoC) Project for the River Avon SAC, which concluded in 2010, gave rise to a number of new permits for Wessex Water STW discharges. The EA concluded that these permits were compliant with the requirements of the Habitats Regulations, even though concentrations of phosphorus (P) throughout much of the SAC would remain unacceptably elevated in comparison to the Conservative Objectives of the site. This conclusion was based on their commitment to work with NE and other partners to develop additional actions to reduce other sources of P, particularly diffuse agricultural pollution. The Nutrient Management Plan (NMP), jointly produced by EA, NE and Wiltshire Council in 2015, provided the evidence base and framework to support these additional requirements, and in the context of these, also considered the need to manage future housing growth to ensure that it did not compromise the achievement of the Conservation Objectives for the SAC. As part of this process Wiltshire Council has led on the production of Annex 2 to the NMP, which deals specifically with the management of increases in P to the SAC arising from housing growth.</p> <p>To ensure that the NMP is robust and fully reflects available knowledge, EA and NE have recently initiated a focused review of the plan, which should be concluded by early 2019, to take account of some specific technical issues that have come to light. This process will also be closely linked with work to deliver EA and NE's Consent Order (CO) obligations following the recent Judicial Review on diffuse water pollution. Natural England has already advised Wiltshire Council that Annex 2 of the NMP will need to accommodate the potential changes arising from the NMP review. Natural England is also aware of more recent modelling undertaken by Wiltshire Council, which has examined the effects of higher housing allocation compared to the NMP values, enhanced water efficiency in new builds and the consequences of any increase in P concentrations in the effluents of relevant STWs, which is possible given current permits.</p> <p>Advice The HRA has drawn attention to the fact that the NMP calculations need to be revised to take account of a number of issues. The available evidence indicates that proposed housing growth could unacceptably increase the concentration of phosphate within the River Avon SAC, even where growth can be accommodated within the existing Wessex Water permits. Linked to this we endorse the advice provided by the Environment Agency re the Habitats Regulation Assessment of the Plan, and conclude that at present the plan is not HRA compliant. We will continue to work with EA and WC to resolve these issues.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3021	Consultee Mr Charles Routh Planning and Local Government	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Natural England Person ID: 382216		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Strategic Environmental Assessment			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is not clear how public rights of way and valued open space has been considered in the Sustainability Appraisal. While they feature under objective 7, (will the policy protect rights of way, open space and common land?), a word search shows that right/rights of way is only mentioned 3 times in the site assessments, while existing open space is mentioned only twice.</p> <p>We note that sites 263 – Elizabeth Way and 293 – Land to the east of Elizabeth Way are described very differently in terms of their effect on objective 7 (landscapes). Of 293, it says Development of this site would represent a significant encroachment into what’s known as the ‘Hilperton Gap’ (i.e. land beyond the line of Elizabeth Way). It is not clear where this definition of ‘Hilperton Gap’ comes from. The Regulation 14 Pre-Submission Consultation Draft Hilperton Neighbourhood Development Plan provides a plan consistent with what would appear to be the intuitive extent of the “gap”, namely all the open land between Hilperton and Trowbridge, not just the land beyond the line of Elizabeth Way.</p> <p>Nor is it clear why they score differently under objectives 8 and 11. This reflects a more general point that for some objectives the assessment appears to be assessing impact of the site rather than impact per dwelling. E.g. “However the size of the development will result in an increase in private vehicle trips (SA Obj. 10).” It would seem inappropriate if (say) two adjoining small sites were to score differently than if they were considered as one single site. We suggest for all objectives, the consideration should be an assessment of impact per dwelling.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3022	Consultee Mr Alasdair Jones-Perrott Estate Manager Longford Estate Person ID: 900160	Agent Mrs Alison Whalley Associate Planner Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.11				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The Wiltshire Housing Site Allocations Plan Pre-Submission (Regulation 19) draft plan (WHSAP) was published for public consultation on Friday 14th July 2017 , the consultation runs until Friday 22nd September 2017.</p> <p>These representations are submitted on behalf of Longford Estate and relate to the allocation of sites and the resultant housing land supply in the Southern Wiltshire Housing Market Area.</p> <p>The WHSAP is a daughter development plan document to the adopted Wiltshire Core Strategy (2015) (WCS). The WCS set out minimum housing requirements for each of the three Housing Market Areas in the County.</p> <p>Longford Estate has commented on Table 4.1 of the WHSAP (Housing Land Supply for Wiltshire HMAs) and considered that the residual requirement for the South Wiltshire HMA be increased by 1300 homes to 1,894 to reflect that the Churchfields and Central Car Park sites in Salisbury are highly unlikely to be developed within the plan period.</p> <p>As these sites are located in Salisbury , the Principal Settlement within the South Wiltshire HMA, it is submitted that the OAN must be provided for within the plan period. The effect of the increased residual requirement in the HMA would impact on Table 4.11 of the WHSAP (South Wiltshire HMA - distribution of housing development 2006-2026) . The table sets out the developable commitments for Salisbury to be 3,833. This figure includes the Churchfields and Central Car Park allocations, despite the WHSAP stating in supporting text at paragraph 4.66 that the Churchfields allocation is expected to commence later than envisaged and much less land for new housing will be available before 2026 . Commercial space at Churchfields is available to let and there is no evidence to indicate that the decant process will commence. Similarly, the Central Car Park site is in commercial use with no evidence or application coming forward to indicate its deliverability within the plan period. Accordingly, the developable commitments for Salisbury at Table 4.11 should be reduced by 1300 to 2,533 . The removal of these commitments results in a residual requirement of 723 homes in the Salisbury and Wilton Community Area.</p> <p>Housing allocations have been proposed in the Salisbury and Wilton Community Area for 795 homes which would, if developed meet the revised OAN as suggested above. However, Longford Estate has stated in representations to the WHSAP that the Netherhampton Road site (Site S1028) should not be included as an allocation at this stage given the number of unknown and unresolved technical issues.</p> <p>Notwithstanding this, research indicates that it would be 2026 at the earliest for development to commence at Netherhampton Road (see representations made in relation to Paragraph 4 .68).</p> <p>Longford Estate can offer an opportunity for a highly sustainable, developable site (Site 3435) to deliver up to 100 homes comfortably within the plan period, to address some of the shortfall that has been identified above. Technical evidence to support the deliverability of Site 3435 is contained at Appendix 2. This site combined with the remaining allocations and windfall sites would ensure that the OAN can be addressed within the plan period and enabling further studies (particularly in relation to highways) to be undertaken at the Netherhampton Road site which could result in that site coming forward in the next plan period.</p> <p>Longford Estate consider that the developable commitments for Salisbury at Table 4.11 should be reduced by 1300 to 2,533 . The removal of these commitments results in a residual requirement of 723 homes in the Salisbury and Wilton Community Area.</p>			

	This will ensure that the plan is justified insofar as being the most appropriate strategy when considered against the reasonable alternatives , based on proportionate evidence (paragraph 182 of NPPF).
Attached files (Please see Objective)	4738363
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Longford Estate welcome the opportunity to discuss with the Inspector the merits of Site 3435 coming forward as an omission site to address the shortfall resulting in the proposed amendments detailed above.

Comment ID:	3023	Consultee Mr Charles Routh Planning and Local Government	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Natural England Person ID: 382216		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Impacts on rights of way/open space			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We note that a high proportion of the proposed sites are land which is either bisected or bounded by public rights of way or is used for recreational purposes as open space. Development of these sites is likely to detrimentally affect the recreational value of these features. (C.f. NPPF paras 74.</p> <p>Existing open space...should not be built on unless... and 75. Planning policies should protect and enhance public rights of way and access.). We note that the Wiltshire Core Strategy says (CP51 – green infrastructure) “If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.”</p> <p>We are unaware of any such audits being undertaken since the Core Strategy was adopted, and our impression is that, compensatory provision has rarely, if ever, been made.</p> <p>Whilst impacts of this kind should not preclude sites from development, they should be weighed in the site selection process (as discussed above under Strategic Environmental Assessment section), and loss resulting from the proposed development be replaced by equivalent or better provision.</p> <p>We recognise that it may be inappropriate for the Plan to specify what such compensatory provision should look like, but we are very concerned that the allocation of such sites will result in a loss of recreational amenity. As such, without confirmation that a robust approach will be taken to implementing NPPF paras 74 and 75 and CP51, we advise that the plan is unsound.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3024	Consultee Mr Charles Routh Planning and Local Government	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Natural England Person ID: 382216		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		All sites			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Natural England has previously informally provided comments on the environmental constraints associated with the various sites being proposed. None of constraints of the sites being proposed are in our view fundamentally unsuitable for development (in terms of the natural environment, and subject to the comments made elsewhere in this response). However, in addition to our earlier comments, reviewing the sites at this stage of consultation we note that site H2.4 (Church Lane) appears to be a very well used area for recreation.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3025	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner		Do you consider the draft WHSAP is legally compliant?	No										
		Longford Estate	Pegasus Planning		Do you consider the draft WHSAP is sound?											
		Person ID: 900160	Person ID: 900154													
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Positively prepared											
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.1			Justified											
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocations Plan Pre-Submission (Regulation 19) draft plan (WHSAP) was published for public consultation on Friday 14th July 2017, the consultation runs until Friday 22nd September 2017. These representations are submitted on behalf of Longford Estate and relate to the allocation of sites and the resultant housing land supply in the Southern Wiltshire Housing Market Area. The WHSAP is a daughter development plan document to the adopted Wiltshire Core Strategy (2015) (WCS). The WCS set out minimum housing requirements for each of the three Housing Market Areas in the County. Table 4.1: Housing Land supply for Wiltshire's HMAs (forecast at 1 April 2017) indicates that the remaining housing requirement in the South Wiltshire HMA is as follows:</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Requirement (at least 2006-2026)</th> <th>Completions (2006-2017)</th> <th>Developable Commitments 2017-2026</th> <th>Minimum to be allocated</th> </tr> </thead> <tbody> <tr> <td>South Wiltshire HMA</td> <td>10,420</td> <td>5,067</td> <td>4,759</td> <td>594</td> </tr> </tbody> </table>						Area	Requirement (at least 2006-2026)	Completions (2006-2017)	Developable Commitments 2017-2026	Minimum to be allocated	South Wiltshire HMA	10,420	5,067	4,759	594
	Area	Requirement (at least 2006-2026)	Completions (2006-2017)	Developable Commitments 2017-2026	Minimum to be allocated											
South Wiltshire HMA	10,420	5,067	4,759	594												
<p>Longford Estate do not agree that the Developable Commitments as set out in Table 4.1 at 4,759 is correct. This figure includes 750 (of the allocated 1100) homes at Churchfields (Salisbury) and 200 homes at the Central Car Park site (Salisbury). It is widely known that these sites have been longstanding allocations (ref. Wiltshire Core Strategy, Core Policy 20). Paragraphs 4.66 of the WHSAP confirm that Churchfields is a strategic mixed use site that, in order to be developed requires substantial employment uses to decant, and is now expected to commence "later than envisaged and much less land for new housing will be available before 2026." Commercial space at Churchfields is available to let and there is no evidence to indicate that the decant process will commence. Similarly, the Central Car Park site is in commercial use with no evidence or application coming forward to indicate its deliverability within the plan period. Longford Estate do not consider that Churchfields or the Central Car Park site should be included within the Developable Commitments as this is misleading and contrary to paragraph 14 of the NPPF which states that local planning authorities should positively seek opportunities to meet the development needs of their area and should meet their objectively assessed needs. The WHSAP acknowledges the delay in these allocations being deliverable and on this basis, Wiltshire Council has not positively sought opportunities to meet the housing needs. Longford Estate consider that the Developable Commitments in Table 4.1 to be reduced by 950 homes to 3,809. This would have the impact of increasing the residual requirement to 1,544 in the South Wiltshire HMA. This will ensure that the plan is justified insofar as being the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence (paragraph 182 of NPPF).</p>																

Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Longford Estate welcome the opportunity to discuss with the Inspector the merits of Site 3435 coming forward as an omission site to address the shortfall resulting in the proposed amendments detailed above.

Comment ID:	3026	Consultee Councillor George Jeans	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 457823	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Mere Community Area Topic Paper			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I as the local councillor consider an informative should be used in any future documents that uses the material in the paper of June 2017, under Mere Community Area, 2.4 point 4, the informative should state: Mere Town being South of the A303T is not in the AONB. This would clarify the AONB does not include the entire Mere Community Area, indeed the majority of the population do not live in the AONB.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3027	Consultee Cllr Brian Dalton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136367		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Consultation			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My first observation is the confusing, head-scratching online consultation. As a Cllr, I know of at least a dozen residents who have just given up trying to send in their comments, due to the ham-fisted, totally confusing website consultation. I also know of many who have emailed/written in their comments for the same reason. It's unacceptable for a local authority to run such a (deliberate?) confusing consultation, and these words come from resident after resident. I guess no 'plain English' award for this consultation? I've pondered over the online consultation for two nights, and will not do a third, hence it being sent by email.</p> <p>Please accept this as an objection to the council's proposal to build 740 houses on Netherhampton Rd. Let's also hope that Wiltshire council will listen to residents' concerns after this consultation ends. It's just a pity that many have been denied sending in their comment through a cumbersome online consultation.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3028	Consultee Cllr Brian Dalton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136367	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	740 houses on Netherhampton Rd: I've had no comment from any residents regarding the 100 houses at Rowbarrow, so my comments and questions lie with the two proposals for 740 houses, a small Town, on Netherhampton Rd. In fact, the proposal raises more questions, which the council so far, has been unable to answer. This alone, is enough to make these proposals unsound.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3029	Consultee Cllr Brian Dalton Person ID: 1136367	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Traffic: Just how many vehicle movements will be created from these developments onto Netherhampton Rd? Does the council think that the 'pinch points' at either end, particularly Harnham, will be able to cope? These questions have yet to have answers. Tweaking the Gyratory is no answer, unless an enormous flyover is proposed? A recent pedestrian death on Harnham Rd raises eyebrows. Residents have just endured several weeks of misery through Salisbury during the recent New Bridge Rd repairs. The council is aware of this; queues along all southern roads into and out of Salisbury; fact; most of the day long, every day. These proposals will add 1,000 vehicle movements on Netherhampton Rd and the Gyratory. Both roads cannot take this extra amount of traffic. Does the council think it can? If so, on what assumption? Just make the queue longer? It's already bottlenecked! This proposed development is a Town, added to an existing Village. It will increase Netherhampton parish tenfold. I've also just checked the definition of a Town and it's a settlement of 1,000 to 20,000 people. I would guess 1,300 people will eventually live here; likely more.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3030	Consultee Cllr Brian Dalton	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136367		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Sewerage: Is there proper provision of sewerage pipes for the extra housing here? Will existing pipework be renewed, or is 740 houses going to be connected to existing pipes? I can envisage serious problems for the existing Netherhampton Village with the connections being tenfold to existing.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3031	Consultee Cllr Brian Dalton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136367	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Rainwater drainage: Currently, rainwater will drain into the farmland on this incline. With the proposal to cover the farmland with tarmac, will the existing storm drains on Netherhampton Rd cope with the water run-off into the existing road drain system? Just where will the water run to and will Netherhampton Village be susceptible to serious flooding each time we have rain? How much water run-off will come from this site?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3032	Consultee Cllr Brian Dalton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136367	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Housing: Just what type of housing is proposed? The council must have some thought here. We need housing which is affordable for local young people to buy, and rent. Houses from £277,000, as being advertised in a development near Old Sarum, are not the houses our youngsters want, nor can afford; can they? Or do we want wealthy second-homers moving in? As a Cllr I hear this all the time and this will just add to the problem, not trying to solve it.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3033	Consultee Cllr Brian Dalton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136367	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Why more 'doughnut development'?</p> <p>Why is the council not looking at building a small town, or garden town, somewhere in Wiltshire? Many community facilities would come with this, along with new roads. And who knows, maybe some funding too? I don't believe that this has seriously been looked at by the council. Just the easy option of 'doughnut development' around existing settlements; the cheap option for the council and the worst for existing residents. This 'doughnut development' proposal will bring chaos to existing road networks, which will eventually grind to a halt, all thanks to Wiltshire council. Salisbury has seen too much of this development over the past 20 years or so. No more can be sustained, enough is enough. Just look at the road network now.</p> <p>A new Town would take all the pressure off Salisbury, and other areas across Wiltshire, giving those new residents in that new Town the community facilities which would be deserved.</p> <p>Netherhampton Rd will come with no new community facilities, except a new primary school. Doesn't the council have a prejudicial interest demanding this? What about a shop? Pub? Church? Community Hall? Plenty of green open space? These are what residents would like too, along with a bus to serve them. Is there a proposal for a bus service here? There needs to be. This major settlement will be 'cut off' from the rest; with no local buses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3034	Consultee Cllr Brian Dalton	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136367	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury.			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Has the council been monitoring roads around Harnham during the closure of New Bridge Rd recently? Total chaos. And this is exactly what Wiltshire council is proposing for 365 days of the year. Listen to residents. Consider a new town, which will also ease pressure on many other towns and villages around Wiltshire, and not cause chaos to existing areas.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3035	Consultee Land Value Alliances Ltd Land Value Alliances Ltd	Agent Mr Jonathan Chick Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136406	Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We write on behalf our client Land Value Alliances (LVA) in relation to the above consultation on the Wiltshire Site Allocations Development Plan Document 'SADPD' (June 2017). LVA have a general interest in Wiltshire Council's forward planning but specifically in relation to Land at Sandlease Farm, Worton as edged red on the attached site location plan (Appendix 1). Where relevant this letter will highlight the potential for residential development on this land.</p> <p>It is noted that the draft SADPD only proposes site specific allocation policies which will supplement the strategic policies in the Wiltshire Core Strategy. The draft SADPD does not propose to allocate sites to deliver the overall housing requirement for the East Housing Market Area in large villages such as Worton as part of this process, and instead leaves 'local needs' to be delivered by communities through Neighbourhood Plans.</p> <p>LVA acknowledge that neighbourhood plans can be used as a vehicle to deliver housing need for large villages, but consider that further sites in should be allocated in the SADPD now to ensure a flexible supply of housing to meet future requirements, for the following reasons:</p> <ul style="list-style-type: none"> The status of the new SHMA and partial WCS review which could have implications on the OAHN in Wiltshire; The flexible approach endorsed in the adopted WCS which suggests the overall housing requirement is a 'minimum' with 'indicative' requirements for each Community Area; The doubts about the delivery of some sites in the East HMA and their build out rates; Concerns regarding the suitability of sites proposed as allocations in Market Lavington. <p>On this basis LVA consider that the Plan is unsound as currently drafted as it is not justified or consistent with national policy. To make the Plan sound further sites should be allocated to ensure a flexible supply of deliverable sites are available in the plan period.</p> <p>This is particularly the case for the East HMA which includes Worton, a large sustainable village. As set out in the following sections Land at Sandlease Farm in Worton can accommodate residential development which can make an important contribution to the housing supply in the East HMA. These representations are supported by an illustrative masterplan (Appendix 2) and baseline assessments (Appendix 3-8) which help to confirm the sites overall acceptability.</p> <p>The Wiltshire Core Strategy (WCS) was adopted in January 2015 and sets out the strategic vision for delivering sustainable growth over the period up to 2026. A Neighbourhood Plan (NP) is currently being prepared in Worton and Land at Sandlease Farm is being considered as an option for residential development. The purpose of the Wiltshire SADPD is to:</p> <ul style="list-style-type: none"> Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three Housing Market Areas (HMAs) over the period to 2026. 				
Attached files (Please see Objective)	4739516 / 4739520 / 4739518 / 4739513 / 4739517 / 4739519 / 4739515 / 4739514				

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

A number of issues are raised in the representation letter regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.

Comment ID:	3036	Consultee Terra Strategic Ltd Person ID: 1136436	Agent Ms Rosie Dinnen Associate Director TETLOW KING PLANNING Person ID: 1135353	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Plan Period Whilst it is acknowledged that the proposed timeframe of the Draft Site Allocations Plan is aligned to the plan period of the Wiltshire Core Strategy and Chippenham Site Allocations Plan (2006 – 2026), NPPF Paragraph 157 states that Local Plans should: "be drawn up over an appropriate time scale, preferably a 15-year time horizon, to take account of longer term requirements, and be kept up to date" Once adopted, which according to the approved updated Local Development Scheme on has an anticipated adoption date of Winter 2018, the Site Allocations Plan would have a maximum time horizon of just eight years: half of what is expected by the NPPF. This consultation arrives at a time where the partial review to the Core Strategy should be at an advanced stage of its review. However, the partial review is yet to commence. In addition, it is questioned whether planning for just eight years in advance of its adoption really takes account of "longer term requirements", as outlined in Paragraph 182. With the plan period commencing in 2006 indicates that the Draft Site Allocations Plan is more retrospective than forward-thinking. On this basis it is considered that the provision of an eight year time horizon is not consistent with national policy, nor will this timeframe be effective. Moreover, covering a plan period all the way back to 2006 does not indicate that the plan has been positively prepared with much forethought. As such this element of the Draft Site Allocations Plan already fails the tests of soundness. Summary In order to make the Draft Site Allocations Plan sound, the Council needs to increase the proposed plan period: if the intentions of the Council to adopt the plan in Winter 2018 are correct, this would mean that the document would have a foresight of just eight years, and currently presents a more retrospective picture. RE: LAND WEST OF SEMINGTON ROAD, MELKSHAM On behalf of our client, Terra Strategic Ltd, who has an interest in land to the west of Semington Road, Melksham, Tetlow King Planning is instructed to make a representation on the Draft Wiltshire Site Allocations Plan. We also enclose a completed copy of the representation form. The site has recently been subject to a planning application (ref. 17/0195/OUT) for residential development and a site location plan is enclosed. The production of the Site Allocations Plan is welcome and as it will provide greater certainty for housing delivery in Wiltshire. However, the plan's production is long overdue due to protracted delays in examination and adoption of both the Core Strategy and the Chippenham Site Allocations Plan. In the absence of a Site Allocation Plan, Wiltshire Council has not been able to demonstrate that they have a five year housing land supply and consequently the Council has been operating in a planning by appeal system whereby planning permissions have been granted for residential development in locations where development would not normally be permitted (i.e. unsustainable locations). Due to the absence of an up-to-date development plan, several recent appeal decisions, and indeed Council own decisions, have been approved contrary to the development plan, therefore undermining the primary importance of development plan in decision making as stipulated by Section 38(6) of the Planning and Compulsory Purchase Act 2004.				

	<p>Furthermore, delays in the partial review of the Core Strategy have further hindered Wiltshire achieving an up-to-date development plan and again undermines plan-led process in decision making. Indeed the Council's commitment to an early partial review of the Core Strategy was a determining factor in the Inspector's report recommendation adoption of the Core Strategy subject to main modifications.</p> <p>These representations have been prepared having regard to the wider planning policy context for Wiltshire and the tests of soundness i.e. a 'sound' local plan should be positively prepared; justified; effective; and consistent with national policy.</p> <p>For the reasons that are established below, it is considered that the emerging Wiltshire Site Allocations Plan does not meet the tests of what a 'sound' Plan should comprise. The inclusion of our site at Melksham would ensure that a sufficient supply of housing will be delivered to the town and would meet an emerging need for new housing in the Chippenham and Trowbridge Housing Market Areas – as established by the forthcoming Strategic Housing Market Assessment (see explanation below).</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>In light of the ongoing promotion of the site for residential development our client is keen to engage in the process on further stages of the Site Allocations Plan and emerging planning policy in Wiltshire. We would therefore like to be consulted on further stages of the Site Allocations Plan and other related publications,</p>

Comment ID:	3037	Consultee Terra Strategic Ltd Person ID: 1136436	Agent Ms Rosie Dinnen Associate Director TETLOW KING PLANNING Person ID: 1135353	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Melksham</p> <p>Melksham is a key market town in Wiltshire, a high order settlement in the Settlement Strategy (Core Policy 1) in recognition of its sustainability credentials in terms of the employment opportunities, provision of a wide of services and facilities to sustain housing. Therefore it is a significant shortcoming that the Draft Wiltshire Site Allocation Plan does not allocate any new homes.</p> <p>With regard to the town's role in the Core Strategy, we note that whilst the examining Inspector determined that the Council's decision to not identify a strategic allocation for Melksham at the time of adoption was "on balance, warranted" , the Inspector was concerned about housing delivery in the latter part of the plan period. Paragraph 288 of the Core Strategy Inspector's report states:</p> <p>"Whilst, in the shorter term, there appears to be sufficient commitments to ensure an adequate supply of housing land for the town, there is a notable degree of uncertainty for the latter part of the plan period. The Council acknowledged in its Position Statement the scope for a Sites DPD to assist in delivering such housing which, given my earlier comments in relation to overall housing numbers for the county, seems to be the most pragmatic and efficient way of complementing the neighbourhood planning process to ensure the provision of sufficient housing to meet identified needs in a timely fashion..."</p> <p>Now we are in the "latter stages" of the respective plan periods of the Draft Site Allocations Plan, it appears that no sites in Melksham have been allocated. This was an assumption made by the Inspector and Wiltshire Council that a Sites DPD would allocate relevant sites to make up local need, which it has failed to include.</p> <p>The Inspector also notes that the Neighbourhood Planning process would assist in allocating sites in Melksham Community Area. Following an online review of Steering Group minutes, it appears that we are no closer to viewing a draft version of a Neighbourhood Plan than when the Inspector issued his report in December 2014. As a result we are unable to conclude whether a Melksham Neighbourhood Plan will be allocating any housing sites up to 2026.</p> <p>Whilst the Melksham Topic Paper establishes that the indicative residual requirement for the Melksham Community Area has been met, it has been written as though a housing moratorium has been placed on the town – indicating that the town is full up and no more housing should be built here.</p> <p>It is important to highlight that the absence of any site Melksham-related site assessments in the Topic Paper does not reflect the 'positive', 'forward' planning advocated by national planning guidance. The NPPF establishes a responsibility on local planning authorities to "boost significantly" the supply of housing: essentially putting a cap on development up to 2026 in Melksham does not represent positive planning, or 'significantly' boosting housing supply in the town. It is important to note that the residual housing requirement established in the Topic Paper does not represent a cap on development, nor does it indicate that no more additional new homes are required. Core Policy 2 refers to 'at least 42,00 homes' and a minimum housing requirement for the three Housing Market areas and west of Swindon. The figures identified for Melksham Town and Melksham remainder is expressed as an 'indicative requirement'. There is a swathe of evidence which outlines that such</p>				

housing requirements and the demonstration of a five year housing land supply should not represent a ceiling for new development, they should represent approximate targets which can be exceeded.

An example of this includes an appeal at Shurnhold, Melksham (ref. 3132915 – Appendix I) where the Inspector presiding over the appeal acknowledged that matters were "finely balanced", but stated that the cumulative impacts outweighed the benefits: leading to dismissal.

Despite the dismissal of the appeal, the Inspector concluded that the Council was unable to demonstrate a five year housing land supply, and that the requirement of 6,822 homes within the relevant five year period was "not a maximum", nor a "ceiling" (Paragraph 66).

A more recent example was the Secretary of State's (SoS) decision at Boreham Road, Warminster in July 2017 (ref. 3150774, attached at Appendix II) where at Paragraph 17 he notes (our emphasis added):

"He concludes that the Council can demonstrate a 5 year supply of housing land and, therefore, the fourth bullet point of paragraph 14 of the Framework is not engaged. However, he considers that this does not negate the benefits arising from the proposed development, particularly the contribution to custom built housing and affordable housing. In line with paragraph 47 of the Framework, which requires local authorities to boost significantly the supply of housing, he takes the view that the five year requirement is a minimum and not a cap."

Drawing the above comments together, it is disappointing to see that the Council considers that Melksham has 'reached capacity' by fulfilling its residual requirement up to 2026: which does not accord with the principles of the NPPF. The plan is more of a monitoring document than one that looks ahead for new development. As such, the emerging Site Allocations Plan has not been positively prepared, nor is it consistent with national policy, effective and justified.

Summary

In consideration of the Inspector's findings during the examination of the Wiltshire Core Strategy it is unusual not to see any allocated sites in Melksham, considering the assumption between the Council and the Inspector that a Sites DPD and the Neighbourhood Planning process would contain prospective sites. The Inspector expressed his concerns at the lack of housing sites in the longer term, and there seems to be no emerging sites coming forward via the neighbourhood planning route – in which a draft document is yet to be published. As highlighted above Melksham town is an example of the disorderly 'planning by appeal system' which operates in Wiltshire. Consequently, Melksham's growth is being artificially constrained and the Council is not planning for its future and an opportunity is being missed.

RE: LAND WEST OF SEMINGTON ROAD, MELKSHAM

On behalf of our client, Terra Strategic Ltd, who has an interest in land to the west of Semington Road, Melksham, Tetlow King Planning is instructed to make a representation on the Draft Wiltshire Site Allocations Plan. We also enclose a completed copy of the representation form. The site has recently been subject to a planning application (ref. 17/0195/OUT) for residential development and a site location plan is enclosed. The production of the Site Allocations Plan is welcome and as it will provide greater certainty for housing delivery in Wiltshire. However, the plan's production is long overdue due to protracted delays in examination and adoption of both the Core Strategy and the Chippenham Site Allocations Plan. In the absence of a Site Allocation Plan, Wiltshire Council has not been able to demonstrate that they have a five year housing land supply and consequently the Council has been operating in a planning by appeal system whereby planning permissions have been granted for residential development in locations where development would not normally be permitted (i.e. unsustainable locations). Due to the absence of an up-to-date development plan, several recent appeal decisions, and indeed Council own decisions, have been approved contrary to the development plan, therefore undermining the primary importance of development plan in decision making as stipulated by Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Furthermore, delays in the partial review of the Core Strategy have further hindered Wiltshire achieving and up-to-date development plan and again undermines plan-led process in decision making. Indeed the Council's commitment to an early partial review of the Core Strategy was a determining factor in the Inspector's report recommendation adoption of the Core Strategy subject to main modifications.

These representations have been prepared having regards to the wider planning policy context for Wiltshire and the tests of soundness i.e. a 'sound' local plan should be positively prepared; justified; effective; and consistent with national policy.

For the reasons that are established below, it is considered that the emerging Wiltshire Site Allocations Plan does not meet the tests of what a 'sound' Plan should comprise. The inclusion of our site at Melksham would ensure that a sufficient supply of housing will be delivered to the town and would meet an emerging need for new housing in the Chippenham and Trowbridge Housing Market Areas – as established by the forthcoming Strategic Housing Market Assessment (see explanation below).

Attached files (Please see Objective)	4739141 / 4739139
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In light of the ongoing promotion of the site for residential development our client is keen to engage in the process on further stages of the Site Allocations Plan and emerging planning policy in Wiltshire. We would therefore like to be consulted on further stages of the Site Allocations Plan and other related publications,

Comment ID:	3038	Consultee Terra Strategic Ltd Person ID: 1136436	Agent Ms Rosie Dinnen Associate Director TETLOW KING PLANNING Person ID: 1135353	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire and Swindon Joint Spatial Framework In partnership with Swindon Borough Council, Wiltshire Borough Council is preparing a joint spatial planning framework in order to guide new development up to 2036. In a recent Cabinet meeting on 12 September, Wiltshire Council resolved to agree an updated Local Development Scheme for the future programme of preparing Development Plan Documents.</p> <p>In support of the preparation of a joint spatial framework with Swindon Borough Council, the Agenda confirms that there will be a new Strategic Housing Market Assessment (SHMA) and Functional Economic Market Area Assessment (FEMAA) for both authorities, in which draft versions have been considered at a joint meeting on 18 September 2017. The Cabinet Agenda suggests that a Regulation 18 public consultation is due in Q4 of 2017, which will include a proposed Scope of the Plan, the new SHMA and FEMAA, and a fresh Call for Sites.</p> <p>We note at Paragraph 19 of the Cabinet Agenda that the SHMA and FEMAA propose new Strategic Housing Market Areas (HMAs) – based around Chippenham, Salisbury, Swindon and Trowbridge, and has formed the basis against which policy officers in both authorities have been working towards.</p> <p>Melksham town is strategically located between the two proposed HMAs of Chippenham and Trowbridge: thus elevating its importance within wider Wiltshire. This has significant implications for the town as it will be viewed by Wiltshire Council and Swindon Borough Council as a strategically significant settlement which will be pivotal in accommodating further growth from Chippenham and Trowbridge. Due to its location between two of Wiltshire’s most principal settlements, the town of Melksham will inevitably need to grow further, leading to the allocation of more residential and commercial sites within and around the town and our clients site is ideally located to facilitate this growth.</p> <p>Summary In light of the prospective elevated status of Melksham as a town through the emerging SHMA and FEMAA and the Council’s Joint Spatial Framework with Swindon Borough Council, it is inevitable that more sites will need to be directed towards Melksham in the longer term. As such this representation has adequately demonstrated why our site should be included as an allocation within the Draft Site Allocations Plan. The site is available for development, now.</p> <p>RE: LAND WEST OF SEMINGTON ROAD, MELKSHAM</p> <p>On behalf of our client, Terra Strategic Ltd, who has an interest in land to the west of Semington Road, Melksham, Tetlow King Planning is instructed to make a representation on the Draft Wiltshire Site Allocations Plan. We also enclose a completed copy of the representation form. The site has recently been subject to a planning application (ref. 17/0195/OUT) for residential development and a site location plan is enclosed. The production of the Site Allocations Plan is welcome and as it will provide greater certainty for housing delivery in Wiltshire. However, the plan’s production is long overdue due to protracted delays in examination and adoption of both the Core Strategy and the Chippenham Site Allocations Plan. In the absence of a Site Allocation Plan, Wiltshire Council has not been able to demonstrate that they have a five year housing land supply and consequently the Council has been operating in a planning by appeal system whereby planning permissions have been granted for residential development in locations where development would not normally be permitted (i.e. unsustainable locations). Due to the absence of</p>			

	<p>an up-to-date development plan, several recent appeal decisions, and indeed Council own decisions, have been approved contrary to the development plan, therefore undermining the primary importance of development plan in decision making as stipulated by Section 38(6) of the Planning and Compulsory Purchase Act 2004.</p> <p>Furthermore, delays in the partial review of the Core Strategy have further hindered Wiltshire achieving and up-to-date development plan and again undermines plan-led process in decision making. Indeed the Council's commitment to an early partial review of the Core Strategy was a determining factor in the Inspector's report recommendation adoption of the Core Strategy subject to main modifications.</p> <p>These representations have been prepared having regards to the wider planning policy context for Wiltshire and the tests of soundness i.e. a 'sound' local plan should be positively prepared; justified; effective; and consistent with national policy.</p> <p>For the reasons that are established below, it is considered that the emerging Wiltshire Site Allocations Plan does not meet the tests of what a 'sound' Plan should comprise. The inclusion of our site at Melksham would ensure that a sufficient supply of housing will be delivered to the town and would meet an emerging need for new housing in the Chippenham and Trowbridge Housing Market Areas – as established by the forthcoming Strategic Housing Market Assessment (see explanation below).</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>In light of the ongoing promotion of the site for residential development our client is keen to engage in the process on further stages of the Site Allocations Plan and emerging planning policy in Wiltshire. We would therefore like to be consulted on further stages of the Site Allocations Plan and other related publications,</p>

Comment ID:	3039	Consultee Terra Strategic Ltd Person ID: 1136436	Agent Ms Rosie Dinnen Associate Director TETLOW KING PLANNING Person ID: 1135353	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land West of Semington Road, Melksham</p> <p>The development of our client's site to the west of Semington Road, Melksham would assist the Council in achieving its spatial priorities in the Site Allocations Plan and the joint spatial planning framework.</p> <p>The site extends to approximately 4.8ha and is situated to the south-west of Melksham, immediately adjacent to the existing settlement boundary. The site itself is flat and constraint free. It is a self-contained site with well defined defensible boundaries, which are screened by mature vegetation. The site is within Flood Zone 1.</p> <p>The site is in a sustainable location within walking distance to facilities in Melksham town centre and Berryfield to the south. The site has excellent bus links with the X34 providing a regular long service bus route which connects Melksham to Chippenham, Trowbridge and Frome. Semington Road also forms part of the 403 National Cycle network. Melksham Railway Station is just over a mile away and the site has excellent connectivity by car.</p> <p>The site benefits from ample employment opportunities in the locality. As well as the Town Centre, employment opportunities exist along Hampton Park West (for example the Evans Business Centre and the Ashville Centre) along Semington Road to the south, and at Bowerhill in the east.</p> <p>In assessing the Principle of Development, the findings of the 2012 SHLAA cannot be ignored. Within its assessment of the site (ref. Site 728), Wiltshire Council identified the site as suitable, available, and deliverable within five years. As footnote of NPPF Paragraph 47 highlights that to be considered deliverable, sites "should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable". The development of the site would fulfil those requirements.</p> <p>The SHLAA also recognises that the site is in single ownership, therefore can be delivered without difficulty and has the capacity for approximately 103 dwellings.</p> <p>In considering the suitability of the scheme in principle, another important element is the Melksham Link Project, as established in Wiltshire Core Strategy Policy 16. The most up-to-date plans of this project outline the proposed route of the canal running to the West of the site, and designate the site for new residential development. The proposal will not hinder the future development of the proposed canal.</p> <p>In terms of the local landscape, the site contains a low-level landscape perceived as an extension to the host town of Melksham as opposed to Berryfield in the south. This was established within the Landscape and Visual Impact Assessment which concluded that development "would not be perceived as significantly closing the gap between Berryfield and Melksham or be perceived as coalescing the individual settlements, particularly with the retention and enhancement of the southern boundary vegetation as part of the mitigation measures".</p> <p>Our client's site is situated immediately adjacent to the existing settlement boundaries. The Site Allocations Plan proposes to review the settlement boundaries across Wiltshire and therefore it is an ideal opportunity to include our client's site within the new defined boundaries for Melksham.</p>				

	<p>Indeed several precedents have previously been established for developing beyond the settlement boundaries. Planning permission has been granted on land to the south of Western Way, Bowerhill (reference 16/01123/OUT). This site had been historically preserved from development to avoid coalescence with Bowerhill. This decision therefore sets an important precedent for developing to the south of the Melksham Ring Road (A350), which has previously defined the urban edge of Melksham.</p> <p>An outline planning application for residential development was submitted for the site earlier this year (ref. 17/0195/OUT). Whilst the application was refused by the Council, the grounds for refusal were primarily on 'in principle' grounds as the site is located outside of the defined settlement limits of Melksham. However, as outlined above the site is constraint free and in a sustainable location and therefore forms a logical extension to Melksham.</p> <p>The outline planning application included an indicative layout plan that demonstrated that the site had capacity to accommodate 160 dwellings. Revised plans are currently being prepared for a reduced number of units more in line with the SHLAA capacity of 103 units.</p> <p>Moreover, the Council also recently approved an outline application for the erection of up to 150 dwellings on land to the east of Semington Road, to the south of the proposed boundary. Although it should be noted that this site is further removed from the existing settlement boundary for Melksham than our client's site and has a closer relationship with Berryfields.</p> <p>As the Site Allocations Plan is reviewing the settlement boundaries across Wiltshire, it seems odd that the two Melksham examples have been deliberately excluded from the revised settlement boundary for Melksham. Therefore the rationale for approving these planning applications beyond the settlement boundaries seems unjustified as the settlement boundaries have not be adjusted to include these sites.</p> <p>As a result, the settlement boundaries for Melksham and Bowerhill as presented in the Draft Site Allocations Plan are out of date and do not allow for further housing growth, and so these boundaries are not effective and not justified. Accordingly the settlement boundaries should be reviewed to include our client site which is immediately adjacent to the existing settlement boundary and forms a logical extension to the town and we enclose a plan indicating the revised boundary.</p> <p>The provision of new residential development adjacent to Melksham – a Market Town that is capable of facilitating "significant" growth – complies with the overarching aims and objectives of Core Policy 1 and Core Policy 2 of the Wiltshire Core Strategy. In addition, the added importance of the town through the development of new HMAs at Chippenham and Trowbridge further project its importance as a strategic settlement within Wiltshire. As a result, the site is sustainably located, in close proximity to Melksham Town Centre and a suitable highways network.</p> <p>Summary Moreover, the site boundaries of Melksham and Bowerhill need to be amended to include our client's site and a plan of the revised boundary is enclosed.</p>
Attached files (Please see Objective)	4739142 / 4739140
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In light of the ongoing promotion of the site for residential development our client is keen to engage in the process on further stages of the Site Allocations Plan and emerging planning policy in Wiltshire. We would therefore like to be consulted on further stages of the Site Allocations Plan and other related publications,

Comment ID:	3040	Consultee De Vernon Trustees De Vernon Trustees Person ID: 556491	Agent Mr Thomas Rumble Woolf Bond Planning Person ID: 901380	Do you consider the draft WHSAP is legally compliant?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy			Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	No Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Site Allocations Plan – Pre-Submission Draft Plan (June 2017) Land to the north of Leafield Industrial Estate, Corsham</p> <p>We write on behalf of our client, De Vernon Trustees, with regard to the current consultation on the Wiltshire Housing Sites Allocations Plan. We object to the pre- submission draft plan, in particular its failure to identify housing allocations in the Corsham Community Area.</p> <p>Our client’s interest at land north of Leafield Industrial Estate, Corsham should be included in the Wiltshire Housing Site Allocations Plan (hereon referred to as ‘the Plan’) as a residential allocation for approximately 140 no. dwellings.</p> <p>Introduction</p> <p>The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be “sound” a Local Plan should be positively prepared, justified, effective and consistent with national policy.</p> <p>In order to be justified, a development plan must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.</p> <p>Accordingly, in order to be sound, the Wiltshire Housing Site Allocation Plan needs to comply with the NPPF in respect of meeting objectively assessed development needs in full.</p> <p>For the reasons set out in this paper there are a number of shortcomings with the Plan, as currently drafted, that result in the need for amendment.</p> <p>Policy H2 (Allocations in the North and West Housing Market Area), supporting Table 4.10 and supporting paragraph 4.50</p> <p>Wiltshire County consists of three housing market areas each with varying minimum housing requirements. These representations focus primarily on the North and West Wiltshire Housing Market Area (‘HMA’), where our client’s site is located. For the reasons set out below, we object to the proposed housing allocations and the Council’s decision to not identify housing allocations at Corsham.</p> <p>Positively Prepared Plan and the Duty to Cooperate</p> <p>Paragraph 182 of the NPPF requires the Plan to be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</p> <p>The North and West Wiltshire HMA borders four different Local Planning Authorities – North Somerset, South Gloucestershire, Bath & North East Somerset, and the Cotswolds. Paragraph 1.11 of the draft Plan states:</p> <p>‘The Council engaged with neighbouring authorities and statutory consultees throughout the preparation of the Wiltshire Core Strategy, which sets the framework for this Plan. They supported the spatial strategy and quantum of development throughout the WCS preparation process. The spatial strategy and quantum of development can be considered to involve strategic issues where the duty to cooperate has already been fulfilled through the Core Strategy process.’</p>				

We have examined the housing land supply documents in the above authorities and note that: North Somerset's housing requirement for the period 2006 to 2026 is 20,985 dwellings. The five year supply calculations show a backlog of 2,692 dwellings resulting in a five year requirement of 7,937 dwellings. When compared with supply figures, the Council claims a 5.15 year housing land supply. This represents a marginal position and if a 20% buffer were applied, the Council would have a housing land supply deficit. South Gloucestershire's latest available Annual Monitoring Report shows that the Council is unable to demonstrate a five-year land supply with only a 4.54 year supply. (South Gloucestershire Council AMR 2016)

Cotswold District Council suggest they can demonstrate a 7.54 year land supply in their emerging local plan, which is currently being examined. The Inspector has raised several questions regarding this claim, particularly in reference to relying on a single large housing allocation, and the assumptions made behind the windfall allowance. (Cotswold DC LP Examination – Inspector's Matters, Issues & Questions for Examination (Sept 2017))

Bath and Northeast Somerset calculates its five year supply of housing against the target of 13,000 dwellings over the period 2011 to 2029. The council's latest housing trajectory suggests a five year supply of 2,558 years, equating to an approximate housing land supply of 3.54 years. It is clear from the above, that the neighbouring authorities are struggling to fully meet their housing needs and many are relying upon large strategic allocations to do so. Development of large strategic sites is often delayed and results in altered housing delivery trajectories, which often expose the Local Planning Authorities to potential housing land supply deficits.

The above position suggests a potential future need for Wiltshire County to potentially accommodate other Authorities' needs and furthers the importance that this plan identifies sufficient housing to go beyond identified minimum housing requirements. This can be achieved through the formal allocation of more sites, that would in turn create a more flexible (and therefore sound) development plan.

Justified Plan

The NPPF requires the plan to be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Housing Need in Wiltshire County

Core Strategy Policy CP 2 (Delivery Strategy) provides for a minimum housing requirement of 42,000 dwellings (2,100 dwellings per annum) in Wiltshire over the plan period 2006 to 2026. In addition, Policy CP 11 (Spatial Strategy for the Corsham Community Area) requires approximately 1,220 new dwellings to be delivered at Corsham town.

As a further contextual point, the Government's recent "Planning for the right homes in the right places: consultation proposals" (September 2017) document consulted on a number of potential changes to national planning policy and guidance. One measure included a consultation upon a new standardised methodology towards calculating local housing need. This document was supported by a table that provided an "Indicative assessment of housing need based on proposed formula, 2016 to 2026 (dwellings per annum)" for every Local Authority in the country. The identified figure for Wiltshire is 2,227 dwellings per annum. This suggests an underlying increased housing need for the County when compared to the current Core Strategy (2,100dpa) housing requirement.

There are two important points that arise from the above discussion. First, the Wiltshire Core Strategy housing requirement (and the resulting community area targets) are minimum housing requirement figures. It follows that an element of flexibility must be inserted into the resulting identified supply in order to meet these minimum needs. Such an approach is consistent with NPPF paragraph 47 that requires Local Authorities to boost significantly the supply of housing and that the five year requirement is to be treated as a minimum not a cap (Consistent with SoS Appeal Decision (Ref: APP/Y3940/W/16/3150774)). Second, when the Council finally review the Core Strategy housing requirement (not scheduled to occur in the short term), it is likely that the true objectively assessed need will have increased yet further, as evidenced by the higher figure identified in the Government's recent consultation. This furthers the necessity for the plan to go beyond minimum requirements and introduce flexibility now so to avoid an accumulated backlog when the Core Strategy housing requirement is finally reviewed.

The need for allocations at Corsham

Table 4.10 of the Plan refers to an indicative requirement of 1,220 dwellings at Corsham town over the period 2006 to 2026 as originally identified in the Core Strategy. Table 4.10 then goes onto identify that 1,233 dwellings have either been completed or form developable commitments at Corsham town over that period, resulting in a surplus of 13 units or a variation of 1%. Paragraph 4.50 then goes onto state: 'Until very recently there has been a shortage of development opportunities in the town. It is difficult to substantiate a direct connection, but this shortage may also have contributed to the higher than anticipated rates of development experienced by Calne, neighbouring Chippenham.

Higher rates of development than expected cause concern about the adequacy of local infrastructure to support population growth and about environmental impacts. No allocations are proposed in the Plan for Calne or Corsham' (Our emphasis).

The discussion in the below section confirms that when the actual developability of the suggested supply at Corsham over the plan period is analysed, there is a quantifiable shortfall between suggested commitments and the Core Strategy housing requirement. In the case of Corsham, rather than going beyond the minimum allocated figure, the Council are therefore actually planning for housing delivery below the requirement. This alone is unsound and justifies a need to allocate additional housing at Corsham. A flexibility level similar to Calne (23%) would be far more appropriate. In addition, one must then remember that the overall true housing need in Wiltshire is higher than that set out in the Core Strategy. Again this justifies a need to introduce a greater element of flexibility and allocate beyond the originally identified levels of housing growth at Corsham.

We also refer to the neighbouring Chippenham Community Area, where we have also identified that much of the suggested supply is not truly developable. As illustrated in Figure 4.1a (Wiltshire Key Diagram) in the Core Strategy, Corsham lies on a 'primary route network', a strategic bus route and has a potential railway station. It is the closest settlement of any notable size to Chippenham and represents the most logical alternative settlement to account for under delivery at Chippenham. The Corsham housing figure is not capped and the settlement has a separate market that can supplement the Chippenham market. This point again re-asserts the need to identify housing allocations at Corsham. Appropriateness of Allocations at Nos.H2.10, 2.11, 2.12, 2.13 & H2.14

As a matter of principle, we strongly object to these proposed allocations, that all occur at identified 'Larger Villages'. The NPPF Core Planning Principles require that plan making decisions should actively manage patterns of growth and focus significant development upon locations which are sustainable. The identification of allocations at 'Larger Villages', particularly in the Chippenham Community Area (that as discussed below is failing to deliver at necessary rates) yet the exclusion of Corsham - an identified 'Market Town' is inconsistent with national policy and does not represent a justified plan when considered against the reasonable alternative of identifying housing allocations at Corsham.

Infrastructure Constraints

Paragraph 4.50 of the plan states that higher rates of development than expected at Calne and Chippenham, cause concerns regarding the adequacy of local infrastructure to support population growth and potential environmental impacts. No allocations are therefore proposed at Calne or Corsham partly on this basis.

We strongly object to this infrastructure led reason to constrain housing growth. Paragraph 5.62, bullet point 6 of the Wiltshire Core Strategy clearly states that it is developer contributions from future housing that will help to deliver necessary infrastructure in Corsham. The Core Strategy also states that additional community and health facilities are needed, including a permanent and centrally located ambulance standby point in the town. Furthermore, the Core Strategy refers to the potential reopening of Corsham railway station that would act as a significant boost to local businesses and should remain a priority. Such infrastructure and a possible reopening of the train station can only be achieved by assuring that there is sufficient developable land available in Corsham. The provision of such infrastructure could be funded through a revised Regulation 123 list or site specific Section 106 contributions. Ultimately, there is absolutely no evidence that infrastructure constraints justify capping housing growth in this area and the plan is unjustified in this respect.

Effective Plan

The NPPF states that the plan should be deliverable over its full plan period and based on effective joint working on cross-boundary priorities. Having specific regard to the North and West Wiltshire Housing Market Area and Policy H2, the plan proposes housing allocations totaling 1,195 units and claims that it over provides across the market area.

However, there are several fundamental weaknesses in the above claimed position, particularly in the relevant Corsham and Chippenham areas. These are discussed in turn below.

Housing Commitments at Corsham

There are two particular sites in Corsham that contribute to the Council's suggested housing supply that we have concerns with:

Land South East of MoD Copenacre, Bath Road, Corsham – This site is scheduled to deliver 29 dwellings. However it forms identical land to that at the site named 'Land at Copenacre, Bath Road' also included in the Council's supply schedule to deliver 100 units under outline permission reference N/12/00836/OUT. A detailed review of the planning history has been undertaken and only 96 dwellings are set to come forward from this land. Consequently the overall contribution from both these sites should be reduced by 33 units. The inclusion of this site therefore results in double counting and the site should not appear in the land supply alongside the original outline planning permission commitment.

Old Glove Factory, Adjacent to 25 Brockleaze – The original outline permission at the site expired in February 2017. In the absence of a planning permission, this site should not be included as a commitment and its contribution (10 units) should be removed in full. It should also be noted that an additional site at Hangers 18 – 20, Colerne Industrial Park in the wider Corsham area no longer benefits from a planning permission and again should not be included as a commitment.

The above evidence provides that the 1% flexibility between the Council's suggested commitments and the minimum Core Strategy housing target that the Council asserts is in fact incorrect and the total commitments are actually below the Core Strategy housing requirement. Consequently the plan as drafted fails to even meet the defined minimum housing target for Corsham. This cannot be sound when compared to the logical alternative of identifying additional allocations at Corsham now. We strongly object to the plan for this reason.

Housing Commitments at Chippenham and across the HMA

The Council relies heavily on completions from large and strategic sites over the remaining nine years of the plan period. There are a number of sites which are unlikely to deliver in line with the Council's stated trajectories:

Land at North Chippenham – Outline planning permission (LPA Ref.: N/12/00560/OUT) for up to 750 dwellings was granted in February 2016. However, no Reserved Matters application has yet been submitted. This site has to deliver a significant piece of infrastructure in the form of an extension of the existing A350 ring road. There is therefore significant doubt as to whether the site will be developable in full inside the plan period.

Policy CH1 of the adopted Chippenham Site Allocations Plan allocates the South West Chippenham site for up to 1,000 dwellings. An outline permission for a mixed use urban extension (LPA Ref.: 14/12118/OUT) was granted in March 2017. There remains a need to undertake further public engagement, prepare and approve reserved matters applications, discharge multiple conditions, undergo site preparation and clearance works, alongside potential delays associated with existing uses on the land and/or necessary substantial infrastructure works. There is no further application submitted either for reserved matters or discharging of conditions. The Council's suggestion that delivery will occur in this monitoring year is therefore wholly unrealistic. As a best case scenario, first completions may come forward in 2020/21 such that the Council's trajectory is overly optimistic and 340 units of the suggested supply are not developable within the plan period.

Policy CH2 allocates approximately 50ha of land at Rawlings Green. The outline application for up to 700 dwellings (LPA Ref.: 15/12351/OUT) is yet to be determined. Furthermore, the allocation policy itself restricts the development to 200 dwellings in the first phase. This is due to the requirement to complete a bridge over the existing railway and the completion of the so called 'Cocklebury Ring Road'. The completion of this scheme by 2024 and first completions in 2018/19 is overly optimistic, considering the complexity of the infrastructure needed and likely resulting procedural delays.

Land South East of Trowbridge – Outline application for mixed use development with up to 2,500 dwellings (LPA Ref.: 15/04736/OUT) has been submitted, but remains undetermined 2 years on. This is unlikely to be determined in the near future. The Council's trajectory suggests that 1,600 dwellings will be delivered at this site by 2026 and 100 completions will come forward in 2019/20. Subsequent to any potential outline permission, there will then be a selling process in order to identify housebuilders for the scheme, a need to undertake further public engagement, prepare and approve reserved matters applications, discharge multiple conditions, undergo site preparation and clearance works, alongside potential delays associated with existing uses on the land and/or necessary substantial infrastructure works. We therefore consider that whilst some works may occur inside the 5 year period, the site cannot be relied upon to deliver any housing completions inside the immediate 5 year period. We therefore consider that only 850 dwellings could come forward from this site in the plan period (with first completions coming forward in 2022/23). This results in a reduction in developable supply by 750 units.

Two key points arise from the above discussion. First, there is a quantifiable need both in the Corsham and neighbouring Chippenham area to identify additional housing allocations in order to meet the minimum housing targets set out in the Core Strategy. Second, there is a significant risk in the Council's delivery strategy, especially at Chippenham in placing an over reliance upon strategic sized sites. Such sites suffer from significant lead in times prior to delivery are therefore at considerable risk of delay. It follows that there is no flexibility built into the plan, should any component of supply be delayed or fail to deliver. This does not form a justified delivery strategy, when considered against the reasonable alternative of some smaller site allocations at Corsham to supplement the larger site allocations identified.

Consistency with National Policy

By failing to effectively meet the defined needs for housing even set as a minimum requirement in the Core Strategy, the plan is contrary to NPPF paragraph 47 that requires Local Authorities to significantly boost the supply of housing. In addition, the identified housing allocations are

now consistent with the NPPF's Core Planning Principles. Finally, an over reliance upon strategic sites threatens the Council's ability to demonstrate a deliverable five year supply of housing land.

Summary

The necessary solution to insert greater flexibility into the plan is to allocate additional housing allocations at Corsham. This will account for a quantified under delivery that exists in the plan as drafted. In the absence of such amendment, the plan fails to meet the NPPF tests of soundness for the various reasons set out above.

Conclusion

For the reasons set out above, the Housing Site Allocations Plan, as drafted, fails the NPPF tests of soundness for the following reasons:

Negatively Prepared – Does not plan for appropriate housing delivery having regard to needs within Wiltshire or adjoining Council areas. Further it fails to allocate a sufficient amount of housing land to meet pressing needs.

Unjustified – The proposed housing distribution strategy is overly reliant on large strategic sites and fails to make sufficient allocations at Corsham.

Ineffective – The plan fails to propose an appropriate housing distribution strategy or introduce sufficient flexibility into the developable supply over the plan period.

Inconsistent with the National Policy – The plan fails to allocate an appropriate amount of housing land or in the right location.

Summary

Our client's site offers a deliverable opportunity for a medium density housing scheme and should be allocated accordingly in the Housing Site Allocations Plan. We trust the above comments are of assistance in producing a final version of the plan and await confirmation of receipt of our representations in due course.

We welcome the opportunity to enter into dialogue with the Council in order to further proposals for the potential to deliver a sound plan.

Please do not hesitate to contact the writer should you wish to discuss any matter(s) arising.

Omission Site: Land to the North of Leafield Industrial Estate, Corsham

Land to the north of Leafield Industrial Estate is shown on the attached Location Plan (No. WBP1). The site extends to approximately 6ha, comprising a roughly rectangular shaped field on the southern side of Corsham, adjoining the town's defined settlement boundary. The site is considered to be appropriate for residential development and provides a viable and deliverable development opportunity adjoining Corsham within the coming five year period.

The site benefits from a location within cycling distance of the services and facilities in Corsham Town Centre, where there are also bus services to Chippenham and Bath. The site therefore in location terms (distance to services and facilities) affords a suitable opportunity for housing in accordance with national and regional planning guidance.

Local facilities are focused around the centre of Corsham on the High Street. Local employment opportunities exist at the Leafield Industrial and Fiveways Trading Estates. There are also four primary schools, one senior school, and a number of care homes located within the town.

The site slopes gradually down from south to north and comprises agricultural land fronting onto Upper Potley to the south. To the south of the site is Leafield Industrial Estate, whilst the site is bound by residential development on its eastern side. To the west lie agricultural fields. The main line railway in a deep wooded cutting forms the site's northern boundary. The site is naturally contained on all its sides such that it forms a natural rounding off to the settlement.

It is also noted that the now closed Corsham Railway Station lies within close proximity to the subject site and there is the potential that any major scheme could contribute towards the re-opening of the railway line, a community aspiration and a Core Strategy objective.

The conceptual masterplan CSA/1867/112 shows the site's potential to deliver approximately 140 no. dwellings, alongside sizeable areas of public open space and associated landscaping. The development of the site would strongly contribute to the overall betterment of the area whilst offering housing close to a large employment area.

The latest version of the Council's SHLAA identified our client's site as 'suitable' for housing development and 'deliverable' within the immediate 5 year period (SHLAA Site Reference: 3149 - Land to North of Leafield Industrial Estate). It is no doubt for this reason that the site was identified as one of 4 refined housing development options at the Informal consultation (July – September 2014) stage.

For the reasons set out above the site should be allocated within the emerging plan as a housing site allocation for approximately 140 no. dwellings.

Attached files (Please see Objective)	4739166 / 4739164
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To outline the fundamental failings of the plan having regard to the NPPF tests of soundness.

Comment ID:	3041	Consultee De Vernon Trustees De Vernon Trustees	Agent Mr Thomas Rumble Woolf Bond Planning	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 556491	Person ID: 901380	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.41			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Appendix A (Map A41: Corsham Settlement Boundary) [Officer note: It is assumed that this comment relates to Figure A.29 - Proposed amendments to the settlement boundary for Corsham.] Land to the south of Potley Lane, Corsham benefits from detailed planning permission for 64 dwellings (LPA Ref. 16/02523/REM). It is therefore unjustified and ineffective to remove this land from inside the settlement boundary and place it within the countryside. For this reason the settlement boundary should remain as per its current boundary and amended to also include our client's site at land to the north of Leaffield Industrial Estate, Corsham.</p> <p>Conclusion For the reasons set out above [and in comment ID 3040], the Housing Site Allocations Plan, as drafted, fails the NPPF tests of soundness for the following reasons: Negatively Prepared – Does not plan for appropriate housing delivery having regard to needs within Wiltshire or adjoining Council areas. Further it fails to allocate a sufficient amount of housing land to meet pressing needs. Unjustified – The proposed housing distribution strategy is overly reliant on large strategic sites and fails to make sufficient allocations at Corsham. Ineffective – The plan fails to propose an appropriate housing distribution strategy or introduce sufficient flexibility into the developable supply over the plan period. Inconsistent with the National Policy – The plan fails to allocate an appropriate amount of housing land or in the right location. The settlement boundary should remain as per its current boundary and amended to also include our client's site at land to the north of Leaffield Industrial Estate, Corsham. Our client's site offers a deliverable opportunity for a medium density housing scheme and should be allocated accordingly in the Housing Site Allocations Plan. We trust the above comments are of assistance in producing a final version of the plan and await confirmation of receipt of our representations in due course.</p>				
Attached files (Please see Objective)	4739164				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To outline the fundamental failings of the plan having regard to the NPPF tests of soundness.				

Comment ID:	3042	Consultee Mr Norman Swanney Person ID: 381339	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.5 Upper Studley			Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The public release of the June 2017 Habitats Regulations Assessment for Wiltshire Housing Site Allocations Plan Pre-submission Draft, places a significant emphasis on the danger to habitats. This is far more wide-reaching than hitherto and suggests further obstacles to the development of site 3565. The public release of this document comes literally at the conclusion of the consultation period and does not provide the opportunity for informed public scrutiny of this document and the inclusion of this information within public objections.</p> <p>This timing could be seen to be highly suspicious, especially in the light of the cancellation of the promised second public presentation in Trowbridge (committed to in June 2017 and cancelled at the end of August with little or no public information) and the refusal to even acknowledge requests to extend the consultation process to make allowances for officers' summer leave arrangements.</p> <p>The fact that this document has been referenced in Council documentation and has not been available for independent scrutiny and public access for the entire period of the consultation is a matter of grave concern and questionable procedure. Any public access has been based on the 2012 HRA and does not contain references to surveys made by Wiltshire Wildlife in 2015, 2016 and 2017 which are of direct relevance to the Site Allocation Proposal.</p> <p>If there is no reasonable explanation for the release of the HRA June 2017 document, at such a late date in the consultation process, the person who authorised this delay should be held publicly accountable.</p> <p>The public release of the 2017 HRA made yesterday clearly states that: Recommendations on page 76 specifically relate to Site 3565 and state. 'Recommendations (continued)</p> <p>Bath and Bradford on Avon Bats SAC Habitat Loss / Deterioration H2.5 – Upper Studley</p> <p>The site is in an area likely to be used by Bechstein's bats associated with the Bradford and Bath Bats SAC. Sensitive habitat features on / adjacent to the site include:</p> <p>Boundary hedgerows/ tree lines</p> <p>Lambrook Stream</p> <p>These features should be retained and / or buffered from development (including residential gardens) by wide (10-16m), dark (<1 lux) dark continuous corridors of native landscaping which will allow for their long-term protection and favourable management in order to secure continued or future use by Bechstein's bats.'</p> <p>This recommendation therefore makes access to the full site impossible and therefore the site MUST be removed from the Proposal.</p> <p>Directives in the 2017 HRA should be adhered to, and site 3565 should be removed from the proposal forthwith.</p>			
Attached files (Please see Objective)				
If your representation is seeking a change, do you consider it necessary to				

participate at the oral part of the examination?	
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Comment ID:	3043	Consultee Mr Alasdair Jones-Perrott Estate Manager Longford Estate Person ID: 900160	Agent Mrs Alison Whalley Associate Planner Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.7		Positively prepared Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Paragraph 47 of the NPPF requires that the full objectively assessed needs for market and affordable housing (OAN) is met within the Housing Market Area (HMA) as far as is consistent with the policies set out in the NPPF.</p> <p>The Wiltshire Core Strategy Inspector issued a letter on 2nd December 2013 (large parts of which are maintained in his Final Report) which identified that the OAN was in the region of 44,000 dwellings over the plan period. Nevertheless, the Inspector went on to accept a housing requirement of 42,000 dwellings.</p> <p>The High Court Judgment of Jelson Limited vs Hinckley and Bosworth Borough Council et al [2016] EWHC 2979 (Admin), defines what is meant by the terms OAN and housing requirement in paragraph 41, as follows:</p> <p>"Full Objective Assessment of Need for Housing: This is the objectively assessed need for housing in an area, leaving aside policy considerations. It is therefore closely linked to the relevant household projection; but it is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics...</p> <p>Housing Requirement: This is the figure which reflects, not only the assessed need for housing, but also any policy considerations that might require that figure to be manipulated to determine the actual housing target for an area. For example, built development in an area might be constrained by the extent of land which is the subject of policy protection, such as Green Belt or Areas of Outstanding Natural Beauty. Or it might be decided, as a matter of policy, to encourage or discourage particular migration reflected in demographic trends. Once these policy considerations have been applied to the figure for full objectively assessed need for housing in an area, the result is a "policy on" figure for housing requirement. Subject to it being determined by a proper process, the housing requirement figure will be the target against which housing supply will normally be measured."</p> <p>This identifies that a policy-on housing requirement can be different from the policy-off OAN to achieve particular policy objectives, such as protecting environmental assets or preventing unsustainable cross boundary relationships. However, in Wiltshire no such policy objective was fulfilled through the adoption of a housing requirement below the OAN. The reasons were in effect that:</p> <ul style="list-style-type: none"> the OAN could not be achieved; the Council could not demonstrate a five-year land supply against the OAN; the OAN was not assessed as being the preferred option through the Sustainability Appraisal; and the Council were committed to rapidly reviewing and responding to the OAN. <p>However, none of these reasons can now be justified (as described below) and so there can be no reason for not meeting the full OAN as required by paragraph 47 of the NPPF.</p> <p>The OAN could not be achieved</p> <p>Wiltshire delivered in excess of the annualised housing requirement in 2013/14 and in 2014/15, even in the absence of allocations prior to 2015. This clearly demonstrates that the adopted housing requirement can be sustainably exceeded. Indeed, now that the Strategic Allocations of the Core Strategy (and the Chippenham Site Allocations Plan and Neighbourhood Plans) are delivering it would be expected that these rates of</p>			

delivery would increase significantly. This entirely undermines the previous evidence presented to the Inspector examining the Wiltshire Core Strategy that such rates of development were unachievable.

The Council could not demonstrate a five-year land supply against the OAN

Based on the Council's figures and method of calculation, the Council would currently be able to identify a five-year land supply against a housing requirement of 46,158 dwellings (7,440 in East Wiltshire HMA; 27,898 in North and West Wiltshire HMA; 10,820 in South Wiltshire HMA) in addition to the allowance for 900 dwellings at the West of Swindon. The adopted housing requirement can therefore be increased to reflect (or even exceed) the OAN in accordance with the NPPF.

The OAN was not assessed as being the preferred option through the Sustainability Appraisal

The Sustainability Appraisal (SA) has evolved since the adoption of the Core Strategy, and this has been used to inform the Housing Site Allocations Plan which proposes to deliver circa 46,600 dwellings.

The Council were committed to rapidly reviewing and responding to the OAN

The Inspectors Final Report relied upon the Council producing a new SHMA by early 2016 (see paragraph 81). This would have enabled the Council to respond positively to address the identified needs through the planned early review of the Core Strategy. However, in the intervening 3 years, no such SHMA has been produced and there has been no progress on the early review of the Core Strategy. It is self-evidently the case, that the Council have not re-assessed needs and responded appropriately. The continued reliance upon the commitments of the Council to identify and address the OAN should not be afforded weight, given that the previous commitments have not been fulfilled.

Based on the preceding analysis, there is no evidence and no justification for not meeting the OAN in full in Wiltshire, as required by paragraph 47 of the NPPF. The Housing Site Allocations Plan should therefore seek to deliver the OAN of 44,000 dwellings. Such an approach would be wholly consistent with the housing requirement of the Core Strategy which requires the delivery of at least 42,000 dwellings.

The SHMA

Wiltshire Council and Swindon Borough Councils have jointly commissioned a SHMA. A draft of this document was presented at workshops in October 2016 although the document was not published. However, in the following year no further progress has been made towards the publication of this SHMA. This is highly unusual given that SHMAs typically take only a few months to produce and that the Wiltshire Core Strategy Inspector had relied upon the publication of this document in early 2016 to find the Wiltshire Core Strategy sound.

This SHMA should be published as soon as possible in order that participants can either be reassured that the Development Plan for Wiltshire is doing its job and meeting the OAN in full; or that appropriate action can be taken to identify additional sources of supply.

The Standardised Methodology

The Government are due to consult upon a standardised methodology for the OAN in September 2017. Whilst this will only be a consultation document and the weight to be afforded should be viewed in this context, it will provide an indication of the OAN for Wiltshire.

Once the SHMA and/or the standardised methodology is made available, it will be necessary for the OAN to be responded to within the Housing Site Allocations Plan in accordance with the findings of the Inspector Ware regarding the Harrogate District Sites and Policies DPD who identified that where the OAN had been reassessed it is necessary to take this into account in a Site Allocations Plan. The same finding has recently been reached by Inspector Lyons in relation to the Forest of Dean Site Allocations Plan.

Based on the preceding analysis, it is clear that in order to accord with national policy, it is necessary for the Housing Site Allocations Plan to deliver the full OAN for Wiltshire, taking account of the identified OAN (44,000 dwellings) and any newly arising evidence.

DISTRIBUTION OF GROWTH BETWEEN THE HMAs

Wiltshire contains 3 HMAs, each of which is planned to deliver at least 9% in excess of the Core Strategy minimum housing requirement (according to Table 4.7). Provision of a level of housing in excess of the minimum housing requirements, and cumulatively in excess of the currently identified OAN is to be supported providing this supports the spatial distribution identified in the Core Strategy.

DISTRIBUTION TO THE SUB AREAS

The Core Strategy contains approximate housing requirements for each sub-area (towns and CA remainders). These approximate requirements are essential to ensure the spatial distribution of the Core Strategy.

Whilst the sub-area housing requirements are approximate it is necessary for the Housing Site Allocations Plan to conform to these (approximately) to be in accordance with the spatial distribution of the Core Strategy. However, the planned supply identified in the Draft Plan (Tables 4.9 to 4.11) deviates significantly from the adopted spatial distribution in a large number of sub-areas, including a significant shortfall (of

more than 10%) in Marlborough CA remainder, Tidworth CA remainder, Chippenham CA remainder, Trowbridge Town, Warminster Town, Amesbury CA remainder, Mere CA remainder, Wilton CA remainder, Tisbury and Tisbury CA remainder. Additional allocations will be required in these sub areas to ensure consistency with the adopted spatial distribution.

Furthermore, the approximate requirements are consistent with the adopted housing requirement, which as addressed previously does not fulfil the objectives of national policy as this does not provide for the OAN. It is therefore appropriate to apply a 5% uplift to these approximate sub-area requirements to be consistent with the OAN (which is 5% greater than the housing requirement).

Once this necessary uplift is applied, there would be an even greater shortfall in the planned supply in these sub-areas (although not in any other sub-areas).

Additional allocations are required in these sub-areas to meet the OAN whilst maintaining the spatial distribution of the Core Strategy and to accord with the approximate requirements of the Core Strategy, even on the basis of the Council's own figures. The accuracy of these figures is addressed below.

DEVELOPABLE SUPPLY

The Council have identified the developable supply in the CA Topic Papers and in Table 4.9 of the draft Plan. However, the Council have not identified the individual components that make up this supply and as such the total figures in Table 4.9 cannot be relied upon. The necessary evidence should have been made available for this consultation, and will be required prior to examination. Pegasus Group reserve the right to submit detailed representations on this when the necessary evidence is made available.

The latest assessment of the developable supply which is available is contained in the Wiltshire Housing Land Supply Statement Update March 2017 (HLSS). It is useful to consider some of the components of supply identified in this report in order to assess the robustness of the Councils current unpublished assessment.

There are a number of sources of supply in the HLSS which should not be relied upon to deliver as outlined below.

Windfall allowance

The Draft Plan includes a windfall allowance based on the previous delivery of previously developed sites. This source of supply is in itself uncertain, but it is useful as an indication of what would be delivered if previous rates of delivery were able to be maintained.

There are however, two methodological flaws in the approach the Council take to calculating the windfall allowance.

Firstly, the Council propose to allocate at least one previously developed site (at Chapmanslade) which would otherwise have been classified as windfall development. The inclusion of this site as an allocation as well as maintaining the windfall rates results in double counting. This makes only a minor difference of 35 dwellings.

Secondly, the Council have changed their methodology for calculating the windfall allowance since the examination of the Wiltshire Core Strategy. At that time, the Council assumed that small sites would deliver circa 575 dwellings and that large sites would deliver circa 364 dwellings totalling 939 dwellings within five years. However, the Council now assume that there will be 1,611 windfall dwellings within five years.

This has been calculated using a consistent methodology for calculating the small site allowance (although based on a different period) from which it can be calculated that the Council now assume that circa 1,036 dwellings will be delivered on previously developed large windfall sites.

This is despite the fact that the Council do not have any evidence that there is sufficient capacity on such sites to deliver this level of housing. Indeed, at the time of the examination the Council identified a total potential capacity of only 364 dwellings (and some of these may have subsequently gained consent and so be included in the developable supply already).

The approach of the Council in regards to the large windfall allowance relies upon the delivery of a level of dwellings for which there is no evidence that there is the requisite capacity. Indeed, the Council rely upon the trends of large windfall development in recent years, but this is inevitably hugely variable and a single large windfall development can have a disproportionate effect on the average.

Saved Local Plan Allocations

The Council continue to rely upon the delivery of saved Local Plan allocations in the HLSS. This includes sites which were allocated in the North Wiltshire Local Plan in June 2006, the Salisbury District Local Plan in June 2003, and the West Wiltshire District Plan 1st Alteration in June 2004. Despite the fact that these sites have been allocated for development for between 11 and 13 years, there has been no progress towards site delivery.

The record of delivery of sites needs to be taken into account when assessing the availability of sites as set out in the NPPG (3-020). These saved allocations have an extensive record of non-implementation and against this background the certainty of any delivery from these sites is limited. Accordingly, in accordance with the NPPG these sites should not be relied upon to deliver.

Neighbourhood Plan Allocations

The HLSS also includes a number of Neighbourhood Plan allocations which are not subject to planning applications. The developability of sites is not required to be demonstrated in order for a Neighbourhood Plan to be made. Indeed, this is demonstrated by the fact that Wiltshire Council do not consider that the majority of sites allocated in the Devizes Neighbourhood Plan will deliver prior to 2024 in the HLSS.

The fact that the Council do not consider that these sites are deliverable for an extended period casts doubt on whether these sites will deliver at all. Even if they do deliver, it would only take a minimal delay for them to deliver outside of the plan period. As such, these sites should not be relied upon to deliver in the absence of detailed evidence.

Newly arising information

It is understood that new information in relation to the delivery of some sites has been made available to the Council, including through recent planning inquiries. By way of example, a new trajectory for Ashton Park was provided to the recent Lyneham inquiry since the publication of the Draft Plan. This identifies that this allocation will deliver 300 fewer homes during the plan period.

The Inspector in this case also considered that the trajectories for some other sites were overly optimistic and these should also be delayed, which is likely to further reduce the developable supply.

The effects of these necessary adjustments to the identified supply cannot be identified in full until the supporting evidence is made available. Nevertheless, based solely on this analysis, it is clear that the supply relied upon by the Council is overly optimistic. Indeed, it is estimated that the above would reduce the developable supply by circa 3,734 dwellings. With a detailed site specific analysis, it is likely that the supply would be even lower.

Table 4.7 of the Draft Plan identifies that with the proposed allocations and including an allowance for windfall, it is expected that 45,639 dwellings will be delivered across the plan period, although an additional 950 dwellings will be provided to the west of Swindon. However, with the removal of at least 3,734 dwellings this would amount to only 41,905 dwellings to meet the requirements of Wiltshire in addition to the 950 dwellings at the west of Swindon. This would marginally exceed the adopted housing requirement but would be over 1,000 short of meeting the OAN, even if every site delivered on schedule. The resultant shortfalls would exist in each HMA and would necessitate additional allocations in each

However, such allocations would be required to conform to the adopted spatial strategy and so should be located in the sub-areas which have significant shortfalls in the planned supply including Marlborough CA remainder and Trowbridge Town.

MONITORING

The Housing Site Allocations Plan is one of the delivery mechanisms for the Core Strategy. As such, the Council will be required to demonstrate that a five-year land supply exists at adoption. The Council have not yet produced the HLSS for 2017 which will be required to demonstrate this and so Pegasus Group reserve the right to submit comments on this matter when the relevant information is available.

The examination of the Housing Site Allocations Plan provides the opportunity to set the framework for monitoring housing delivery through the remainder of the plan period. Such an exercise will prevent this matter being continually debated through S78 appeals as has happened for many years.

The Buffer

Paragraph 47 of the NPPF requires that a 5% buffer is applied to the five-year housing requirement, but where there is a record of persistent under-delivery this should be increased to 20%.

The Council assess the record of delivery against the adopted housing requirement, which in itself does not represent the OAN. This means that even if the housing requirement was achieved there would still be a record of under-delivery against the housing needs. It is therefore necessary to treat the housing requirement as an absolute minimum.

Even against this housing requirement, East Wiltshire HMA has under-delivered in 60% of years; North and West Wiltshire HMA in 70% of years; and South Wiltshire HMA in 80% of years.

The Local Plans Expert Group report to Government proposed that where there was under-delivery in 65% of years this would equate to a record of persistent under-delivery. Similar approaches have been supported by Inspectors at S78 inquiries (for example ref: 3025120). This would

	<p>indicate that a 20% buffer is required in both North and West Wiltshire HMA and in South Wiltshire HMA. Indeed, in these HMAs, the record of delivery has resulted in a significant shortfall against the housing requirement across the plan period to date.</p> <p>The approach to dealing with undersupply</p> <p>Wiltshire Council adopt the Liverpool (or residual) approach to addressing undersupply which has arisen over the plan period to date. This approach has been adopted in Wiltshire since before the publication of the NPPG.</p> <p>The NPPG (3-035) identifies that:</p> <p>"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate."</p> <p>This is commonly referred to as the Sedgefield approach, and it is the preferred approach of the Government where there is undersupply (NB - where there is no such undersupply, there is no guidance of the appropriate approach). To adopt an alternative approach (including the Liverpool approach) it would be necessary to demonstrate that it was not possible to adopt the Sedgefield approach and that the Council was working jointly to address any five-year land supply shortfalls with neighbouring authorities.</p> <p>Indeed, this matter was discussed in detail during the appeal regarding Land off Park Road, Malmesbury (2200503) where the Inspector identified that it was necessary to adopt the Sedgefield approach to accord with the NPPG. This recommendation was supported by the Secretary of State.</p> <p>In the South Wiltshire HMA it would not be possible to demonstrate a five-year land supply using the Sedgefield approach. The Council should therefore have worked with neighbouring authorities to address the current shortfall, but they have not done so. In the absence of such joint working, it is necessary to adopt the Sedgefield approach and identify additional allocations to demonstrate a five-year land supply</p> <p>CONCLUSIONS</p> <p>The Draft Housing Site Allocations Plan will not provide for the OAN in any of the HMAs as required by national policy. Furthermore, the allocations proposed do not accord with the adopted spatial distribution of the Core Strategy.</p> <p>In order to address this, it will be necessary to identify additional allocations in those sub-areas which have a significant shortfall against the approximate sub-area housing requirements (which themselves do not meet the OAN).</p> <p>Furthermore, the Draft Housing Site Allocations Plan does not provide the requisite five-year land supply for South Wiltshire HMA in accordance with national guidance. It will therefore be necessary to identify additional allocations within this HMA.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Longford Estate welcome the opportunity to discuss with the Inspector the merits of Site 3435 coming forward as an omission site to address the shortfall resulting in the proposed amendments detailed above.</p>

Comment ID:	3044	Consultee Land Value Alliances Ltd Land Value Alliances Ltd	Agent Mr Jonathan Chick Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136406	Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Future Housing Requirements in Wiltshire</p> <p>LVA are concerned with the timing of the proposed submission consultation on the SADPD (which allocates sites until 2026) and the fact it takes no account of the potentially imminent review of the WCS (which will allocate sites until 2036) which will be informed by a new SHMA. Without the partial WCS review in place there is a risk that the SADPD (scheduled for adoption in winter 2018) along with any made Neighbourhood Plans in Wiltshire will become out of date very quickly. This is especially concerning considering the significant delays which have taken place with production of the SHMA (initially anticipated for early 2016).</p> <p>LVA consider that more sites should be allocated in the SADPD now (reserve sites at the very least) which will provide certainty and flexibility to Wiltshire and will avoid the risk of having to restart this process again when the SHMA is available and the partial review of the WCS takes place. Indeed the adopted WCS housing requirement was identified as a 'minimum' to ensure opportunities for residential development can come forward in a sustainable manner without comprising the Plan, which ensures a flexible approach can be followed.</p> <p>The need to provide greater flexibility and allocate more sites is supported by the governments approach endorsed in the recently published consultation 'Planning for the right homes in the right places: consultation proposals' (September 2017) on further measures set out in the housing white paper to boost housing supply in England. This proposes a standard method for calculating local authorities' housing need. The standard methodology approach suggests that LPAs may require a significant boost in housing in the future, this including Wiltshire which is one of the larger LPA areas</p> <p>in the country. It is important to note that the household projections figure simply shows the bare minimum that will be required in order to stand still and 'to boost significantly the supply of housing' for many LPAs including Wiltshire this number may raise significantly once further factors are taken into account.</p> <p>Based on the above LVA do not consider that the SADPD is sound as currently drafted as it is not the most appropriate strategy when considered against reasonable alternatives. For the Plan to be sound LVA would urge the Council to allocate more sites for residential development now to provide certainty and flexibility.</p> <p>Overall Housing Requirement in SADPD Core Policy 2 of the WCS sets out that sites for development will be identified through subsequent Site Allocations DPDs and by supporting communities to identify sites through neighbourhood planning. Therefore, the SADPD is the vehicle (along with neighbourhood plans) to allocate</p>				

	<p>sites to meet the 'minimum' WCS housing requirement of 42,000 between 2006 and 2026.</p> <p>Figure 5 of the draft SADPD suggests that 3,497 completions have taken place in the East HMA between 2006-2017 with 2,273 developable commitments available for the remainder of the plan period, leaving only a requirement of 170 dwellings. Importantly Figure 5 states this as 'minimum to be allocated' and is not a cap on further development which is consistent with Core Policy 2 of the adopted Core Strategy and reflects the aims of Paragraph 47 of the NPPF to 'boost significantly the supply of housing'.</p> <p>LVA welcome that the requirement for each HMA has been expressed as a minimum. It will be important that the draft SADPD fully embraces this to ensure that sufficient sites which are suitable for development in sustainable locations can come forward in addition to the allocations proposed. This will ensure a flexible approach to housing in Wiltshire and it is especially important to allocate enough sites now to reflect future requirements which may be required once further evidence is published relating to the OAHN.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>A number of issues are raised in the representation letter regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.</p>

Comment ID:	3045	Consultee Land Value Alliances Ltd Land Value Alliances Ltd	Agent Mr Jonathan Chick Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136406	Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Neighbourhood Plans It is acknowledged that neighbourhood plans have an important role to play in delivering housing requirements in Wiltshire in the plan period. At paragraph 2.22 of the draft SADPD it states: “The work being done on Neighbourhood Plans influences the selection of sites and where Neighbourhood Plans have been ‘made’ or are well advanced the Plan leaves decisions on the scale and locations for growth in settlements to the communities concerned.” Furthermore, paragraph 4.5 of the draft SADPD states; “No allocations are made at Large Villages in the East Wiltshire HMA because there is no strategic priority to do so due to the level of completions and supply committed within the HMA. Housing to meet local needs can be identified where necessary through neighbourhood planning.” Whilst LVA generally support this approach, they raise concerns with Neighbourhood Plans which have not yet been made and are still at an early stage and which are proposed to deliver housing to meet local needs in the future, especially for the large villages. Whilst sites are often identified in neighbourhood plans to deliver sustainable development it will be important to ensure that neighbourhood plans are not used as a mechanism to restrict development (to avoid an antidevelopment stance) which in turn could have an impact on the delivery of important sites in Wiltshire. In addition, the uncertainty regarding timescales of the production of neighbourhood plans is another potential issue. This was a particular concern to the Inspector who examined the WCS albeit was seen in the context of the early review of settlement boundaries to ensure they are up to date. In the Inspectors Report for the WCS (December 2014) when considering the settlement strategy proposed in the WCS he noted at paragraph 36: “To review boundaries, the CS identifies community led planning as the vehicle to deliver the necessary updates. However, there remains a considerable risk that, for example, Neighbourhood Plans will not be delivered across the country in a comprehensive or timely fashion. Such an outcome would, in the context of the CS Settlement and Delivery Strategy, potentially preclude development initiatives on the basis of an unjustified evidence base and therefore no represent a positive form of planning.” This exemplifies the importance of bringing forward more sites which are suitable and available for development now through the SADPD process due to the potential risk posed by significant delays in neighbourhood plans.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A number of issues are raised in the representation letter regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.				

Comment ID:	3046	Consultee Land Value Alliances Ltd Land Value Alliances Ltd	Agent Mr Jonathan Chick Planner	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1136406	Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Deliverability of Sites</p> <p>A Housing Trajectory is not included in the Plan or as an evidence base document. LVA consider it is very important for an up to date trajectory to be included in the Plan so that it is clear how many dwellings each site is expected to yield and at what point in the Plan period. We note that the latest trajectory available for public viewing is from the Wiltshire Housing Land Supply Statement dated November 2016. The Council have referred us to the 2016 Housing Land Availability Report showing the most up to date housing delivery figures (with a base date of April 2016), however no detailed housing trajectory is provided in this document.</p> <p>In terms of the East HMA, the 2016 trajectory predicts that 80 dwellings will delivered in the 2019/2020 period for the Horton Road site. For the Riverbourne Fields site the trajectory predicts delivery of 83 in the 2019/2020 period and a substantial 156 dwellings in the 2018/2019 period. In later years for this site (2020/21 and 2021/22) the trajectory predicts that the site will only deliver 18 dwellings in each year. LVA consider that these figures are too high and would urge the Council to provide evidence justifying these significant rates as it is not clear this has been provided. As set out above the Council will firstly need to prepare a new trajectory for the 2017/2018 base year.</p> <p>LVA also raise concerns with sites which are expected to deliver housing in the period 2017/2018 (i.e by end of March 2018) with some sites not delivering as quickly as expected and some which have not yet even started construction. The trajectory suggests that a large proportion of the five year land supply of sites will come from large allocations and it is unclear whether all of these will come forward as expected. One of the largest allocations which is expected to deliver a significant quantum of housing in the next five years is 'Land West of Salisbury Road in Marlborough' (site E15.2026).</p> <p>In this trajectory Wiltshire Council have indicated that 175 dwellings will be delivered on this site by 2021/22. An outline application for 175 dwellings was approved on July 2016 (LPA Ref:15/02026/OUT). The trajectory suggests 55 dwellings will be delivered on this site in 2017/2018 (i.e.by end of March 2018). A reserved matters application for 168 dwellings on the same land was live at the time of writing, however there is still likely to be a need to discharge relevant planning conditions, therefore it is unlikely whether the site will come forward as quickly as suggested. Based on a site visit to date we can confirm construction is yet to begin on this site with no obvious signs this will begin in the near future therefore LVA question whether 55 dwellings will be delivered by April 2018.</p> <p>Based on the above, the SADPD provides an opportunity for the Council to allocate additional sites to provide flexibility in their housing supply and reflecting the status of sites which are not delivering as expected.</p>				

Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A number of issues are raised in the representation letter regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.

Comment ID:	3047	Consultee Land Value Alliances Ltd Land Value Alliances Ltd Person ID: 1136406	Agent Mr Jonathan Chick Planner Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Allocations in East HMA</p> <p>Figure 5 of the draft SADPD suggests that 3,497 completions have taken place in the East HMA between 2006-2017 with 2,273 developable commitments available, leaving only a requirement of 170 dwellings to be delivered in the remainder of the plan period. Policy H1 of the draft SADPD proposes land allocated for residential development on a number of sites in the East HMA including in Market Lavington which are discussed below.</p> <p>Three allocated Market Lavington Sites (H1.2 – H1.4)</p> <p>Paragraph 5.23 of the draft SADPD notes that Market Lavington is an area affected by flooding, it states:</p> <p>“Surface water management and flood risk: parts of Market Lavington are affected by surface water flooding during extreme weather events. In part this is due to the village’s proximity to the chalk escarpment associated with the Salisbury Plain”</p> <p>Furthermore, all three sites are shown in the Sustainability Appraisal (SA) to have a moderate adverse effect on the objective to use and manage water resources in a sustainable manner (objective 3) and to minimise impacts on climate change through reducing vulnerability to future climate change effects.</p> <p>LVA raise concerns regarding the allocation of sites located in areas at risk to flooding which should be discounted unless it can be demonstrated that there are no other reasonable options available.</p> <p>LVA consider that locating further growth in sustainable locations in large villages such as Worton should be considered as a reasonable alternative to sites located in floodplains. This is particularly the case for Land at Sandleaze Farm which is not constrained by the floodplain and has no insurmountable constraints which would prevent development coming forward.</p> <p>In addition we are not aware of any technical assessments which have been prepared to demonstrate the acceptability of residential development on the sites proposed as allocations in Market Lavington. In particular we note the Underhill Nursery site (H1.2) allocated for approximately 50 dwellings does not appear to be have been assessed in relation to access. Indeed the SA states (SA objective 10):</p> <p>“It should be noted that access to this site is constrained and this would need to be investigated further if this site progresses to any further stage</p>				

	<p>in the site selection process.”</p> <p>LVA question whether a suitable access can be achieved at this site without having to use land outside of the red line. This is an issue which could prevent development coming forward. On this basis further sites which are suitable for development and deliverable in the plan period should be allocated in the SADPD.</p> <p>Based on the above LVA consider the Plan is not sound as it has not considered all reasonable alternatives and has based its strategy on allocating sites with doubts regarding their suitability without consideration of other sites which are less constrained and located in more sustainable locations.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>A number of issues are raised in the representation letter regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.</p>

Comment ID:	3048	Consultee Land Value Alliances Ltd Land Value Alliances Ltd	Agent Mr Jonathan Chick Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136406	Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The potential for development of land at Sandlease Farm, Worton</p> <p>As set out in the previous sections LVA consider that further sites should be allocated in the SADPD for the following reasons:</p> <ul style="list-style-type: none"> • The status of the new SHMA and partial WCS review which could have implications on the OAHN in Wiltshire; • The flexible approach endorsed in the adopted WCS which suggests the overall housing requirement is a 'minimum' with 'indicative' requirements for each Community Area; • The uncertainty regarding timescales for the production of neighbourhood plans; • The doubts about the delivery of some sites in the East HMA and their build out rates; • Concerns regarding the suitability of sites proposed as allocations in Market Lavington. <p>Based on these points LVA consider that the plan is not justified and not consistent with national policy, therefore is not sound. At a very minimum reserve sites should be allocated now in the event that the OAHN significantly increases when the SHMA is published/partial review of WCS takes place, but it would be prudent to allocate sites for development now which are available and can be delivered quickly to ensure the Council does not encounter problems in the future.</p> <p>In particular we draw the Council's attention to Land at Sandlease Farm in Worton which is a sustainable site capable of delivering housing development. The application area comprises approximately 2.1 hectares of undeveloped land to the east of Worton. The site is outside but immediately adjacent to the limits of development of Worton and next to existing residential development on two sides to the north and west, as shown on the attached site location plan (Appendix 1).</p> <p>Worton comprises a relatively large linear settlement which is served by a number of key facilities including a primary school, park, playing field, church, public transport service and public house. Notably a small part of the LVA site forms part of a much larger site which has been registered as a SHLAA site on a map of Worton (ref: 1068) and this was considered in an informal consultation on the SADPD in February 2015.</p> <p>LVA have promoted the site through the Worton Neighbourhood Plan process and have attended a number of meetings with the Steering Group.</p>				

The site is being considered as an option for growth as part of this process.

The site was subject to an outline planning application in February 2017 for up to 26 dwellings (reduced from 29) which helps to confirm the sites overall suitability for development (LPA Ref:17/01905/OUT). The land still represents an opportunity for development and could make an important contribution to meeting future market and affordable housing needs. It should be noted that the land is in control of Worton LVA LLP and is available for development now. For reference an illustrative masterplan is submitted in support of these representations to demonstrate how development on the site can be accommodated (Appendix 2). This masterplan has been prepared following a detailed assessment of likely constraints and opportunities, and includes a large open space buffer to the south of the site which retains the existing village edge.

The proposals were shaped by pre-application discussions with Wiltshire Council and on-going engagement with key stakeholders, including the Parish Council, Neighbourhood Plan Group and the local community. LVA consider development on this site can provide the housing needed in Worton and provide the following benefits for the local community;

- Create a thriving community by providing a range of new homes at the logical site in Worton.
- New homes for first time buyers, families and existing residents who wish to down size.
- Provide affordable housing for local people who are unable to buy on the open market.
- Support sustainable growth of Worton in order to retain and develop local services.
- Fund local infrastructure projects and contribute to local education facilities (including the school which has a shortage of pupils according to the latest village survey).
- Enhance the existing Public Rights of Way.
- Enhance the village connections with the existing Sandlease play area.
- Create a new area of public open space and recreation for the whole community to enjoy.
- Round off and protect the southern edge of Worton whilst retaining and improving the existing pedestrian and cycle links to Sandlease Playing Field to the west of the site.

Prior to submission of the planning application local residents were made aware of the proposals via a leaflet dropout, the process is set out in the submitted statement of community involvement. The planning application was also supported by a suite of baseline assessments including the following:

- Flood Risk Assessment (including Drainage Strategy) (Appendix 3)
- Ecological Assessment (Appendix 4)
- Transport Assessment (including Proposed access details) (Appendix 5)
- Landscape and Visual Impact Assessment (Appendix 6)

	<ul style="list-style-type: none"> • Geophysical Survey (Appendix 7) • Contaminated Land Desk Study (Appendix 8) <p>The above baseline assessments have not identified any insurmountable constraints which would prevent development from coming forward. These documents were also subject to consultation with consultees during the planning application process. Notably the proposals received no technical objection from the Wiltshire Transportation Officer who has confirmed that the proposed access from High Street is acceptable. In addition the proposals have received support from the Parish Council subject to achieving a safe access to the site.</p> <p>Significantly the only outstanding technical matters related to local landscape impact and the need for further archaeological investigation (which Wiltshire would not condition). Our client has instructed the further archaeological work in the form of trial trenching which we anticipate will be completed shortly.</p> <p>Summary</p> <p>Overall LVA raise broader concerns with the draft SADPD and consider that further sites in sustainable locations should be allocated now to ensure a flexible approach. This is particularly the case for sites such as Land at Sandlease Farm in Worton which is in a sustainable location, has no insurmountable constraints and is available to deliver housing now.</p> <p>We wish to take part in the forthcoming examination and reserve the right to comment further if the issues raised aren't addressed satisfactorily in future versions of the SADPD.</p>
Attached files (Please see Objective)	4739513 / 4739515 / 4739518 / 4739519 / 4739520 / 4739516 / 4739514 / 4739517
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	A number of issues are raised in the representation letter regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.

Comment ID:	3049	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Longford Estate	Pegasus Planning	Do you consider the draft WHSAP is sound?	No
Person ID: 900160			Person ID: 900154		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Salisbury - Netherhampton Road				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocations Plan Pre-Submission (Regulation 19) draft plan (WHSAP) was published for public consultation on Friday 14th July 2017, the consultation runs until Friday 22nd September 2017.</p> <p>These representations are submitted on behalf of Longford Estate and relate to the allocation of sites and the resultant housing land supply in the Southern Wiltshire Housing Market Area.</p> <p>The WHSAP is a daughter development plan document to the adopted Wiltshire Core Strategy (2015) (WCS). The WCS set out minimum housing requirements for each of the three Housing Market Areas in the County.</p> <p>Policy H3.1 of the WHSAP states the following: "Approximately 63ha of land at Netherhampton Road, as identified on the policies map, is proposed for mixed-use development comprising the following elements: Approximately 640 dwellings Land for employment (81, 82 and 88 uses of the Use Classes Order At least 1.8ha of land for a two form entry primary school along with playing pitches A local centre A Country Park of at least 10ha in size with associated parking and facilities. Development will be subject to the following requirements: Strategic landscaping and open space provision . All built development to be located below the 75m contour and a Country Park to be located in the east and south of the site. Transport network improvements necessary to accommodate the scale of development envisaged Provision of sufficient school and healthcare capacity to meet the need created by the development Measures to safeguard the interest of Harnham Hill Chalk Pit SSS/ and Harnham Slope County Wildlife Site. Surface water management that achieves equivalent or less than current greenfield rates of run off. Development will take place in accordance with a masterplan for the site approved by the Council." The WHSAP proposes to allocate 750 houses in the Salisbury Community Area. Site S1028 would accommodate the vast majority (640) with 100 houses proposed on the site opposite (Site S1027(It is noted that Wiltshire Council do not expect Site S 1027 to come forward within the plan period.)), 100 houses to extend the existing Rowbarrow housing development (Site 3272), and 10 houses at Hilltop Way (Site S61). The Plan therefore proposes to allocate 85% of the potential future housing in Salisbury in one location at Netherhampton Road. Longford Estate have several major concerns in this regard: Highways Impact The Netherhampton Road sites are located in an area already noted in Wiltshire Council's Transport Model Forecasting report as having two key access junctions which are highway hotspots. These are: Harnham Gyratory and Park Wall Junction. Any development at Netherhampton Road</p>				

	<p>would severely impact on these two junctions which are already over capacity in peak periods. See the representations made in relation to Paragraph 5.128.</p> <p>The Summary of the Salisbury Transport Strategy is included at Appendix 3. Paragraph 5.6 states that: "Junction improvements tend to result in more traffic passing through a particular junction and thus consume any of the additionally created capacity. This is particularly so in Salisbury, where the Netherhampton Road provides an alternative route for traffic passing through Salisbury and improvement to traffic flow through the Harnham Gyratory would result in more traffic travelling along Netherhampton Road rather than along the A36."</p> <p>This implies that Netherhampton Road could (in 2012) accommodate increased levels of traffic from the Harnham Gyratory travelling away from Salisbury City Centre. The proposal of 740 homes on Netherhampton Road will not only have a major adverse impact on these junctions, it would also have content with the additional traffic proposed above if the Council's plans come to fruition. It is proposed that the Council's Transport Strategy is flawed and before any strategic allocations can be made, the traffic modelling and proposed network improvements MUST be robust and based on housing trajectories looking forward to 2036 in line with the timescales of the Council's intended Local Plan Review. A planning application was submitted by Wiltshire County Council in 2002 (ref. S/2002/1961) for the construction of a viaduct over the River Nadder and the construction of a single carriageway relief road for Harnham including associated infrastructure and works on land which forms part of the Site S1028.</p> <p>It is submitted that the development of Sites S1027 and S1028 would not only substantially increase traffic movements along Netherhampton Road and have major adverse impacts on the already burdened highway, it would also remove the opportunity to provide a clear and practical highways solution for the city. As it stands, there are no proposals to improve the current highways problems, despite having been on the Council's agenda for many years.</p> <p>Longford Estate believe that prior to any allocation, it is fundamental that a highways solution be proposed in order to be confident in the delivery of the homes. Site 3435 was technically assessed as part of the lead up to the WHSAP and concluded that the main road (Newbridge Road) could accommodate the level of car movements, and in all other elements (please see Appendix 1). No such studies have been undertaken for Sites S1027 and S1028, and therefore it is an extremely risky approach for these sites to be allocated in the absence of critical technical information and proposed solutions.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>We request that Site 3435 be considered as an omission site at the Examination. We request the opportunity to explain the background to the site's promotion and its development potential and how its inclusion as an allocation would ensure the WHSAP is "effective" and therefore sound.</p>

Comment ID:	3050	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Longford Estate Person ID: 900160	Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Landscape</p> <p>The evidence base supporting the WHSAP includes a Landscape Assessment which assesses all of the proposed site allocations. The assessment of Site Ref. S1028 is set out at pages 13-16 of the Landscape Assessment Part 2. It judges the site to be:</p> <ul style="list-style-type: none"> - Attractive and peaceful with high visual prominence; - High sensitivity for public accessibility; - Contains highly important views; - Low mitigation potential; - HIGH ADVERSE effect on landscape character; - HIGH ADVERSE impact on views (including view from public rights of way); - Medium adverse effects on neighbouring residential properties, and - Low capacity to accommodate change. <p>The assessment goes on to state that development of the site would adversely affect views and it would be difficult to mitigate against this; and that development of the site would conflict with the recommendations made for the site and the wider area, as set out in the "Salisbury District Settlement Setting Assessment" (2008).</p> <p>The findings of the Landscape Assessment as documented were not included in the summary assessment of the Sustainability Appraisal of Site S1028 which is set out at Table F.9 within the Salisbury Community Topic Paper. Misleadingly, the second paragraph specifically states that "No major adverse effects have been identified for this site". It is submitted that due consideration has not been given to the potential landscape harm that would arise through the site's development and its encroachment towards the Cranborne Chase AONB boundary, thereby potentially affecting its setting.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We request that Site 3435 be considered as an omission site at the Examination. We request the opportunity to explain the background to the site's promotion and its development potential and how its inclusion as an allocation would ensure the WHSAP is "effective" and therefore sound.				

Comment ID:	3051	Consultee Mr Alasdair Jones-Perrott Estate Manager	Agent Mrs Alison Whalley Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Longford Estate Person ID: 900160	Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1 Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Water Supply There is no local water supply capacity available for the development of 640 homes at Site S1208 and this has been confirmed by a local water utility company (ref. Table G.5 of the Salisbury Community Area Topic Paper). A capacity appraisal would be needed to confirm the scope, and works would be necessary to upgrade the local supply and capacity. In the absence of knowledge of the scale of the works, it is submitted that such works may render the scheme unviable, particularly when combined with highways infrastructure upgrades (yet to be identified).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>We request that Site 3435 be considered as an omission site at the Examination. We request the opportunity to explain the background to the site's promotion and its development potential and how its inclusion as an allocation would ensure the WHSAP is "effective" and therefore sound.</p>				

Comment ID:	3052	Consultee Mr Alasdair Jones-Perrott Estate Manager Longford Estate Person ID: 900160	Agent Mrs Alison Whalley Associate Planner Pegasus Planning Person ID: 900154	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury - Netherhampton Road		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Deliverability</p> <p>Longford Estate is concerned that the deliverability of Site S 1208 is extremely questionable. There is no evidence to indicate that development could come forward within the Plan Period. Longford Estate consider that the approach taken in the WHSAP to allocate 87% of the Salisbury housing allocations in one location, with many unknown and unresolved issues, risks a huge housing shortage in Salisbury in the future. Particularly when considered in tandem with the allocations of housing at Churchfields (1100 houses) and the Central Car Park (200 houses) which have been confirmed in the WHSAP as unlikely to come forward within the Plan period. Paragraph 4.66 of the WHSAP states that:</p> <p>By limiting the potential housing supply to one large site in Salisbury, the plan conflicts with paragraph 14 of the NPPF which states that: "Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change"</p> <p>Should Sites S1028 and S1027 be rendered undevelopable, the Plan would not allow for sufficient flexibility for an alternative, deliverable site to come forward in accordance with policy.</p> <p>In terms of lead times a report into the delivery of urban extensions on behalf of Gladman developments limited was prepared in February 2014 and was submitted as evidence to the Stroud Examination. The Gladman study was supported by evidence provided by local authorities on 78 sites. The Study considered the factors associated with bringing forward major urban extensions of 500+ dwellings before moving on to look at specific case studies from each of the English regions, Scotland and Wales. The Study was an exercise in considering deliverability, the factors which affect deliverability, the timescales involved from a site being identified for development to planning permission being granted and thereafter the rates at which housing can realistically be delivered on major urban extension sites of 500+ dwellings.</p> <p>The results of the site specific research, was then drawn together to inform an overall assessment of the timescales associated with bringing forward urban extensions and rates of delivery once development gets underway. The Study was made available to LPAs, government departments and agencies and industry bodies as an evidence based tool which can be drawn upon to inform Development Plans across the UK.</p> <p>The Study found that the time taken to determine planning applications is a major factor in the overall delivery timescales for Major Residential Development sites. The average time period from the initial concept to the grant of planning permission for sites in England is 6.67 years. The average timescale from submission to a grant of outline planning permission was 34 months (time periods for determination as provided by the relevant Authority).</p> <p>The average across those sites in the Study which have extant permission in outline and where the timescales between the Council resolving to grant permission and the decision being issued are available (where the time period for legal agreements to be made has been provided by the Authority) was 23.6 months. It should be noted many sites failed to progress beyond a resolution to grant because of unresolved legal matters.</p>			

In terms of delivery from subsequent discussions with the relevant developers the Study found (including Taylor Wimpey, Barratt, David Wilson Homes, Bellway and Redraw), the average annual delivery rate of 30 - 35 dwellings per annum per single house builder outlet is realistically achievable .

The Study concluded that an 8-year period should be allowed for from the preparation of an outline/ principle planning application to the delivery of homes. It is important to note that the Study was rooted in factual evidence provided by Local Authorities across England and Scotland. The Savills Study on behalf of Barratt Homes in October 2014 provided an update on the Gladman Study (also submitted to the Stroud Local Plan Examination). It identified 24 sites for which an outline application was submitted after 2010, 18 of which were identified in the original Gladman report. Compared with the overall sample, these sites progressed much more quickly, taking an average of 33 months from the submission of the outline application to start on site, against the average of the whole sample of 60 months. "This suggests that it has become more likely that large sites will progress through the planning system quickly enough to begin delivering housing units within the lifetime of a five-year housing land supply plan." Even so, 33 months from submission of outline planning application to a start on site would still point to an overall period approaching 4 years for the first occupation once the initial infrastructure phase has been allowed for together with the construction period for the first houses.

If this were applied to the Netherhampton site, it would take 6.7 years to progress to outline application stage, and a further 33 months so first commencement. This would take the timeframe to 2026 at the very earliest.

Therefore, even in the event where Site S1028 is considered to be developable, it is highly unlikely to commence within the plan period. It is submitted that the inclusion of Site S 1028 is not "effective" as it is not deliverable within the plan period.

Local Plan Review

The Wiltshire Core Strategy (WCS) 2015 plans for housing to come forward through its strategic allocations, neighbourhood plans and planning applications as well as subsequent site allocations development plan documents. The need to bring forward a Housing Site Allocations Plan to compliment the WCS was identified to provide a surety of housing supply through the remaining plan period to 2026.

At the same time the Council has embarked upon the Wiltshire Plan Review for the period 2016 - 2036 with a regulation 18 consultation on Options in 2018.

Notwithstanding the concerns over the sustainability of the proposed H3.1 allocation, there is a clear doubt over its ability to deliver housing over the plan period. Paragraph 4.68 recognises the need for a "generous lead in time" for delivery of Netherhampton Road, recognising the scale of the site and need to develop a mitigation strategy and master plan. The site is also identified as having potential to provide employment land for relocation of businesses from Churchfields Business Park, thus freeing up land for delivery of housing at that location in the "longer term". There is no indication of the extent of employment land to be provided under H3.1.

It should be noted that this is a "Housing Sites Allocations Plan" intended to compliment the WCS and provide surety in housing land supply during the plan period up to 2026. Employment sites are allocated with land requirements specified through the WCS, mainly as part of strategic mixed use developments. The need for further employment sites will form part of the Local Plan review.

Policy H3.1 is the only mixed use allocation within the HSAP and of a significantly larger scale than the other allocations. In all the circumstances, it is evident that the land at Netherhampton Road should be given more time to assess constraints and develop a mixed use development strategy. The scale of development should be more appropriately considered through the Local Plan review 2016-2036.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

We request that Site 3435 be considered as an omission site at the Examination. We request the opportunity to explain the background to the site's promotion and its development potential and how its inclusion as an allocation would ensure the WHSAP is "effective" and therefore sound.

Comment ID:	3053	Consultee Wainhomes (South West) Holdings Ltd	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 389564	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.48 Trowbridge SBR		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We note that the methodology now excludes sites allocated in the Development Plan. We consider that this is not appropriate for the reasons given in paragraph 7.15 and 7.16. By way of example, our client's site at Drynham Lane, Trowbridge is allocated in the Core Strategy as part of a wider Ashton Park Urban extension. However the revised settlement boundary for Trowbridge excludes the whole of the Ashton Park Urban extension. This applies to all settlements which have allocations in the Core Strategy. However these are sites which the Council is reliant on to deliver the much needed new homes in Wiltshire and as the revised settlement boundaries will form the development plan then they should reflect the adopted policies and allocations in both the Core Strategy and this Allocations DPD. It will also give certainty to anyone reading the development plan on the precise status of these allocated sites.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Wainhomes is a key developer in Wiltshire with sites west of Swindon, Trowbridge and Royal Wootton Bassett. Our client has additional sites which we consider should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.				

Comment ID:	3054	Consultee Wainhomes (South West) Holdings Ltd	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 389564	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A.44 Royal Wootton Bassett Settlement Boundary	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We object to the settlement boundary as currently drafted. The reason for this is that the methodology sets out a number of criteria for how the settlement boundaries have been defined. One of the criteria is: “built and commenced residential and communities facilities development such as religious buildings, schools and community halls that is physically related to the settlements”.</p> <p>Our client has had a number of planning permissions at Royal Wootton Bassett over the last number of years and these developments have necessitated changes to the settlement boundary for Royal Wootton Bassett as set out in the plan in Appendix A. This correctly shows some of these permissions being included within the settlement boundary. However the revised settlement boundary has not taken into account the extant consent to the south of the Interface Business Park. That application (14/03343/FUL) was for 68 dwellings and outline consent for a 39 bed care home and 22 age restricted dwellings and Country Park. There has been subsequent consent on the care homes scheme for additional dwellings. Enclosed at Appendix EP1 is the location plan for the permission which we can confirm has been commenced and under construction. Therefore the settlement boundary for Royal Wootton Bassett should be amended to reflect these consents.</p> <p>We consider that the settlement boundary should be revised to take account of the whole site including the open space/country park as this would accord with Criterion 4 in Table 8.1 which proposed to include within the settlement boundary: “recreational or amenity space at the age of settlement that relates more closely to the built environment.”</p> <p>It is apparent from the extant consents on the site and how the country park relates to the settlement that the settlement boundary should be drawn along the railway line which forms the southern boundary of our client’s landholding.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Wainhomes is a key developer in Wiltshire with sites west of Swindon, Trowbridge and Royal Wootton Bassett. Our client has additional sites which we consider should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.				

Comment ID:	3055	Consultee Wainhomes (South West) Holdings Ltd	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 389564	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Omission Site - Lower Woodshaw, Royal Wootton Bassett	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As set out in the introduction to this statement, we seek the allocation of our client's site at Lower Woodshaw Farm for development. The site would provide the opportunity to deliver a sustainable development in accordance with the Framework for the following reasons. Paragraph 7 of the Framework states that there are three dimensions to sustainable development: economic, social and environmental. The social role means: "supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well being."</p> <p>The proposed development would meet this role by delivering around 260 open market and affordable homes to meet housing needs in Royal Wootton Bassett and Wiltshire. It would also assist in delivering a five year supply of housing land and flexibility to meet the overall requirement in the plan period.</p> <p>The Royal Wootton Bassett Neighbourhood Plan (RWBNP) does not recognise that there is a need to provide additional housing land now to meet Wiltshire's five year housing land supply requirement. As set out above, Wiltshire Council's 5 year supply is precarious and therefore additional sites are needed in the short term to meet the deficit, and this is likely to necessitate additional sites coming forward in the Market Towns.</p> <p>A further practical effect of the housing land supply position is that all policies relevant to the supply of housing will be automatically out of date, by the operation of Framework paragraphs 47 and 49. This also necessitates further sites to be brought forward. Being located adjacent to the settlement boundary of Royal Wootton Bassett, our client's site is well located in terms of accessibility. In particular, it is in close proximity to the Interface Business Park, which provides a range of employment opportunities. There is also a pub (Woodshaw Arms) and a supermarket (Tesco Express) in close proximity to the site. Open space (including a Local Equipped Area of Play) would be provided on site. Should a railway station be developed at the Interface Business Park, which is one of the potential locations put forward in policy 14 of the RWBNP, the site would be within close proximity to this. Indeed as stated above, an allocation at our client's site could assist facilitating the railway station in this location.</p> <p>Paragraph 7 of the Framework explains that the economic role means: "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and co-ordinating development requirements, including the provision of infrastructure"</p> <p>During the build programme, construction related jobs and indirect jobs would be created. This would benefit local contractors and suppliers. Once occupied, the proposed development would help contribute to ensuring the Borough has a stable workforce in terms of ability and age. The residents of the scheme would spend money in Royal Wootton Bassett and other towns in Wiltshire. The proposed development</p>				

	<p>would therefore generate significant spending in the Borough, which would help create full time jobs in the local retail and leisure sectors. In addition, the proposed development would deliver a New Homes Bonus and Council Tax income for the Council.</p> <p>Paragraph 7 of the Framework states that the environmental role means: “contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimize waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”</p> <p>The allocation of our client’s site would result in the loss of open countryside. However the Council is relying on large sites in the open countryside to meet its housing requirement to 2026 across the Borough.</p> <p>In terms of flood risk, the site is located within an area identified in the Core Strategy (policy CP67) as being at risk of flood. However, an indicative layout for the site has been drafted, which includes a flood storage area to the south west of the site. Flood risk issues can therefore be mitigated.</p> <p>Access would be taken from the access road to the Interface Business Park to the west of the site. Two access points are proposed on the indicative layout plan. A Transport Assessment would be prepared to assess the impact the proposal would have on the highway network.</p> <p>In terms of trees and hedges, these would be retained wherever possible, Most of the existing trees and hedges are located on the boundaries of the site, but there is a line of trees and hedges, which bisects the site in two. This would be retained in the proposed layout of the scheme.</p> <p>In terms of other environmental considerations, including: agricultural land, landscape and visual impact and ecology, these would be addressed through the design and detailed reports would be provided in support of a planning application.</p> <p>In summary, the loss of open countryside and agricultural land does not significantly or demonstrably outweigh the significant benefits the proposed development would deliver. Therefore, the presumption in favour of sustainable development applies and we seek the allocation of the site in the RWBNP.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>Wainhomes is a key developer in Wiltshire with sites west of Swindon, Trowbridge and Royal Wootton Bassett. Our client has additional sites which we consider should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.</p>

Comment ID:	3056	Consultee Wainhomes (South West) Holdings Ltd	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 389564	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Omission Site - Widham Farm, Purton	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is a neighbourhood plan progressing for Purton and we made representations to the Regulation 14 consultation. Those representations are attached and we do not repeat them here as they demonstrate the need for additional sites in Purton and the suitability of Widham Farm.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Wainhomes is a key developer in Wiltshire with sites west of Swindon, Trowbridge and Royal Wootton Bassett. Our client has additional sites which we consider should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.				

Comment ID:	3057	Consultee Wainhomes (South West) Holdings Ltd Person ID: 389564	Agent Mr Stephen Harris Director Emery Planning Person ID: 389561	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - land at Bratton Road, Westbury		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We also seek the allocation of Mr Nevill's site at Bratton Road, Westbury. This would provide the opportunity to deliver a sustainable development in accordance with the NPPF, addressing the three dimensions of economic, social and environmental sustainability. Westbury lies in the North and West Wiltshire Housing Market Area (NWWHMA).</p> <p>The site is located on the eastern edge of Westbury, immediately adjacent to the settlement boundary. It is bordered to the north and to the east by agricultural land, apart from a small section to the northwest which is adjacent to Coach Road. To the south is Bratton Road and a cemetery, while to the west, a small area of amenity land separates the site from Bitham Park. To the west of Bitham Park is an existing housing development.</p> <p>An application for development comprising up to 47 new dwellings (reference 16/06413/OUT) was refused in January 2017 and is now the subject of an Appeal against the decision. The assessment of the site's characteristics carried out to inform the decision concludes that there are no aspects of the proposal that would make it unacceptable, except for the conflict with policy on development outside the settlement boundary and the need to contribute to the improvement of employment opportunities and other services and facilities in the town centre.</p> <p>Contribution to Supply</p> <p>As we discuss elsewhere, Wiltshire Council state that they can currently¹ demonstrate a five year supply of housing land in the NWWHMA. However, this follows a period when a 5 year supply has not been demonstrated and thus we consider the supply position is fragile and in need of more sites to be identified to ensure that the supply is maintained.</p> <p>Table 4.1 of the draft Site Allocations Plan sets out an overall requirement for the NWWHMA of 24,740 dwellings for 2016 to 2026, identified completions between 2006 and 2017 of 12,603 dwellings and identified commitments of 11,566. This leaves a minimum to be allocated of 571 dwellings.</p> <p>Table 4.10 of the draft Allocations Plan confirms a surplus of identified supply over the requirement for Westbury. However, it also confirms that there is only a 1% positive variation across all the urban areas. Table 5.4 of Topic Paper 4 confirms that excluding windfalls there is a surplus across the whole plan area of only 624 dwellings, or 2.5% of the total requirement.</p> <p>Table 4.10 also highlights the significant deficit in supply in terms of both Warminster and Trowbridge, which are higher order 'Principal Settlements' as identified in the Core Strategy. Both these towns are in close proximity to Westbury with Warminster being approximately 4 miles distant and Trowbridge is some 6 miles away. Good public transport links are available to both settlements and there is therefore the case that development at Westbury can in the short term assist in addressing the shortfall that seems to be persisting in the growth of these settlements compared to the aims of the Core Strategy.</p> <p>The Topic Paper 4 (Developing Plan Proposals) published alongside the draft Site Allocations Plan provides further analysis of the identified housing supply and the relationship with the spatial strategy set out in the Core Strategy. Table 5.5 provides an analysis for the 5 year housing land supply (2017 to 2022) for the NWWHMA. This states that there is a deliverable supply of 9,643 units or 7.15 years supply over this period. Table 5.7 then sets out the conclusions of the Council's 'resilience testing' assessment for the sources of the supply. This notes that</p>				

“over a quarter of new dwellings are anticipated to be built on strategic sites and plan allocations that do not have planning permission.”
The table further notes that:
“In the past five years overall completions have continued to be just below the average annualized HMA figure.....Falling short of annualized rates can imply that there is vulnerability in the surety of supply.”
At paragraph 5.11, the paper goes on to state:
“There is a significant reliance on large strategic housing sites to meet strategic requirements in the HMA.”
While at paragraph 5.12, with respect to the expanding role of the strategic sites in contributing to housing growth, the paper states that:
“It would however be unwise to place too much reliance on this being the case when some key strategic sites have yet to gain planning permission.”
The acknowledgement that the ability of the plan to deliver housing growth is reliant on large strategic allocations with the associated risks that delivery will be delayed is evidence that supports the allocation of further sites where they are evidently deliverable and not strategic in scale, particularly in the short term.
We therefore consider that there is a need for additional sites to be brought forward in the short term in Westbury to provide for the necessary level of flexibility within the plan proposals for delivering new housing. We will set out here that the site at Bratton Road has no site specific constraints to development, is of a scale that does not require significant infrastructure to be provided in advance and could be delivered in the very near future.

Sustainable Development
The site is located within a reasonable walking distance of the important everyday services and facilities available locally and within Westbury town.
The site is also accessible by non-car modes of transport. Bus services are available from stops close to the site with these being appropriately timed and to an appropriate frequency to allow for higher order retail trips, leisure trips and some employment trips. Cycle access can be obtained via the former Coach Road and Bitham Park.
Delivery of this site would contribute to social sustainability as it is proposed to deliver up to 47 new dwellings, including 14 affordable homes to meet the required 30% contribution and the remainder being open market housing. This would meet identified housing needs in the NWWHMA as defined in the adopted Core Strategy.

In terms of economic sustainability, development of housing at this site would:
Create construction related jobs and indirect jobs during the build programme, benefiting local contractors and suppliers;
Help to ensure that there is a stable workforce in terms of ability and age;
Lead to an increased expenditure in Westbury and the surrounding area by residents of the scheme. The proposed development would therefore generate significant spending in the Wiltshire which would help create full time jobs in the local retail, service and leisure sectors;
In addition to the above, deliver a New Homes Bonus and Council Tax income for the Council.

With respect to the environmental aspect of sustainable development,
The allocation of our client’s site would result in the loss of open countryside. However, we note that the Council is relying on sites in the open countryside to meet its housing requirement to 2026 elsewhere across the plan area;
No concerns with respect to flood risk or drainage have been raised during consideration of technical work underpinning the proposals. The site lies within Flood Risk Zone 1;
Access would be taken from a priority junction on Bratton Road. An assessment of the transport impacts has not found any severe adverse impact and there were no objections on highways grounds to the earlier application;
The site is not subject to any special landscape designations. In terms of trees and hedges, these would be retained wherever possible. Potential ecological impacts as a result of disturbance to bats can be mitigated through careful design and other specific measures. There were no objections to the application for ecological, landscape or arboricultural reasons;
In summary, the loss of open countryside and agricultural land does not significantly or demonstrably outweigh the significant benefits the proposed development would deliver.
We therefore seek that this site is allocated in the Wiltshire Housing Site Allocations Plan.

Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Wainhomes is a key developer in Wiltshire with sites west of Swindon, Trowbridge and Royal Wootton Bassett. Our client has additional sites which we consider should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.

Comment ID:	3058	Consultee Wainhomes (South West) Holdings Ltd	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 389564	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		At the time of writing, both the draft plan and the published evidence apply a base date of the 1st April 2017, although these figures are provisional as the final figures are yet to be published. This is unfortunate given the time that has passed since the base date and that representations are now being sought on this Pre-Submission Stage. From previous examinations we have been involved in, it is not uncommon for the Council to update or provide new evidence in relation to its housing land supply position post submission of the plan, or even during the examination. In this instance Topic Paper 3 advises that the housing supply will be updated to the 1st April 2017 base date prior to the consultation on the submission draft. Therefore at that stage we can give full and proper consideration and respond to that new evidence which will be prepared in order to demonstrate that the plan is sound.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Wainhomes is a key developer in Wiltshire with sites west of Swindon, Trowbridge and Royal Wootton Bassett. Our client has additional sites which we consider should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.			

Comment ID:	3059	Consultee Wainhomes (South West) Holdings Ltd	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 389564	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Overall housing provision 2006-2026</p> <p>Paragraph 14 of the Framework requires that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. No definition of rapid change is provided, but in our view the potential delay or non-delivery of sites is precisely the kind of rapid change the Framework requires the LPA to provide flexibility for. Even where Local Plans are produced in more than one part, as is the case in Wiltshire, in practice each DPD takes a number of years to produce and adopt, and therefore reviewing the plan (even in part) is not usually an effective response to a shortfall in housing land supply. Plans should have the inbuilt flexibility to ensure that a shortfall in housing land supply is never encountered throughout the lifetime of the plan.</p> <p>It is important to note that the housing requirement set by Core Policy 2 of the adopted Core Strategy is a minimum requirement. The Core Strategy Inspector's Report states at paragraph 40:</p> <p>"The overall indicated quantities of development provide a flexible and positive basis for provision to meet predominantly the needs of the area. These are appropriately expressed as minimums."</p> <p>However our concern is that within the Allocations DPD as presently drafted, insufficient flexibility has been built into the supply. In our view, the Allocations DPD needs to plan for significantly more housing than just the minimum requirement, to provide a realistic prospect of the overall requirement being met.</p> <p>It is also noted that the Core Strategy Inspector states at paragraph 78:</p> <p>78. Overall, the balance of evidence suggests that the objectively assessed housing need, to be disaggregated across the three Wiltshire HMAs, is currently in the region of 44,000 dwellings over the plan period.</p> <p>This is 2,000 dwellings more than the 42,000 in the adopted Core Strategy. The reasons for not applying the full objectively assessed need are set out in paragraph 80 of the Inspectors Report which are:</p> <p>A deliverability issue in that the average delivery rate would be 2,100 over the entire plan period which would be significantly above recent annual performance and the longer term historic average as a whole.</p> <p>the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly.</p> <p>he was "particularly mindful that the Council intends to produce a new SHMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes".</p> <p>Consequently the Core Strategy Inspector stated that "at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more".</p> <p>A number of points arise:</p>				

The first is that the Inspector based his conclusion to reduce the requirement on the basis that there would be a new SHMA. That has not occurred.

The second is that he set out that the plan could provide greater flexibility to provide more homes.

We now assess how that is being achieved by the adopted and emerging development plan.

Topic Paper 4 (Developing Plan Proposals) sets out the housing position for each of the housing market areas in Wiltshire. As our clients sites are located within the North and West Housing Market Area, these representations concentrate on that area.

Table 5.4 of Topic Paper 4 sets out the position to meet the housing requirement for the North and West Housing Market Area between 2006 and 2026. For ease of reference the table is below. [see attached]

As can be seen from the table, the supply only just meets the overall requirement, with an oversupply of just 624 dwellings against a minimum requirement of 24,740 which equates to a flexibility of just 2.5%. Therefore there is insufficient flexibility to deal with the potential non- delivery of sites in part or full.

As a result it is apparent that the Allocations DPD is not allocating enough land. Even where sites can be demonstrated to be developable, there should always be a contingency in place in the event that they do not come forward as expected.

The Local Plans Expert Group has strongly advocated providing a high degree of flexibility in the supply of housing land. The group published its report to the Communities Secretary and the Minister of Housing and Planning in March 2016. Although it remains how the conclusions of the report will be taken forward as national policy is revised, they nevertheless highlight a number of common failings in plan making that often result in recently adopted plans being found to be 'out-of-date' not long after adoption. Paragraph 11.2 of the report identifies that particular problems currently occur with identifying and maintaining a five year supply of housing land, not least because:

the factors affecting a five year land supply calculation are 'live', in the sense that matters such as build rates, site circumstances etc. change constantly so that, whatever a Local Plan Inspector finds as a result of the local plan examination will be out of date even before the local plan is adopted;

even though local plan examinations are often dominated by five year supply issues, they rarely have the time to address the full detail properly and there are several examples of appeals being won on the five year issue immediately after a local plan has been adopted because further scrutiny is possible through section 78 appeals;

even where a Local Plan has recently been found sound – with a housing requirement that meets OAN – the subsequent publication of new household projections or other data is being cited by developers and others as reason to argue that the plan is out of date;

because Plans tend only to allocate the minimum amount of land they consider necessary, once adopted, there is little that Local Plans can do to address any shortages that appear in the five year supply. Any shortages, therefore, trigger (slow) local plan reviews meaning that shortfalls tend to be addressed by application or appeal led solutions, rather than plan-led solutions; and

the combination of short term focus, coupled with inevitable long term shortcomings, then encourages the concept of plans being found sound subject to early reviews, which undermines the credibility and sustainability of the plan-led system.

One of the report's recommendations (paragraph 11.4) is that local plans should not only demonstrate a five year land supply, but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable reserve sites equivalent to 20% of their housing requirement. In the case of Wiltshire, where the requirement is a minimum, we see no specific need for reserve sites, providing that sufficient flexibility is built into the housing supply; at present it is not.

At present the recommendations of the Group are just that; recommendations. However their conclusions reflect the concerns that we have in respect of the Site Allocations DPD. We consider that there is insufficient flexibility to deal with changing circumstances, specifically a failure to deliver housing at the anticipated rates. There are also no reserve or backup sites proposed. Consequently, the reality is that any slippage from the allocated or committed sites could result in the housing requirement not being met. This would have serious implications in terms of the failure to meet identified housing need, and also the plan would be 'out-of-date'. This could happen almost immediately following adoption, as has been widely experienced elsewhere. Further sites should therefore be allocated.

Conclusions

There a number of key conclusions from this section.

	<p>The first is that it is not properly prepared as the OAN was 44,000 dwellings as confirmed by the Core Strategy Inspector. The requirement of 42,000 was adopted on the basis that: It was a minimum; The Core Strategy provided flexibility; and, The Council would undertake a SHMA in 2016. That has subsequently not been undertaken.</p> <p>The second is that the Site Allocations Plan should be providing sufficient sites to meet the 44,000 dwelling OAN. The plan is not effective or consistent with national policy.</p> <p>The third is that even on the requirement in the Core Strategy there is insufficient flexibility and a greater number of sites should be allocated for development. As drafted the plan is not effective or consistent with national policy.</p> <p>Under either scenario, a greater number of sites should be allocated which can assist meeting the housing needs in Wiltshire and specifically the North and West HMA. Our clients have 3 that are deliverable in the 5 year period. As drafted the plan is not justified.</p>
Attached files (Please see Objective)	4739831
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Wainhomes is a key developer in Wiltshire with sites west of Swindon, Trowbridge and Royal Wootton Bassett. Our client has additional sites which we consider should be allocated to ensure a deliverable supply of housing land in the plan period to meet the OAN for Wiltshire. Our objections go directly to the soundness of the plan.

Comment ID:	3060	Consultee Wainhomes (South West) Holdings Ltd	Agent Mr Stephen Harris Director	Do you consider the draft WHSAP is legally compliant?	Yes												
		Person ID: 389564	Emery Planning Person ID: 389561	Do you consider the draft WHSAP is sound?	No												
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared													
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy		Justified													
				Effective													
				Consistent with national policy													
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The fourth bullet point of paragraph 47 of the Framework provides: “for market and affordable housing, [local planning authorities should] illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target;”</p> <p>The Council has published its provisional 2017 statement which forms part of the evidence base for this consultation. It will be necessary for representors to be provided with the opportunity to comment in full on the document once it is finalised and published.</p> <p>Appendix C of the adopted Core Strategy includes a housing trajectory. That trajectory was based on the housing land supply paper (July 2014) and considered sound by the Inspector.</p> <p>The Council has produced a housing trajectory as part of this consultation and is set out in more detail in Topic Paper 4. It is noted that when comparing the two trajectories (as set out below) [see attached] it is clear that for the North and West Housing Market Area the expected level of completions have not been delivered.</p> <p>Adopted Core Strategy Trajectory [see attached] March 2017 Trajectory [see attached]</p> <p>It is noted from the above two trajectories the expected levels of development since 2014/15 have not been met and the trajectory is now fundamentally different in its expectations. Indeed, last year 1,738 dwellings were completed across Wiltshire with only 847 being delivered in the North and West HMA. The table below shows how that compares for each year since the start of the plan period.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Completions</th> </tr> </thead> <tbody> <tr> <td>2006/07</td> <td>1,365</td> </tr> <tr> <td>2007/08</td> <td>1,609</td> </tr> <tr> <td>2008/09</td> <td>999</td> </tr> <tr> <td>2009/10</td> <td>926</td> </tr> <tr> <td>2010/11</td> <td>1,219</td> </tr> </tbody> </table>					Year	Completions	2006/07	1,365	2007/08	1,609	2008/09	999	2009/10	926	2010/11	1,219
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	2011/12	1,028																	
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Attached files (Please see Objective)	4739831																		
If your representation is seeking a change, do you consider it necessary to																			

participate at the oral part of the examination?	
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Comment ID:	3061	Consultee Keysley Ltd	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137935	Person ID: 556489	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.8 Bore Hill Farm Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>It is noted that Policy H2 and H2.8 of the Draft Plan allocates approximately 4.47ha of land at Bore Hill Farm/Bradley Road as shown on Figure 5.12. This combines two sites submitted for the SHLAA - Site 302 and Site 1032. (See site plan attached). The two sites are in separate ownership but the owners, through their agents, have been collaborating on a joint proposal.</p> <p>Please note the more accurate site area of the two sites provided in separate representations by the agents for Site 1032, which gives a combined site area of 5.14ha.</p> <p>It is also recognised that para 5.96 of the Draft Plan states that: 'Future development of the site shall be brought forward in such a way that ensures the residential and employment uses on the site are compatible.' The landowners acknowledge this, and future proposals will be drawn up accordingly.</p> <p>The Warminster Community Area Topic Paper, which accompanies the Draft Plan, explains in para 5.22 that the sites have been combined 'as together they present an opportunity to holistically provide a significant level of housing development in a sustainable location to ensure the provision of a suitable access/egress arrangement, open space and landscaping.' With the other two sites allocated in Warminster, they are described as 'available, achievable and deliverable'. The owners confirm that collaboration will continue to deliver these proposals at an early date, to satisfy current housing and employment needs.</p> <p>Paragraph 5.23 explains that the combined site is allocated for the development of approximately 70 dwellings. It goes on to state that the site 'is in a location that has the capacity to accommodate change from an environmental , landscape and heritage perspective, and could assimilate into the existing built form of the town. The site is in an accessible and sustainable location served by existing highways infrastructure'.... 'The development of approximately 70 dwellings would contribute towards the availability of affordable and open market housing at Warminster'. All of these positive comments are supported, and follow similar representations which accompanied the SHLAA submissions.</p>			
Attached files (Please see Objective)		4745769			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		We wish to participate at the oral examination.			

Comment ID:	3062	Consultee Keysley Ltd	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137935	Person ID: 556489	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.8 Bore Hill Farm Warminster			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>However, as mentioned in the representations submitted separately on Site 1032 , further capacity studies have been undertaken for the combined site and the housing capacity is somewhere between 110 - 120.</p> <p>We would also point out that Site 302 is already serviced off Bradley Road and some of the proposed dwellings on this part of the site may well be able to be serviced from this direction.</p> <p>All landscape and noise mitigation measures suggested in the Draft Plan would be taken into account as proposals are firmed up.</p> <p>Sites 302 and 1032 in policies H2 and H2.18 in the Draft Plan is supported. The only changes suggested are:</p> <ul style="list-style-type: none"> • Combined site area to be revised to 5.14ha; • Housing allocation to be revised to 110; 				
Attached files (Please see Objective)	4745769				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We wish to participate at the oral examination.				

Comment ID:	3063	Consultee Mr Steven Roberts Town Planning Manager	Agent Mrs Kate Gapper Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Asda Stores Ltd Person ID: 1136627	RPS Planning & Development Person ID: 1136618	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.1		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Plan Objectives and Housing Need</p> <p>The Wiltshire Housing Site Allocations Plan (June 2017), herein referred to as ‘the Draft Plan’, advises at paragraph 1.1, that its purpose is to: Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire’s three HMAs over the period to 2026.</p> <p>The Wiltshire Core Strategy (WCS) refers to the role of the Draft Plan, in combination with the Chippenham Site Allocations Plan, to help ensure a sufficient choice and supply of suitable sites throughout the plan period in accordance with national policy and to compliment neighbourhood planning (paragraph 1.4).</p> <p>Core Policy 2 of the WCS sets out the Delivery Strategy for the Draft Plan, which seeks to deliver a minimum of 42,000 new homes across Wiltshire over the period 2006 and 2026, including the provision of at least 10,420 new dwellings within the South Wiltshire Housing Market Area (HMA).</p> <p>The Draft Plan refers to the NPPF’s requirement that each Local Planning Authority demonstrate that there is a five year supply of deliverable land for housing development for each of the HMA’s based on the implied delivery rates of the WCS requirement (paragraph 2.14). Completions to date (2006-2017) in the South Wiltshire HMA is 5,067. Leaving a minimum requirement for 5,353 homes to be completed in the next nine years to 2026. The Draft Plan, at paragraph 4.2, acknowledges that a surplus is necessary to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.</p> <p>Excluding an allowance for windfall, the housing land supply in the South Wiltshire HMA can be summarised as follows: (See attached Table 1)</p> <p>Paragraph 4.63 of the Draft Plan acknowledges that the South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire and as can be seen from Table 1 below there has been persistent under delivery in the South Wiltshire HMA for the period 2006-2014. Indeed, over the last 10 years the at least requirement has only been met on two occasions. (See attached Table 2)</p> <p>The Five year housing land supply position for the South Wiltshire HMA, including windfalls, is as shown in the two tables below: (See attached Tables 3 and 4)</p> <p>What is clear from the above tables is that whilst the scale of housing meets the requirements for the HMA plan period, the buffer (shown in brackets) is not sufficient to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land as advised by the NPPF (para 47).</p> <p>The opportunity therefore exists to ensure the housing provision in the WCS is achieved. The overall purpose of the buffer is not just to deliver homes over and above the minimum requirement (10,420). Rather, the aim of the buffer should be to reduce the risk of not achieving the</p>				

minimum requirement rather than increasing the prospect of exceeding the minimum requirement. It is therefore considered that a 20% buffer is necessary to meet the housing need in a sustainable planned fashion.

By allocating sites to match the minimum requirement, plus 20%, the certainty to achieve the minimum is increased and any 'Windfall' sites will deliver over and above the minimum portion. Reducing the risk of failing to meet the minimum requirement will boost significantly the supply of housing (NPPF para 47). The expected supply, that is the allocations, should be set to achieve the minimum requirement.

1 Table 2.2 of the Wiltshire Housing Site Allocations Plan, Pre-Submission Draft Plan, Topic Paper 4 Developing Plan Proposals June 2017

Changes required

Allocate sites to match the minimum required plus 20% in order to ensure the minimum required is achieved.

Utilise windfall sites to achieve delivery beyond the minimum required.

Add allocations for additional homes in the South Wiltshire HMA.

Excluding an allowance for windfalls, anticipated land supply in the South Wiltshire Housing Market Area compared to strategic requirements, according to the Topic Paper 4 Developing Plan Proposals (Table 6.4) delivers a 'surplus' of 3.75% (201 homes) of the remaining requirement. This assumes all the commitments and proposed allocations are delivered. To be prudent and pragmatic a 20% buffer should be applied to reduce the risk of a shortfall as a consequence of not all of the commitments and allocations delivering. This is particularly pertinent as the Plan is intended to achieve more than 42,000 homes overall and more than 10,420 homes in the SWHMA. The 201 homes is not a surplus it is, if all the sites deliver, 1.93% of the 'at least' requirement. It is therefore a minor achievement of the overall objective of the WCS. The NPPF (para 47) advocates the application of a 20% to have a realistic prospect of achieving the planned supply. The planned supply is more than 42,000 homes.

Core Strategy Reviewed

The latest Local Development Scheme (LDS) shifts from a Core Strategy review to the completion of a new Local Plan. Aligned but separate local plans for Wiltshire and Swindon are to be undertaken, informed by a joint evidence base and a non-statutory 'joint framework' covering matters similar to a joint strategic plan which both authorities are 'signed' up to.

The Wiltshire Local Plan is anticipated to be adopted by early 2021 depending upon a variety of factors including a jointly agreed with Swindon Spatial Framework by mid-2019. If this timetable is achieved the early review of the WCS will have been completed seven years after the WCS Inspectors report was completed.

Again, to minimise the risk of failure to achieve the requirements of the WCS the changes sought above should be applied to the WHSAP to cover the period to 2021 and beyond if there is delay. If the WHSAP is adopted as anticipated by winter 2018 this will be twelve years into the twenty-year development plan period.

I am instructed by my client, Asda Stores Ltd, to submit the enclosed representations to the Pre- Submission Draft Wiltshire Housing Site Allocations Plan. The representations are made in respect of land at Salisbury Retail Park, London Road, Bishopdown, Salisbury, herein referred to as the 'Asda' site.

You will be aware that the 'Asda' site has an extant planning permission for a bulky goods retailing scheme, dating back to the 1990's, and that more recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.

Unfortunately, due to a change in market conditions, there is no longer a requirement for a foodstore in this location. This brownfield site is therefore immediately available for alternative forms of development, and for the reasons detailed in our representations, it is considered to be a suitable site for residential development.

The representations, as submitted, therefore object to the proposed revised settlement boundary for Salisbury and suggest that the 'Asda' site, being a brownfield site that is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods, is appropriate for housing. It should therefore either be allocated for housing or included within the revised settlement boundary.

The 'Asda' site lies on the northeastern edge of Salisbury in the Bishopdown area of the city, and fronts on to Pearce Way and the A30 London Road. It extends to 3.9 hectares and has a history of planning consents. The site has an extant planning permission for a bulky goods retailing scheme, which was approved in the mid 1990's and a start was made on the scheme, (the creation of an access arrangement off London Road). Planning permission was subsequently granted for a similar bulky goods retail scheme in 2009 (application ref S/2007/1460 refers). This permission was subsequently renewed by later applications for modifications to the scheme until April 2015. More recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.

	<p>Vehicular access into the site would be taken from the roundabout at the junction of the A30 and Pearce Way, at which point where preliminary ground works associated with an access has been undertaken previously.</p> <p>The site is bounded to the west by Green Lane, a pedestrian and cycle path that separates it from residential properties on St Lukes Close; Myrrfield Road; Lindford Road and Monxton Close, and to the east by the A30 London Road and Pearce Way: to the northeast on the other side of Pearce Way is a Premier Inn motel and the Hampton Inn pub-restaurant, while to the southeast running down London Road are a number of car dealerships. Further south along London Road are additional commercial premises, including a health & fitness centre and a petrol filling station containing a small M&S Simply Food, as well as a Park & Ride facility that is accessed off the St Thomas Way/London Road roundabout just south of the site. To the southwest the site abuts the rear gardens of Bishopdown Cottages, a small terrace of houses. Land to the north of Pearce Way is allocated for new housing within the adopted Core Strategy and has recently been developed (Hampton Park).</p> <p>With regards the suitability of the site for housing, in granting consent for the retail development of the site, the Local Planning Authority recognises that the site falls within the definition of brownfield previously developed land due to the extant planning permission on the site from the 1990's. Officers, in their report to committee for the Asda scheme, also recognised that the site is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods.</p> <p>In summary, it is considered that the 'Asda' site presents an opportunity to fulfil some of the housing requirement in the South Wiltshire HMA on a site which lies immediately adjacent to existing residential development without encroaching into the countryside and can be seen as a logical extension of this part of Bishopdown.</p>
<p>Attached files (Please see Objective)</p>	<p>4739861 / 4739859 / 4739860</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Given the complexity and significance of the issues raised it is considered necessary to be present at the oral part of the examination.</p>

Comment ID:	3064	Consultee Mr Steven Roberts Town Planning Manager	Agent Mrs Kate Gapper Associate Planner	Do you consider the draft WHSAP is legally compliant?	
		Asda Stores Ltd Person ID: 1136627	RPS Planning & Development Person ID: 1136618	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.6		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Selection</p> <p>The Plan, at paragraph 4.63, acknowledges that the South Wiltshire HMA has a slightly less generous housing land supply than elsewhere in Wiltshire. It is also acknowledged that Salisbury, which is the Principal Settlement within the HMA, is intended to be the primary focus for development, providing significant levels of jobs and homes and therefore it is important that sufficient housing is allocated to ensure the City achieves the role set out in the spatial strategy:</p> <p>The Plan recognises that it is unlikely that all the strategic sites allocated in the WCS for Salisbury would deliver sufficiently within the plan period to meet housing requirements and ensure supply, and that a shortage of land could impede the City's prospects and it could also lead to greater development pressures in other settlements in the HMA less suited to growth.</p> <p>Paragraph 4.66 refers to Churchfields which is required to deliver 1100 dwellings by 2026 but in order to do so requires substantial employment uses to decant and is now expected to commence later than envisaged and much less land for new housing will be available before 2026.</p> <p>Land at Salisbury Retail Park, London Road, Bishopdown, Salisbury</p> <p>To improve the resilience of the plan and heighten the prospects of it being effective further land should be allocated within Salisbury and it is considered that land owned by Asda Stores Ltd at London Road, Salisbury is suitable for housing being a brownfield site that is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods.</p> <p>The site lies on the northeastern edge of Salisbury in the Bishopdown area of the city, and fronts on to Pearce Way and the A30 London Road. It extends to 3.9 hectares and has a history of planning consents. The site has an extant planning permission for a bulky goods retailing scheme, which was approved in the mid 1990's and a start was made on the scheme, (the creation of an access arrangement off London Road). Planning permission was subsequently granted for a similar bulky goods retail scheme in 2009 (application ref S/2007/1460 refers). This permission was subsequently renewed by later applications for modifications to the scheme until April 2015. More recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.</p> <p>Vehicular access into the site would be taken from the roundabout at the junction of the A30 and Pearce Way, at which point some limited development has already taken place, being preliminary ground works associated with an access that was intended to serve a previously approved retail park.</p> <p>The site is bounded to the west by Green Lane, a pedestrian and cycle path that separates it from residential properties on St Lukes Close; Myrrfield Road; Lindford Road and Monxton Close, and to the east by the A30 London Road and Pearce Way: to the northeast on the other side of Pearce Way is a Premier Inn motel and the Hampton Inn pub-restaurant, while to the southeast running down London Road are a number of car dealerships. Further south along London Road are additional commercial premises, including a health & fitness centre and a petrol filling station containing a small M&S Simply Food, as well as a Park & Ride facility that is accessed off the St Thomas Way/London Road roundabout</p>				

just south of the site. To the southwest the site abuts the rear gardens of Bishopdown Cottages, a small terrace of houses. Land to the north of Pearce Way is allocated for new housing within the adopted Core Strategy and has recently been developed (Hampton Park).

As explained above, full planning permission has recently been granted for an Asda foodstore with associated petrol filling station and car parking. Unfortunately, due to a change in market conditions, there is no longer a requirement for a foodstore and therefore there is now an opportunity to utilise this brownfield site for residential development.

With regards the suitability of the site for housing, in granting consent for the retail development of the site, the Local Planning Authority recognised that the site fell within the definition of brownfield previously developed land due to the extant planning permission on the site from the 1990's. Officers, in their report to committee, also recognised that the site is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods.

In summary it is considered that the land at London Road presents an opportunity to fulfil some of the at least 5,353 homes required in the remaining plan period. The site is large enough to make a reasonable contribution to the housing land supply but not so large that it will be hindered by the complexities experienced elsewhere.

The land at Salisbury Retail Park, London Road (the 'Asda' site) should be included as an allocation for housing for reasons set out in the attached document.

Change required

Include the site Land at Salisbury Retail Park, London Road to Policy H3/ Table 5.4 of the WHSAP.

I am instructed by my client, Asda Stores Ltd, to submit the enclosed representations to the Pre- Submission Draft Wiltshire Housing Site Allocations Plan. The representations are made in respect of land at Salisbury Retail Park, London Road, Bishopdown, Salisbury, herein referred to as the 'Asda' site.

You will be aware that the 'Asda' site has an extant planning permission for a bulky goods retailing scheme, dating back to the 1990's, and that more recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.

Unfortunately, due to a change in market conditions, there is no longer a requirement for a foodstore in this location. This brownfield site is therefore immediately available for alternative forms of development, and for the reasons detailed in our representations, it is considered to be a suitable site for residential development.

The representations, as submitted, therefore object to the proposed revised settlement boundary for Salisbury and suggest that the 'Asda' site, being a brownfield site that is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods, is appropriate for housing. It should therefore either be allocated for housing or included within the revised settlement boundary.

The 'Asda' site lies on the northeastern edge of Salisbury in the Bishopdown area of the city, and fronts on to Pearce Way and the A30 London Road. It extends to 3.9 hectares and has a history of planning consents. The site has an extant planning permission for a bulky goods retailing scheme, which was approved in the mid 1990's and a start was made on the scheme, (the creation of an access arrangement off London Road). Planning permission was subsequently granted for a similar bulky goods retail scheme in 2009 (application ref S/2007/1460 refers). This permission was subsequently renewed by later applications for modifications to the scheme until April 2015. More recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.

Vehicular access into the site would be taken from the roundabout at the junction of the A30 and Pearce Way, at which point where preliminary ground works associated with an access has been undertaken previously.

The site is bounded to the west by Green Lane, a pedestrian and cycle path that separates it from residential properties on St Lukes Close; Myrrfield Road; Lindford Road and Monxton Close, and to the east by the A30 London Road and Pearce Way: to the northeast on the other side of Pearce Way is a Premier Inn motel and the Hampton Inn pub-restaurant, while to the southeast running down London Road are a number of car dealerships. Further south along London Road are additional commercial premises, including a health & fitness centre and a petrol filling station containing a small M&S Simply Food, as well as a Park & Ride facility that is accessed off the St Thomas Way/London Road roundabout just south of the site. To the southwest the site abuts the rear gardens of Bishopdown Cottages, a small terrace of houses. Land to the north of Pearce Way is allocated for new housing within the adopted Core Strategy and has recently been developed (Hampton Park).

With regards the suitability of the site for housing, in granting consent for the retail development of the site, the Local Planning Authority recognises that the site falls within the definition of brownfield previously developed land due to the extant planning permission on the site from

	<p>the 1990's. Officers, in their report to committee for the Asda scheme, also recognised that the site is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods. In summary, it is considered that the 'Asda' site presents an opportunity to fulfil some of the housing requirement in the South Wiltshire HMA on a site which lies immediately adjacent to existing residential development without encroaching into the countryside and can be seen as a logical extension of this part of Bishopdown.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>Given the complexity and significance of the issues raised it is considered necessary to be present at the oral part of the examination.</p>

Comment ID:	3065	Consultee Mr Steven Roberts Town Planning Manager	Agent Mrs Kate Gapper Associate Planner	Do you consider the draft WHSAP is legally compliant?	No
		Asda Stores Ltd Person ID: 1136627	RPS Planning & Development Person ID: 1136618	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.8			Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The five year land supply for South Wiltshire (2017-2026), as set out in Table 4.8, differs from those shown in Table 3.4 (Page 12) of the Topic Paper 3 – Housing Land Supply, June 2017.</p> <p>There are inconsistencies in the data presented throughout the plan and the supporting topic papers. This needs further scrutiny and clarification to establish the correct position.</p> <p>I am instructed by my client, Asda Stores Ltd, to submit the enclosed representations to the Pre- Submission Draft Wiltshire Housing Site Allocations Plan. The representations are made in respect of land at Salisbury Retail Park, London Road, Bishopdown, Salisbury, herein referred to as the 'Asda' site.</p> <p>You will be aware that the 'Asda' site has an extant planning permission for a bulky goods retailing scheme, dating back to the 1990's, and that more recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.</p> <p>Unfortunately, due to a change in market conditions, there is no longer a requirement for a foodstore in this location. This brownfield site is therefore immediately available for alternative forms of development, and for the reasons detailed in our representations, it is considered to be a suitable site for residential development.</p> <p>The representations, as submitted, therefore object to the proposed revised settlement boundary for Salisbury and suggest that the 'Asda' site, being a brownfield site that is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods, is appropriate for housing. It should therefore either be allocated for housing or included within the revised settlement boundary.</p> <p>The 'Asda' site lies on the northeastern edge of Salisbury in the Bishopdown area of the city, and fronts on to Pearce Way and the A30 London Road. It extends to 3.9 hectares and has a history of planning consents. The site has an extant planning permission for a bulky goods retailing scheme, which was approved in the mid 1990's and a start was made on the scheme, (the creation of an access arrangement off London Road). Planning permission was subsequently granted for a similar bulky goods retail scheme in 2009 (application ref S/2007/1460 refers). This permission was subsequently renewed by later applications for modifications to the scheme until April 2015. More recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.</p> <p>Vehicular access into the site would be taken from the roundabout at the junction of the A30 and Pearce Way, at which point where preliminary ground works associated with an access has been undertaken previously.</p> <p>The site is bounded to the west by Green Lane, a pedestrian and cycle path that separates it from residential properties on St Lukes Close; Myrrfield Road; Lindford Road and Monxton Close, and to the east by the A30 London Road and Pearce Way: to the northeast on the other side of Pearce Way is a Premier Inn motel and the Hampton Inn pub-restaurant, while to the southeast running down London Road are a number of car dealerships. Further south along London Road are additional commercial premises, including a health & fitness centre and a petrol filling station containing a small M&S Simply Food, as well as a Park & Ride facility that is accessed off the St Thomas Way/London Road roundabout</p>				

	<p>just south of the site. To the southwest the site abuts the rear gardens of Bishopdown Cottages, a small terrace of houses. Land to the north of Pearce Way is allocated for new housing within the adopted Core Strategy and has recently been developed (Hampton Park).</p> <p>With regards the suitability of the site for housing, in granting consent for the retail development of the site, the Local Planning Authority recognises that the site falls within the definition of brownfield previously developed land due to the extant planning permission on the site from the 1990's. Officers, in their report to committee for the Asda scheme, also recognised that the site is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods.</p> <p>In summary, it is considered that the 'Asda' site presents an opportunity to fulfil some of the housing requirement in the South Wiltshire HMA on a site which lies immediately adjacent to existing residential development without encroaching into the countryside and can be seen as a logical extension of this part of Bishopdown.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Given the complexity and significance of the issues raised it is considered necessary to be present at the oral part of the examination.</p>

Comment ID:	3066	Consultee Mr Steven Roberts Town Planning Manager Asda Stores Ltd Person ID: 1136627	Agent Mrs Kate Gapper Associate Planner RPS Planning & Development Person ID: 1136618	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.69				Justified Effective Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Table A.1 within Appendix A of the WHSAP Pre-Submission Draft Community Area Topic Paper for Salisbury explains why each of the proposed amendments were made to the existing settlement boundary in line with the settlement boundary review methodology. It is noted that the settlement boundary at Bishopdown (Map Grid Ref: M5, M4, L4) is proposed to be amended to include built and commenced development that is physically related to the settlement, but that the proposed revised settlement boundary does not include land at Salisbury Retail Park, London Road (the 'Asda' site).</p> <p>This 'Asda' site has a history of planning consents including an extant planning permission for a bulky goods retailing scheme, which was approved in the mid 1990's and for which a start was made on the scheme, (the creation of an access arrangement off London Road). More recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.</p> <p>Unfortunately, due to a change in market conditions, there is no longer a requirement for a foodstore in this location. Therefore there is now an opportunity to utilise this brownfield site for an alternative use such as residential development.</p> <p>In the planning officers report to committee for the Asda application, the Local Planning Authority recognises that the site falls within the definition of brownfield previously developed land due to the extant planning permission on the site from the 1990's. The LPA has also accepted that a start was made on the 1990's scheme, (the creation of an access arrangement off London Road) thus keeping the permission alive in law and in theory, enables that particular development to be continued at any time. In other words it has been accepted that development has commenced on site. Officers, in their report to committee, also recognised that the site is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods.</p> <p>Given that the site meets the criteria for being included within the settlement boundary, i.e. land which is physically related to the settlement and for which development has commenced, there is a justification for including it within the revised settlement boundary. To not do so would mean that the plan has not been positively prepared and is not consistent with national policy.</p> <p>The settlement boundary for Salisbury should be amended to include within it the land at Salisbury Retail Park, London Road (the 'Asda' site) to ensure that the plan has been positively prepared and is consistent with national policy.</p> <p>I am instructed by my client, Asda Stores Ltd, to submit the enclosed representations to the Pre- Submission Draft Wiltshire Housing Site Allocations Plan. The representations are made in respect of land at Salisbury Retail Park, London Road, Bishopdown, Salisbury, herein referred to as the 'Asda' site.</p> <p>You will be aware that the 'Asda' site has an extant planning permission for a bulky goods retailing scheme, dating back to the 1990's, and that more recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.</p>			

	<p>Unfortunately, due to a change in market conditions, there is no longer a requirement for a foodstore in this location. This brownfield site is therefore immediately available for alternative forms of development, and for the reasons detailed in our representations, it is considered to be a suitable site for residential development.</p> <p>The representations, as submitted, therefore object to the proposed revised settlement boundary for Salisbury and suggest that the 'Asda' site, being a brownfield site that is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods, is appropriate for housing. It should therefore either be allocated for housing or included within the revised settlement boundary.</p> <p>The 'Asda' site lies on the northeastern edge of Salisbury in the Bishopdown area of the city, and fronts on to Pearce Way and the A30 London Road. It extends to 3.9 hectares and has a history of planning consents. The site has an extant planning permission for a bulky goods retailing scheme, which was approved in the mid 1990's and a start was made on the scheme, (the creation of an access arrangement off London Road). Planning permission was subsequently granted for a similar bulky goods retail scheme in 2009 (application ref S/2007/1460 refers). This permission was subsequently renewed by later applications for modifications to the scheme until April 2015. More recently consent was granted for an Asda foodstore (Ref: 14/04756/FUL) which was approved on the 15th August 2017.</p> <p>Vehicular access into the site would be taken from the roundabout at the junction of the A30 and Pearce Way, at which point where preliminary ground works associated with an access has been undertaken previously.</p> <p>The site is bounded to the west by Green Lane, a pedestrian and cycle path that separates it from residential properties on St Lukes Close; Myrrfield Road; Lindford Road and Monxton Close, and to the east by the A30 London Road and Pearce Way: to the northeast on the other side of Pearce Way is a Premier Inn motel and the Hampton Inn pub-restaurant, while to the southeast running down London Road are a number of car dealerships. Further south along London Road are additional commercial premises, including a health & fitness centre and a petrol filling station containing a small M&S Simply Food, as well as a Park & Ride facility that is accessed off the St Thomas Way/London Road roundabout just south of the site. To the southwest the site abuts the rear gardens of Bishopdown Cottages, a small terrace of houses. Land to the north of Pearce Way is allocated for new housing within the adopted Core Strategy and has recently been developed (Hampton Park).</p> <p>With regards the suitability of the site for housing, in granting consent for the retail development of the site, the Local Planning Authority recognises that the site falls within the definition of brownfield previously developed land due to the extant planning permission on the site from the 1990's. Officers, in their report to committee for the Asda scheme, also recognised that the site is located within an established and growing mixed residential and commercial area with good transport links and accessible via a variety of sustainable transport methods.</p> <p>In summary, it is considered that the 'Asda' site presents an opportunity to fulfil some of the housing requirement in the South Wiltshire HMA on a site which lies immediately adjacent to existing residential development without encroaching into the countryside and can be seen as a logical extension of this part of Bishopdown.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3067	Consultee Forum Trustees Ltd & Lutea Trustees Ltd Person ID: 1136806	Agent John Jupp William Heath & Co Solicitors Person ID: 1136797	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As you are aware from our letter to you of the 24th November 2015, copy attached for ease of reference, we act for the unencumbered freeholders of the land comprised in Land Registry Title Number WT297457. We enclose HM Land Registry official office copy entry and title plan in respect of this title number by way of verification.</p> <p>We wish to make the following representations on behalf of our clients adopting the numbering of the Paper seriatim.</p> <p>Table 6.3 Stage 6.18 page 20. This states potential sites are rejected where the appraisal concludes development would result in one or more major adverse effects. Table F.1 Stage 3 page 89 defines a Major adverse effect as one adverse to the objective with no satisfactory mitigation possible. It goes on to say that as a result the Site may be inappropriate for housing development as opposed to outright rejection.</p> <p>Table 6.4 Stage 3 pages 21 and 22. This sets out the reasons for each of the Sites being rejected namely "Given the major adverse effects associated with air quality, specifically regarding odour from the nearby pig farm, the site should not be considered further in the site selection process.". Save for reference to the nearby pig farm there is no other evidence identified of adverse air quality being present. In this context we refer to Table F.16 on page 108 relating to Site S90. The Site Overview states "This site option is located in the village of Winterbourne Earls. With an area of 4.56 hectares the site has a capacity for approximately 103 dwellings; however, mitigation measures might reduce this number.". Under the heading "Assessment Results" for this Site S90 no reference is made to anything at all. This is to be contrasted with the Assessment Results at Tables F.17 and F.18 (pages 108, 109 and 110) where there is detailed references to a noise issue with the railway line and odour from the pig farm. We therefore consider that in the case of Site S90 there is no reason for this site, with a stated capacity of 103 dwellings, to be rejected. No major, moderate and or minor negative effects have been disclosed and or identified.</p> <p>Tables F.17 and F.18 pages 108, 109 and 110. In each instance the reason each site should not be considered further in the site selection process is stated as follows "Given the major adverse effects associated with air quality, specifically regarding odour from the nearby pig farm, the site should not be considered further in the site selection process.". No reference is made to noise from the railway and in the case of air quality the only identified/disclosed issue is the odour from the pig farm. In the case of Table F.17, S91, the Assessment Result states "One major beneficial effect has been identified. Development on the site would help to meet local housing needs in accordance with the policies of the Core Strategy (SA Obj.8). A moderate beneficial effect has been identified as the development will increase the local population and could have a major contribution to the local economy through use of local shops and services (SA Obj. 11) and a minor positive effect is anticipated through the site generating direct and indirect construction employment, and helping to stimulate the local economy once built (SA Obj. 12)". In similar vein Table F.18, Site S92, the Assessment Results states "One moderate beneficial effect has been identified. Development on the Site would help to meet local housing needs in accordance with the policies of the core strategy (SA Obj.8). Two minor beneficial effects have been identified. Development of the Site will increase the local population and could have a major contribution to the local economy through use of local shops and services (SA Obj. 11) and generate direct and indirect construction employment, and helping to stimulate the local economy once built (SA Obj.12)."</p> <p>As stated at 1 above a major adverse effect is one "with no satisfactory mitigation possible".</p>				

	<p>The pig farm in question is Manor Farm Pig Unit operated by Harvey. Farms (Winterbourne) Limited (Registered Number 04198240). According to the latest filings at Companies House this Company is controlled by Mr Philip Nicholas· Baker Harvey.</p> <p>The freehold land and buildings on and from which the Manor Farm Pig Unit is currently operated form part of a far larger area of agricultural land comprised in Land Registry Title Number WT163983 of which Mr Harvey is the sole registered proprietor at the Land Registry.</p> <p>On the 26th May 2017 Mr Harvey, subject to appropriate financial reimbursement, entered into a contractual commitment with our clients to facilitate residential development on Sites S90 and S91. Upon receipt of confirmation this documentation will not be released into the public domain copies can be supplied.</p> <p>As a result of the contractual commitment referred to in 4.3 above and the extent of Mr Harvey's land ownership referred to in 4.2 above satisfactory mitigation is possible.</p> <p>We understand the Environment Agency's approach to be as follows "We do not object to the development on Sites S90 and S92, but we provide a recommendation that these Sites are not used for housing developments on the basis that residents could be subject to some odours from the site, beyond the remit of the permit condition compliance". Accordingly there is not an outright objection on the part of the Environment Agency but a recommendation which needs to be seen in the context of the considerable benefits accruing were residential development to be permitted.</p> <p>We submit that there is an overwhelming case for the Sites to be allocated for housing. There is only one substantive issue at stake namely the alleged odour of the pig farm as currently operated. As identified in 4 above satisfactory mitigation is possible. The Council can therefore deliver a potential 179 additional dwelling houses with the concomitant benefits for the neighbouring school and the identified policies of the Core Strategy namely (SA Obj.8, SA Obj. 11 and SA Obj.12).</p>
<p>Attached files (Please see Objective)</p>	<p>4740068 / 4740073</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3068	Consultee Minton Group Ltd Person ID: 1136804	Agent Jenny Henderson Hunter Page Planning Ltd Person ID: 836252	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation has been prepared on behalf of my client, Minton Group Limited, regarding the Wiltshire Housing Site Allocations Plan: Pre-submission draft plan. My client is the long standing owner of Minton Distribution Park, Amesbury, which is an employment site accommodating a mix of uses including B1, B2 and B8 uses.</p> <p>However, the site unfortunately now has an ageing building stock that does not come up to modern building standards and all buildings are in need of renewal. As such, there is a need for the site to be redeveloped and it is suggested that it would represent a suitable site for mixed use development within the Allocations Plan. This letter sets out the site and policy context before reviewing the Allocations Plan and suggesting potential amendments.</p> <p>Site Context</p> <p>The site is situated to the north-east of the town of Amesbury, and is a mixed-use warehouse, industrial and office complex. The units on the site are of a considerable age and recent reports prepared to assess the current condition of the buildings indicate that they are extremely dilapidated and not fit for modern business purposes. Significant investment would be required to modernise the existing buildings in order to ensure that the site meets the required standards and legislation. Nevertheless, the current design of the buildings is also outdated and the configuration of most of the internal spaces is not suited to most modern business use.</p> <p>As a result, much of the site is currently vacant, with other larger occupiers recently giving notice that they are also vacating the site. The site is now significantly under-utilised despite positive marketing and low rents. It is therefore apparent that the building stock will need to be renewed which will require significant investment.</p> <p>There are a number of modern employment opportunities in the immediate vicinity of the site, namely to the south of the site and at Solstice Park. Solstice Park includes 64 ha industrial and distribution space, as well as trade and roadside uses including hotels, petrol station, public houses and fast food outlets. The Minton Distribution Park cannot compete with Solstice Park as they are able to provide modern purpose built buildings or simply provide employment land. The availability of employment land and buildings at Solstice Park has effectively made the Minton Distribution Park moribund and consequently redevelopment is inevitable.</p> <p>It is evident that the site currently provides low quality employment space, which needs significant investment in order to bring the site up to standard. In order to aid its redevelopment, it is suggested that the site should be considered for mixed use development within the Allocations Plan. There will be a need to provide higher value uses within this mix, to stimulate the sites demolition and clearance and to facilitate the other employment uses in this competitive market.</p>				

Planning Policy Context

Core Strategy

Core Policy 1 sets out the settlement strategy for Wiltshire and identifies four tiers of settlements namely Principle Settlements, Market Towns, Local Service Centres and Large and Small Villages. Amesbury is identified as a Market Town. The Policy highlights that Market Towns are settlements that have the ability to support sustainable patterns of living in Wiltshire through their current levels of facilities, services and employment opportunities. 'Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of selfcontainment and viable sustainable communities.'

Core Policy 2 sets out the delivery strategy which highlights that between 2006 and 2026, provision will be made for at least 178ha of new employment land and at least 42,000 homes. Core Policy 4 sets out the spatial strategy for Amesbury and identifies that Principle Employment Areas will be supported in line with Core Policy 35. The site is identified as a Principle Employment Area known as 'London Road'. It goes on to state that over the plan period (2006 to 2026), 17 ha of new employment land and approximately 2,785 new homes will be provided. The new employment land will be delivered at Boscombe Down and Porton Down, and the housing through the strategic housing allocation at Kings Gate (1,300 dwellings), as well as additional allocations to be set out through the Allocations Plan.

Commentary

The NPPF is clear at Paragraph 47 that LPA's should significantly boost the supply of housing. The figures set out in the Local Plan are a minimum target and by not allocating sufficient housing within the Amesbury Community Area, this means that the area will not be able to meet its housing need.

It is suggested that the land at Minton Distribution Park is allocated for mixed use development in order to help meet the above housing requirement, as well as enable the redevelopment of the site which is required given the context set out above.

The Amesbury Community Area Topic Paper assesses a number of sites in Amesbury, and the land north of London Road (opposite Minton Distribution Park) was taken forward to a late stage of the assessment process, but discounted because there were more sustainable options available.

However, Minton Distribution Park would represent a more sustainable option than land to the north, given the brownfield nature of the site, surrounding built form, and because its development would not extend the built form of Amesbury over the A303. As such, it is considered a suitable site which would pass the assessment criteria to enable an allocation.

Status of the Land

The NPPF states that for sites to be considered 'deliverable' means they will be available now, in a suitable location now and achievable within five years and viable, as per footnote 11 of paragraph 47.

Available

Despite being an allocated employment site, much of the site is currently vacant, with other larger occupiers recently giving notice that they are also vacating the site. The site is in single ownership, and is being promoted by the landowner. There are no legal or ownership problems which could limit development. It can, therefore, be considered to be available now.

Suitable

The site is less than 1 mile from Amesbury High Street and there are buses along London Road providing services to the town centre, as well as

	<p>Salisbury, Swindon, Marlborough as well as a number of smaller settlements. Amesbury is a sustainable town with many services and facilities, including sports and community uses, education, healthcare, employment opportunities, supermarkets as well as several shops, banks, cafes within the town centre. MOD Boscombe Down is situated to the south-east of the town.</p> <p>The site is suitably and sustainably located for residential development with good accessibility to local services, as above. There are no physical constraints that would prevent or delay development coming forward. Furthermore, the site is brownfield land. The recently published Housing White Paper (Fixing our Broken Housing Market) supports the redevelopment of brownfield land, and it is clear at 1.25 that “brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (such as flood risk)”.</p> <p>The area immediately adjacent to the site mainly comprises commercial/retail space; however, beyond Tesco to the south west is residential development. As such, the redevelopment of the site for a mix of uses would reflect the uses within the immediate vicinity. Accordingly, the site is clearly a suitable location for mixed use development.</p> <p>Achievable This site is located within a location that developers find attractive to bring forward for development. Mixed use development represents a viable future use for the site. As above, higher value uses are required on the site in order to bring it up to standard. A mixed use development of the site, containing higher value uses, is considered achievable.</p> <p>Conclusion The Allocations Plan as drafted does not meet the housing requirement identified within the Amesbury Community Area and therefore it is considered that additional sites need to be considered for housing, particularly in light of the need to ‘boost significantly the supply of housing’. Minton Distribution Park is an ageing employment site which requires significant investment. However, in light of the availability of employment land locally at Solstice Park, it is considered that the site would be more suitable for a mixed use development (including residential) which would stimulate the sites regeneration, and contribute to meeting the outstanding housing need identified. It is therefore requested that the LPA consider the allocation of the site for mixed use development within the Allocations Plan.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3069	Consultee Gallagher Estates Gallagher Estates Person ID: 1100941	Agent Mr Nathan McLoughlin Director McLoughlin Planning Person ID: 404491	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.61		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The Plan is not considered to be sound due to failings in the evidence base that underpins it. Please see attached [Text has been copied into comments 3069 as follows; and comments 3071 and 3072].</p> <p>GE's interests relate to the long-term development of land north of Royal Wootton Bassett (RWB) and full details of the land and the initial technical case for development are set out in the attached Vision Document. In making the observations below, GE is fully aware of the role of the HSADPD and its need to be in conformity with the Core Strategy.</p> <p>Objective 1: To ensure there is a clear definition to the extent of the built up areas at Principal Settlements, Market Towns, Local Service Centres and Large Villages</p> <p>GE supports the objective of the DPD in defining the clear extent of the Market Town of RWB. This addresses an existing deficiency highlighted in the Core Strategy Inspector's Report, which considered the settlement boundaries (as then concurrent with the North Wiltshire Local Plan) to be out of date. By updating the boundaries, it ensures that the extent of the Market Town is defined and that decisions about the future direction of growth can be made in a coordinated manner, through the Wiltshire Local Plan Review.</p> <p>In addition, the definition of such a boundary ensures that there is no dispute between where development can and cannot be provided in the RWB Community Area specifically in respect of the town. As set out in Core Strategy Policy CP19 and the Topic Paper that accompanies the HSADPD, there is no numerical need for additional allocations at RWB in the context of the Core Strategy housing target. This means that a subsequent Neighbourhood Plan cannot allocate additional housing land at the town, as it would be contrary to the DPD. Furthermore, it ensures that future discussions about the growth of the town can be made in a comprehensive manner through the Wiltshire Local Plan Review, unencumbered by the difficulties of administrative boundaries associated with Neighbourhood Planning.</p> <p>It is also acknowledged that the HSADPD is a 'daughter document' to the Core Strategy and its scope is limited to identifying the remaining outstanding balance of housing from the Core Strategy. However, if circumstances dictate and there is a need to identify further housing sites as a result of the Wiltshire Local Plan Review, this could be achieved through a further Site Allocations Development Plan Document as set out in the Core Strategy.</p> <p>Given the following:</p> <ul style="list-style-type: none"> Well documented difficulties Swindon Borough is experiencing with 5-year housing land supply; The initial findings of the SHMA; and The proposed re-drawing of the Housing Market Areas to create a new Swindon HMA, which may be cross-boundary <p>GE's site should be considered as an option for a strategic urban extension to assist both LPAs in meeting their respective housing requirements and timely plan preparation. There are a number of precedents in other LPAs, with the South Worcestershire and Joint Core Strategy for Cheltenham, Gloucester and Tewkesbury demonstrating how an overall strategic target can be disaggregated to individual LPAs.</p> <p>In terms of future development at RWB, accompanying this plan is a Vision Document promoting land north of Swindon Road as a long-term strategic allocation. The prospective allocation incorporates circa 400 open market and affordable dwellings; a local hub area to include a</p>			

	<p>community/co-working centre; commercial/employment uses; leisure and recreational facilities; and extensive open space networks, including woodland planting, green corridors, sustainable drainage features, ecological improvements and a network of new footpaths and cycleways. The purpose of the Document is to demonstrate the basic site conditions and deliverability of the site. It does however, also present a development opportunity should the HSA run into difficulties and have to allocate additional sites.</p> <p>We would welcome the opportunity to discuss this in more detail as both the HSADPD and Local Plan Review process evolves.</p>
Attached files (Please see Objective)	4740060
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to fully articulate the case in front of the Inspector.

Comment ID:	3070	Consultee Minton Group Ltd	Agent Jenny Henderson Hunter Page Planning Ltd	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136804	Person ID: 836252	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	[Minton Distribution park, Amesbury] The Allocations Plan includes a review of the Settlement Boundary and it is proposed for this site to be included within the Settlement Boundary for Amesbury. The inclusion of the site within the boundary is supported, given the sites current use, its brownfield nature and its physical and functional relationship to the settlement.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3071	Consultee Gallagher Estates Gallagher Estates Person ID: 1100941	Agent Mr Nathan McLoughlin Director McLoughlin Planning Person ID: 404491	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.30-4.33			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GE's interests relate to the long-term development of land north of Royal Wootton Bassett (RWB) and full details of the land and the initial technical case for development are set out in the attached Vision Document. In making the observations below, GE is fully aware of the role of the HSADPD and its need to be in conformity with the Core Strategy.</p> <p>Objective 2: To help demonstrate a rolling five year supply of deliverable land for housing development</p> <p>GE strongly supports the need for the Council to maintain a 5-year housing land supply. This is critical in light of the fact that the Core Strategy Inspector recognised the Council commitment to undertaking an early review of the CS.</p> <p>However, the context for preparing the HSADPD is the Core Strategy, which is based on a housing target that is in need of immediate review. Therefore, whilst the DPD is clearly assisting the Council in maintaining a 5-year housing land supply figure, the level of provision conflicts with the requirements of Framework Paragraph 47 that requires LPA to ensure that the Local Plan meets the "full objectively assessed needs for market and affordable housing".</p> <p>The risks associated with under-delivery of units and the lower housing target can be highlighted in the Council's approach to the determination of the Land at Marsh Farm Application (14/08060/OUT) which saw an outline planning application for up to 320 dwellings and other uses being recommended for approval on the basis of the Council not having a 5-year supply of housing land. Whilst the application was subsequently refused at the following strategic committee, it underlines a concern that the lack of progress on the Local Plan Review and the constrained nature of the housing policy in RWB mean that situations could arise which could see major decisions about the future of RWB being made via the planning application/appeal route. Therefore, the emphasis is on the Council to quickly resolve the HSADPD and proceed with the Local Plan Review.</p> <p>Given the following:</p> <ul style="list-style-type: none"> Well documented difficulties Swindon Borough is experiencing with 5-year housing land supply; The initial findings of the SHMA; and The proposed re-drawing of the Housing Market Areas to create a new Swindon HMA, which may be cross-boundary <p>GE's site should be considered as an option for a strategic urban extension to assist both LPAs in meeting their respective housing requirements and timely plan preparation. There are a number of precedents in other LPAs, with the South Worcestershire and Joint Core Strategy for Cheltenham, Gloucester and Tewkesbury demonstrating how an overall strategic target can be disaggregated to individual LPAs.</p> <p>In terms of future development at RWB, accompanying this plan is a Vision Document promoting land north of Swindon Road as a long-term strategic allocation. The prospective allocation incorporates circa 400 open market and affordable dwellings; a local hub area to include a community/co-working centre; commercial/employment uses; leisure and recreational facilities; and extensive open space networks, including</p>				

	<p>woodland planting, green corridors, sustainable drainage features, ecological improvements and a network of new footpaths and cycleways. The purpose of the Document is to demonstrate the basic site conditions and deliverability of the site. It does however, also present a development opportunity should the HSA run into difficulties and have to allocate additional sites.</p> <p>We would welcome the opportunity to discuss this in more detail as both the HSADPD and Local Plan Review process evolves.</p>
Attached files (Please see Objective)	4740060
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to fully articulate the case in front of the Inspector.

Comment ID:	3072	Consultee Gallagher Estates Gallagher Estates	Agent Mr Nathan McLoughlin Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1100941	McLoughlin Planning Person ID: 404491	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.44-4.61			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>GE's interests relate to the long-term development of land north of Royal Wootton Bassett (RWB) and full details of the land and the initial technical case for development are set out in the attached Vision Document. In making the observations below, GE is fully aware of the role of the HSADPD and its need to be in conformity with the Core Strategy.</p> <p>Objective 3: To allocate sites at the settlements in the County that supports the spatial strategy of the Wiltshire Core Strategy.</p> <p>GE supports the approach of the HSADPD in making allocations concurrent with the requirements of the Core Strategy. To do otherwise would risk the HSADPD not in conformity with the Core Strategy and would otherwise be unsound. GE still wishes to express its concerns about the lack of additional housing at RWB and meeting the requirements of Framework paragraph 47, but accepts the limitations being placed on the DPD.</p> <p>Other Matters</p> <p>GE is concerned that the drive to prepare the DPD presents an unnecessary burden on the Council in undertaking a review of the Wiltshire Core Strategy.</p> <p>It is already clear from the Cabinet papers of the 12 September meeting that there is a clear commitment to review the Core Strategy. Whilst the details of the emerging Local Plan housing target remain confidential, the papers make reference to the fact that the housing market areas will be subject to change, with the potential introduction of a Swindon Housing Market Area. The introduction of such an approach is a positive move as it will look to address one of the concerns highlighted by the Core Strategy Inspector (paragraph 68 of his report) which saw the delineation of the HMAs concurrent with the County boundary as being "artificial".</p> <p>On-going work between Wiltshire Council and Swindon Borough through the JSEC has identified that the OAN for housing between the two LPAs over a 20 year period from 2016 to 2036 is 72,000 dwellings or 3,600 per annum. It is understood that the exact means by how this is to be delivered is yet to be finalised, but is understood to be in the region of an additional 50 dwellings per annum for Wiltshire.</p> <p>Given the following:</p> <ul style="list-style-type: none"> Well documented difficulties Swindon Borough is experiencing with 5-year housing land supply; The initial findings of the SHMA; and The proposed re-drawing of the Housing Market Areas to create a new Swindon HMA, which may be cross-boundary <p>GE's site should be considered as an option for a strategic urban extension to assist both LPAs in meeting their respective housing requirements and timely plan preparation. There are a number of precedents in other LPAs, with the South Worcestershire and Joint Core Strategy for Cheltenham, Gloucester and Tewkesbury demonstrating how an overall strategic target can be disaggregated to individual LPAs.</p> <p>In terms of future development at RWB, accompanying this plan is a Vision Document promoting land north of Swindon Road as a long-term strategic allocation. The prospective allocation incorporates circa 400 open market and affordable dwellings; a local hub area to include a community/co-working centre; commercial/employment uses; leisure and recreational facilities; and extensive open space networks, including woodland planting, green corridors, sustainable drainage features, ecological improvements and a network of new footpaths and cycleways. The</p>				

	<p>purpose of the Document is to demonstrate the basic site conditions and deliverability of the site. It does however, also present a development opportunity should the HSA run into difficulties and have to allocate additional sites. We would welcome the opportunity to discuss this in more detail as both the HSADPD and Local Plan Review process evolves.</p>
Attached files (Please see Objective)	4740730 / 4740060
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to fully articulate the case in front of the Inspector.

Comment ID:	3073	Consultee Minton Group Ltd	Agent Jenny Henderson Hunter Page Planning Ltd	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136804	Person ID: 836252	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Allocations Plan</p> <p>The Allocations Plan Pre-Submission Draft and its evidence base, namely 'Community Area Topic Paper – Amesbury June 2017' looks at the overall housing requirement for the Community Area, the residual housing requirement and allocates sites for development. The Topic Paper assessed a number of sites within the Community Area and only two sites have been taken forward for residential development: Clover Lane, Durrington (45 dwellings) and Larkhill Road, Durrington (15 dwellings).</p> <p>However, the evidence base identifies a residual requirement of 181 dwellings within the Community Area (as set out at p8 of the Amesbury Community Area Topic Paper), of which 73 should be identified within the market towns of Amesbury, Bulford and Durrington, and 108 across the remainder of the community area.</p> <p>The Allocations Plan allocates 60 dwellings in Durrington. In respect of the wider community area, the made Idmiston Neighbourhood Plan is proposing to allocate 32 dwellings in Porton. Consequently, the overall residual housing requirement for the Amesbury Community Area Remainder can be adjusted to 76 dwellings. However, none of the sites assessed within the Topic Paper for the wider Community Area have been taken forward as allocations. As such, the housing requirement for the Amesbury Community Area is not met, with a shortfall of 89 dwellings remaining across the Community Area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3074	Consultee Gaynor Parkinson Strategic Land and Planning Manager	Agent Mr Dan Washington Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Linden Homes Person ID: 890227	BBA Architects and Planners Person ID: 1132859	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2 Land off the A363 at White Horse Business Park		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write on behalf of our client Linden Homes to provide representations to the pre-submission version of the Wiltshire Housing site Allocations Plan (HSAP). The representation below is made in relation to proposed allocation H2.2 Land off the A363 at White Horse Business Park, Trowbridge.</p> <p>The publication of the HSAP is long overdue. Since the adoption of the Wiltshire Core Strategy in January 2015, the timetable for the production of the HSAP has been revised a number of times. The delay in adoption of this document has had serious consequences on the supply of houses in Wiltshire and in particular the ability of the Council to demonstrate a five year supply of housing. It is therefore critical that the HSAP is adopted as soon as possible to ensure the minimum housing requirements of Wiltshire are met in accordance with the development Strategy. There is still a requirement for the Council to undertake a review of the Core Strategy and the overall housing numbers, as was highlighted by the Core Strategy Inspector on adoption. However, this should be undertaken independently of the HSAP process rather than in its stead, to ensure there is no policy void and that development accords with the approved Strategy in the short and medium term.</p> <p>The HSAP is being prepared in accordance with the Core Strategy and this is supported. The adopted Core Strategy approach to the distribution of housing, based around a focus of development towards a number of principal settlements is a sound strategy.</p> <p>Trowbridge is a principle location for growth within Wiltshire and has one of the highest indicative requirements for housing of any town in Wiltshire within the Plan period (2006-2026). However, as noted in the HSAP delivery of housing within Trowbridge is significantly below the indicative requirement. Due to the delay in the HSAP and the availability of land for development, there has been an over reliance on delivery from the Strategic site at Ashton Park. This has experienced significant delays to the extent that 1000 dwellings allocated for this site within the plan period are now expected to be delivered post 2026. It is therefore essential that sufficient allocations and number of dwellings are identified within Trowbridge within the HSAP to make up for this shortfall in delivery, and ensure that these can be delivered within the plan period.</p> <p>There is a discrepancy between the HSAP document and the Trowbridge Community Area Topic Paper in relation to the residual requirement for Trowbridge (between 1,220 and 2,020). Clarity is needed on which is the correct figure and the number of dwelling allocations should reflect this. However, it is also important that in identifying allocations and housing targets within these allocations, that these are seen in the context of the “minimum” housing requirement in the Core Strategy; the fact that the housing requirement will need to be reviewed shortly; and the Government’s objective to boost housing supply.</p> <p>It is also noted that the Council has included a windfall allowance to help meet the overall housing requirement. Windfalls are by definition not planned for, and inclusion of this element to help meet requirements does not amount to planning positively, as required by the NPPF. In this context, the Council should be looking to meet the full remaining requirement through planned allocations.</p> <p>H2.2 Land off the A363 at White Horse Business Park, Trowbridge</p> <p>The Council has undertaken a thorough review of available sites to inform the site selection process and this is considered robust. The process enables the most appropriate and sustainable sites to be identified.</p>				

	<p>Ordinarily, in accordance with the Council’s methodology, the site sifting process results in only sites assessed as being “more sustainable” through the Sustainability Appraisal being considered as preferred site allocations. However, because of the remaining residual need in Trowbridge “less sustainable” sites have also been considered. This is even before deductions have been made to site capacity from numbers considered in the SHLAA.</p> <p>The result in Trowbridge is the preferred allocations would provide a total of 800 dwellings (as proposed). 180 dwellings would come from a site (Southwick Court) which is considered to be ‘less sustainable’ (as assessed in the Councils SA). The allocations therefore fall well short of the required number of housing identified for Trowbridge (whichever residual figure is used).</p> <p>The inclusion of Land off the A363 at White Horse Business Park, Trowbridge as one of the preferred allocations is supported. As assessed by the Council, the site represents a sustainable and appropriate housing site, which will be able to deliver a large number of housing within the plan period. It is considered however, that the Council have vastly underestimated the amount of dwellings that could be delivered on this site.</p> <p>The site in total measures some 25.26ha. It is accepted that the whole site will not be available for development as, noted by the Council, there will need maintain a visual separation between North Bradley and Trowbridge, a need to retain hedgerows, and respect surrounding listed buildings. However, the proposed allocation of 150 dwellings is considered to be too low and would equate to a density of less than 6dw/ha. It is not clear how this very low figure has been reached.</p> <p>This clearly would not make the most efficient use of the site. As an identified sustainable site, the opportunity to maximise the amount of development (whilst respecting constraints, as discussed) should be embraced, to either avoid the need to allocate less sustainable sites or increase the overall allocation figures to help to achieve the indicative residual requirement for Trowbridge.</p> <p>The site clearly has capacity to achieve far greater numbers than the 150 currently allocated for the site. The site is available for development now, with a range of accesses into the site which would enable different parts of the site to be developed simultaneously to speed up delivery. Linden Homes are a bespoke national housebuilder and are an ideal development partner to ensure the Council’s housing requirements are deliverable and will look to develop this site in accordance with the Council’s housing need requirement.</p> <p>Linden Homes have already commenced studies to inform development of the site, meaning housing could be delivered on the site in the short term. Care would have to be taken to ensure the Grade II listed monuments in the burial ground of the former Baptist church and neighbouring farmhouse are respected, and existing hedgerows and trees are maintained. However, it is considered that the allocation could conceivably supply in excess of 300 dwellings.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To provide further information on the capacity of allocation H2.2</p>

Comment ID:	3075	Consultee Miss Emma Powell Land and Planning Manager	Agent Mr Tristan Dewhurst Senior Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Redrow Homes Person ID: 840359	Lichfields Person ID: 443671	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Paragraph 4.3-4.5; 4.6-4.27; Table 4.2 and 4.3	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 4.3-4.5; Tables 4.2 and 4.3</p> <p>This section of the Wiltshire Housing Site Allocations Plan (HSAP) identifies the areas where site allocations have been made. It suggests that the priority for housing land allocations is on higher tier settlements that have not yet met or contributed towards indicative levels of provision, which includes Trowbridge. We support a focus of the strategy on those community areas that have under-delivered. Read alongside the Site Selection Process Methodology (Topic Paper 2) and the Trowbridge Community Area Topic Paper, the Plan clearly excludes the whole of the Trowbridge Community Area Remainder from consideration, and no SHLAA sites were considered around any of the Large Villages. This approach is particularly inconsistent noting the proximity of proposed allocations to the Large Villages, notably North Bradley.</p> <p>Paragraph 4.5 and Table 4.3 indicate that housing site allocations were also made in at Large Villages in the Chippenham, Malmesbury, Warminster and Westbury Community Area Remainers. This is despite the indicative Core Strategy requirements being in some cases wholly met for these Community Area Remainers, suggesting further inconsistencies in the Council's approach.</p> <p>There is no objective reason to positively consider the role of the Chippenham CA remainder and the Large Villages around it and to discount the wider area around the Trowbridge where under delivery is a more significant problem.</p> <p>We object to the approach set out in the Plan, which is inconsistent and unjustified. The Plan should consider all available, deliverable and sustainable sites for development in the Trowbridge Community Area to ensure a flexible and deliverable response to the significant identified housing shortfall.</p> <p>A reliance on sites in proximity to the Ashton Park strategic allocation, notably those contingent on significant infrastructure works to be able to come forward, risks compounding the delays which have caused the housing shortfall in the Trowbridge Community Area. As has been noted in the HSAP, the housing requirements for each settlement are indicative as is the disaggregation and should not therefore preclude consideration of sites in the Large Villages, including Southwick. The disaggregation is not a set bar and to not consider the wider area is inappropriate. This has led to the proposed allocation of some sites with more significant constraints such as landscape and heritage.</p> <p>The exclusion of Southwick and the Trowbridge Community Area Remainder from consideration in identifying and assessing sites for allocation is therefore not justified, and we object to the Plan as currently prepared.</p> <p>Site Selection Process – 4.6-4.27</p> <p>As highlighted above, our client's site has not been considered through the HSAP allocations due to the Site Selection Process Methodology. This is due to the approach at the first stage which defines the 'Area of Search' and excludes the Trowbridge Community Area Remainder from consideration. As stressed, our view is that the indicative divide between Trowbridge and the Remainder Area is not justified in light of the significant and strategic housing shortfall at one of the Principal Settlements in Wiltshire. The Council cannot rely on the requirements being indicative for each community area and then rely on the subdivision between town and the remainder as an absolute. There must be flexibility both ways.</p>				

Had sites from the whole of the Trowbridge Community Area been considered within the 'Area of Search', then our client's site at Blind Lane, Southwick would have been formally considered as a prospective location for housing. Considering the characteristics and merits of the site against the site selection criteria, we consider that the site clearly presents itself as an available, sustainable and deliverable location for development:

The site does not meet any of the 'exclusory criteria' set out at Stage 2a of the process:

It is not an existing allocation, commitment, and is situated adjacent to a defined settlement boundary.

The site is not fully or partly within the settlement boundary.

The site is not fully or partly within any of the specified environmental designations (SAC, SPA, Ramsar sites, National Nature Reserve, Ancient woodland, SSSI).

The site is not within the Green Belt.

The developable extent of the site is within Flood zone 1.

The site is not fully or partly within any internationally or nationally designated heritage assets.

Stage 2B indicates that the SHLAA sites at some Large Villages and Local Service Centres will be removed because previous and committed development already meets those villages' local needs, or they are in an AONB and alternatives are available, or a Neighbourhood Plan for the settlement has already reached an advanced stage.

The latter two criteria do not apply to our site in this instance. It is not located in an AONB, and the Neighbourhood Plan is at a very early stage of preparation. Whilst the indicative requirement for the Trowbridge Community Area Remainder has now been met, the significant identified shortfall of housing in Trowbridge itself, coupled with the environmental and development constraints at the town, mean that this approach is untenable in the Trowbridge Community Area. The methodology should therefore allow consideration of sites at the Large Villages close to Trowbridge.

Stage 3 comprises the Sustainability Appraisal of the sites proposed. There is an extensive evidence base in relation to our client's site with a suite of supporting technical reports. As part of the planning application (16/12279/OUT) it was concluded that there were no technical constraints to site delivery. The site is a more appropriate option than a number of the proposed site allocations in Trowbridge some of which have clear development constraints.

Stage 4a takes the assessment of prospective sites further. It indicates that more detailed proposals for the sites passing stages 1-3 were prepared and consulted upon, with a further assessment of the relative sustainability, benefits and opportunities of each site. Our client's site at Southwick has been shown to be a sustainable, deliverable and suitable location for development. The outline application submitted on the site presents a masterplan which demonstrates that residential development can be accommodated within a sympathetic scheme which protects the ecological and environmental assets of the site. The site's sustainable location, with close access to the local primary school and public transport links, also counts in favour of the site. There are also substantial additional benefits to the site, which it has been demonstrated could deliver a policy compliant contribution to affordable housing, new public open space, a contribution towards a new foot link in Southwick and an improved landscape interface between the village and the countryside.

The site therefore, represents a sustainable pattern of development and has the opportunity to meet housing need within the Trowbridge Community Area and to deliver local benefits for the community in line with local policy objectives.

Paragraph 4.3-4.5; Tables 4.2 and 4.3

A fundamental review to the Site Selection Process Methodology is required to ensure that the significant and strategic shortfall of housing in the Trowbridge Community Area gives full consideration to all opportunities across the Community Area. This will ensure that the Plan is able to consider and allocate a range of sites which are available, sustainable and deliverable, noting the unanticipated constraints which have already been identified on many sites at the edge of Trowbridge.

Site Selection Process – 4.6-4.27

The approach to the housing methodology at the initial stages must include the whole Trowbridge Community Area to enable all sustainable, available and deliverable sites to be considered through the HSAP. Our client's site presents a clear opportunity to further meet the housing shortfall in the Trowbridge Community Area.

On behalf of our client, Redrow Homes (South West) Ltd, please find enclosed representations to the Regulation 19 Consultation on the Wiltshire Housing site Allocations Plan (HSAP) Pre-Submission Document.

We set out below a summary of the enclosed representations:

The HSAP must make clear that where there are significant housing shortfalls identified that the LPA will review the spatial strategy flexibly. For the Trowbridge Community Area, where there is a significant housing shortfall, this will require consideration of sites across the whole community area to ensure that the Plan considers all sustainable, available and deliverable sites to meet this shortfall in the short-to-medium term.

The extent of the housing shortfall identified is significant and presents a risk to the strategic role and function of Trowbridge as one of the Principal settlements in the District. Furthermore, it should be noted that the Wiltshire Core Strategy sets out the overall housing requirement for Trowbridge to be met as a minimum. The HSAP should therefore seek to allocate sites to meet the full identified housing shortfall in Trowbridge. The HSAP must respond to the joint SHMA update by Wiltshire and Swindon to ensure that it allocates housing to meet the full objectively assessed housing need in the District.

We object to the exclusion of the Trowbridge Community Area Remainder from consideration in the site selection process to meet the significant identified housing shortfall. Given the acknowledged environmental and infrastructure constraints around the town it is imperative that the LPA fully considers all options in the Community Area. The Council cannot apply flexibility to the target Core Strategy Community Area housing requirements and then treat the disaggregation between the Principal Town and the remainder area as a fix.

The HSAP elects to allocate development to Large Villages in other locations, including adjacent to North Bradley and also where the indicative 'Remainder' requirement is met. To exclude Large Villages around Trowbridge, including Southwick, to address some of the housing need is untenable in light of the significant housing shortfall.

The site allocations proposed in Trowbridge are subject to constraints which have serious potential to delay delivery or otherwise limit development capacity e.g. all sites will be affected by Habitat Regulations Assessments and the requirement to implement the Trowbridge Recreation Management Mitigation Strategy which is yet to be agreed. Some sites are noted to require significant transport and social infrastructure to support development, or else have landscape and heritage sensitivities. Noting these factors, we consider there is a real risk of further delay to delivering the housing in Trowbridge. This compounds the decision not to meet the full identified housing shortfall.

There is a clear need to make further housing allocations within the Trowbridge Community Area with the contribution from the whole Community Area given detailed consideration.

Our client's site at Blind Lane, Southwick, presents a logical and sustainable opportunity to meet this need. The recent outline planning application demonstrated that there are no technical constraints to delivering housing within the short-to-medium term. We have enclosed a site location plan (reference R0416_05A Rev A) and the proposed site masterplan (reference R0416_06 Rev G) to illustrate the opportunity this site presents to accommodate part of Trowbridge's housing requirement.

There are numerous merits to allocating this site including:

The site is not subject to any international, national or local environmental designations, including AONB, biodiversity and Green Belt.

The site is defensible and enclosed and a logical extension of Southwick, without risking coalescence with Trowbridge.

The site is in a sustainable location due to the proximity of key local services, its proximity to the centre of Trowbridge and the availability of public transport links.

The site is majority Flood Zone 1, and therefore sequentially preferable as a location for development.

Suitable vehicular and pedestrian access can be provided to and from Blind Lane, and transport assessments have confirmed that the proposals will not give rise to unacceptable traffic impacts.

The site is not in the context of any designated heritage assets or landscapes, and it has been shown that the site could provide an improved interface for Southwick with the countryside.

Following detailed surveys, the ecological interests of the site have been identified and a masterplan proposed which the Council's ecology officer confirms will be unlikely to have adverse impacts on biodiversity interests.

The majority of the mature trees and hedgerows on the site can be retained and incorporated into the scheme, with landscaping and replacement planting to compensate where a small amount of hedgerow is removed for the site access.

A list of the documents upon which the planning application was determined has been included at the end of this letter. These are available on Wiltshire Council's online register, and form an up-to-date evidence base which demonstrates that the site is technically deliverable and appropriate. We reserve the right to refer to these documents to support our participation in the Examination of this Plan.

	<p>We urge the Council to review this information in light of our comments and concerns regarding the HSAP strategy and proposed allocations, and to positively allocate our clients site for residential development to support the delivery of housing in the Trowbridge Community Area. We trust that the enclosed representations will be considered in detail. Since this is the first published full iteration of the Wiltshire Housing Site Allocations Plan, we would urge the local authority to reconsider the strategy proposed within the plan, and to favourably consider our client's site for allocation to meet Trowbridge's housing needs in the current plan period.</p>
Attached files (Please see Objective)	4740492 / 4740490 / 4740491
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To enable a detailed review of these representations and to assist the Inspector's thorough examination of the draft plan.

Comment ID:	3076	Consultee Miss Emma Powell Land and Planning Manager	Agent Mr Tristan Dewhurst Senior Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Redrow Homes Person ID: 840359	Lichfields Person ID: 443671	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		7.8-7.9		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraphs 7.8-7.9 Housing Land Supply</p> <p>We have reviewed the Housing Land Supply Topic Paper which supports this consultation. We note that whilst the Topic Paper includes a summary position of the housing land supply position, accounting for the proposed allocations within the Plan, it does not include a detailed housing trajectory assessing the delivery of the proposal allocations. This prevents any meaningful scrutiny of the projected land supply position. We request that the LPA publishes their full housing trajectory in order to enable a transparent review of the strategy underpinning the HSAP. On behalf of our client, Redrow Homes (South West) Ltd, please find enclosed representations to the Regulation 19 Consultation on the Wiltshire Housing site Allocations Plan (HSAP) Pre-Submission Document.</p> <p>We set out below a summary of the enclosed representations:</p> <p>The HSAP must make clear that where there are significant housing shortfalls identified that the LPA will review the spatial strategy flexibly. For the Trowbridge Community Area, where there is a significant housing shortfall, this will require consideration of sites across the whole community area to ensure that the Plan considers all sustainable, available and deliverable sites to meet this shortfall in the short-to- medium term.</p> <p>The extent of the housing shortfall identified is significant and presents a risk to the strategic role and function of Trowbridge as one of the Principal settlements in the District. Furthermore, it should be noted that the Wiltshire Core Strategy sets out the overall housing requirement for Trowbridge to be met as a minimum. The HSAP should therefore seek to allocate sites to meet the full identified housing shortfall in Trowbridge. The HSAP must respond to the joint SHMA update by Wiltshire and Swindon to ensure that it allocates housing to meet the full objectively assessed housing need in the District.</p> <p>We object to the exclusion of the Trowbridge Community Area Remainder from consideration in the site selection process to meet the significant identified housing shortfall. Given the acknowledged environmental and infrastructure constraints around the town it is imperative that the LPA fully considers all options in the Community Area. The Council cannot apply flexibility to the target Core Strategy Community Area housing requirements and then treat the disaggregation between the Principal Town and the remainder area as a fix.</p> <p>The HSAP elects to allocate development to Large Villages in other locations, including adjacent to North Bradley and also where the indicative 'Remainder' requirement is met. To exclude Large Villages around Trowbridge, including Southwick, to address some of the housing need is untenable in light of the significant housing shortfall.</p> <p>The site allocations proposed in Trowbridge are subject to constraints which have serious potential to delay delivery or otherwise limit development capacity e.g. all sites will be affected by Habitat Regulations Assessments and the requirement to implement the Trowbridge Recreation Management Mitigation Strategy which is yet to be agreed. Some sites are noted to require significant transport and social infrastructure to support development, or else have landscape and heritage sensitivities. Noting these factors, we consider there is a real risk of further delay to delivering the housing in Trowbridge. This compounds the decision not to meet the full identified housing shortfall.</p> <p>There is a clear need to make further housing allocations within the Trowbridge Community Area with the contribution from the whole Community Area given detailed consideration.</p>				

	<p>Our client's site at Blind Lane, Southwick, presents a logical and sustainable opportunity to meet this need. The recent outline planning application demonstrated that there are no technical constraints to delivering housing within the short-to-medium term. We have enclosed a site location plan (reference R0416_05A Rev A) and the proposed site masterplan (reference R0416_06 Rev G) to illustrate the opportunity this site presents to accommodate part of Trowbridge's housing requirement.</p> <p>There are numerous merits to allocating this site including:</p> <p>The site is not subject to any international, national or local environmental designations, including AONB, biodiversity and Green Belt.</p> <p>The site is defensible and enclosed and a logical extension of Southwick, without risking coalescence with Trowbridge.</p> <p>The site is in a sustainable location due to the proximity of key local services, its proximity to the centre of Trowbridge and the availability of public transport links.</p> <p>The site is majority Flood Zone 1, and therefore sequentially preferable as a location for development.</p> <p>Suitable vehicular and pedestrian access can be provided to and from Blind Lane, and transport assessments have confirmed that the proposals will not give rise to unacceptable traffic impacts.</p> <p>The site is not in the context of any designated heritage assets or landscapes, and it has been shown that the site could provide an improved interface for Southwick with the countryside.</p> <p>Following detailed surveys, the ecological interests of the site have been identified and a masterplan proposed which the Council's ecology officer confirms will be unlikely to have adverse impacts on biodiversity interests.</p> <p>The majority of the mature trees and hedgerows on the site can be retained and incorporated into the scheme, with landscaping and replacement planting to compensate where a small amount of hedgerow is removed for the site access.</p> <p>A list of the documents upon which the planning application was determined has been included at the end of this letter. These are available on Wiltshire Council's online register, and form an up-to-date evidence base which demonstrates that the site is technically deliverable and appropriate. We reserve the right to refer to these documents to support our participation in the Examination of this Plan.</p> <p>We urge the Council to review this information in light of our comments and concerns regarding the HSAP strategy and proposed allocations, and to positively allocate our clients site for residential development to support the delivery of housing in the Trowbridge Community Area.</p> <p>We trust that the enclosed representations will be considered in detail. Since this is the first published full iteration of the Wiltshire Housing Site Allocations Plan, we would urge the local authority to reconsider the strategy proposed within the plan, and to favourably consider our client's site for allocation to meet Trowbridge's housing needs in the current plan period.</p>
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H2 (North and West Wiltshire Housing Market Area), Policy H2.1 (Elm Grove Farm); H2.2 Land of the A363 a White Horse Business Park; H2.3 Elizabeth Way; H2.4 Church Lane; H2.5 Upper Studley; H2.6 Southwick Court</p> <p>We set out below our client's strong concerns about the approach to the housing strategy and proposed allocations in Trowbridge.</p> <p>Meeting the identified housing shortfall</p> <p>Though the allocations proposed will provide up to 800 units for the Trowbridge Community Area, the Plan notes that there is a significant housing shortfall of 1,220 units across the town (see paragraph 4.52).</p> <p>The timescales for development at Ashton Park still remain uncertain and subject to conjecture. There remains a risk that delivery will slip further during the plan period. The identified shortfall will therefore not be remedied unless the Council robustly and fundamentally reviews all site opportunities to sustainably deliver housing across the Trowbridge Community Area.</p> <p>Trowbridge is identified as one of the Principal Settlements in the Core Strategy. This is the primary settlement tier, with only two other settlements identified (Chippenham and Salisbury). The town has a critical strategic role as a primary focus for employment, residential and other related development. Core Policy 1 in the Core Strategy seeks to safeguard and enhance their strategic roles as employment and service centres. The proposition within the HSAP to allocate only 800 units, rather than for the identified shortfall in full, does not support the objectives of the Core Strategy and will undermine the role and function of Trowbridge.</p> <p>We consider therefore that there is an urgent need for additional sites to meet the full identified housing shortfall in the Trowbridge Community Area.</p> <p>Deliverability and Risk of Delay</p> <p>Noting the unanticipated delays to bringing forward the Ashton Park strategic site, there is a clear risk to the proposed concentration of new allocations at the south of Trowbridge.</p> <p>A key objective of the HSAP is to ensure an adequate supply of housing land to realise the spatial strategy set out in the Wiltshire Core Strategy and deliver sites quickly. At Trowbridge, it is acknowledged that the Ashton Park strategic site will not deliver the level of housing originally projected within the Core Strategy. The two significant factors causing the ongoing delays are the issues relating to Habitats Regulations Assessment (HRA) and protected bat populations and the requirement to provide significant new infrastructure to support the new development. The focus of the HSAP must be on allocating suitable and sustainable sites which are both available and deliverable, in order to secure a credible short-to-medium term supply of housing in Trowbridge whilst the strategic sites are delayed in coming forward.</p> <p>Paragraph 5.44 notes that there are significant constraints limiting the choice of available sites across Trowbridge. These constraints include ecological designations and habitats (notably the populations of bats associated with the Bradford-on-Avon SAC), landscape and Green Belt designations and highways and service infrastructure limitations. The decision of the Council to allocate majority of the new sites at the south of the town, with much adjacent to the Ashton Park strategic site, risks exposing the new allocations to the same development delays and constraints which have caused the housing shortfall in Trowbridge.</p>				

In particular, we note that the LPA considers each proposed allocation has the potential to be used by Betchstein bats associated with the Bradford-on-Avon SAC. The proposed allocations are not supported by any site surveys which seek to quantify or assess the potential for these sites to affect the Bradford-on-Avon SAC.

The HRA HSAP suggests that the Trowbridge Recreation Management Mitigation Strategy will need to be produced and implemented before development comes forward to address 'residual uncertainty, particularly due to effects of growth at a landscape scale' (Wiltshire Housing Site Allocations Plan: Habitat Regulations Assessment June 2017). The document suggests that this is currently being prepared, with discussions ongoing with Natural England, though there is no clear timescale for when this will be completed, what works will need to be implemented prior to development coming forward. The potential for this to adversely impact timescales and delivery is therefore unknown. It is imperative that such work is prepared and agreed now as part of the HSAP and fully tested in agreeing the proposed site allocations. To leave this until after the Plan is agreed will provide sufficient uncertainty and potentially continue to exacerbate the lack of recent housing delivery.

The proposed allocation at Elm Grove Farm (ref. H2.1) is also contingent on securing and implementing significant infrastructure works in the form of upgrades to Drynham Lane and a connection to the A363. The site is also required to accommodate a new primary school to serve the local area and provide additional school place capacity. These are significant infrastructure requirements which have the potential to delay delivery. This risks a further delay to a proposed site allocation, which contrary to the purpose of allocating sites to meet a short-to-medium term housing shortfall at Trowbridge.

Impact on Capacity

Until such time as the strategy is finalised, it is unclear how the requirements of the Trowbridge Recreation Management Mitigation Strategy might impact the capacity of these sites to accommodate the quantum of development proposed in these allocations. Any reduction in the sites' developable capacity will further reduce the capacity for the site to meet the unmet housing requirement in Trowbridge. It is imperative that the mitigation strategy is prepared alongside the plan so that the impacts are known and in order to avoid the same problems as experienced with Ashton Park.

Other sites which have been identified have potential for landscape and heritage impacts, due to their proximity to the setting of designated heritage assets and their exposure to the rural hinterland around Trowbridge. These issues do not inherently preclude development at these locations, though they underscore the local sensitivities of the site, which has further potential to delay delivery or constrain site capacity as acceptable masterplan approaches are agreed.

For example, site allocation H2.6 (Southwick Court) is considered within the Landscape Assessment supporting this consultation as being an 'attractive' and 'integral part of the settlement setting'. It further concludes that the site has a 'low' capacity to accommodate change with a 'high' overall magnitude of effect on landscape character. This does not account for impact upon the setting of Southwick Court, as a significant Grade II* listed manor house.

We question whether these sites necessarily present the best option to accommodate new development. Our client's site at Blind Lane, Southwick, for example, has been demonstrated to be of a low sensitivity considering landscape, ecology and heritage matters. Had the site search included the wider Trowbridge Community Area, a greater choice of sites would have been available for consideration, including our client's site at Blind Lane, Southwick.

The site at Blind Lane Southwick (see plan attached reference: R0416_05 Rev A and illustrative masterplan reference: R0416_06 Rev G) presents an available, deliverable and sustainable location to help meet the housing need in the Trowbridge Community Area. The outline planning application (reference: 16/12279/OUT) submitted in December 2016 has demonstrated that the site is not environmentally sensitive, and that there are no technical constraints which would prohibit development in the short term.

It is worth summarising the merits of this site in more detail:

Our client's site is not subject to any international, national or local environmental designations.

The site is located at the edge of the settlement in Southwick, adjoining existing residences along its northern boundaries. The southern boundaries are clearly defensible with hedgerows and a watercourse which provides a natural physical containment to the site. It is situated to the south-east of the village, and would therefore preserve Southwick's separate identity and not contribute to the coalescence of Southwick with Trowbridge.

The site is in a sustainable location, with access to key local services including a primary school a short walk from the site, local convenience store, two churches, community hall and other local retail. There are public transport links between Southwick and the centre of Trowbridge,

which is situated 2.3 miles from the site. Wiltshire Council's highways officers confirmed their view that the site represented a 'reasonably sustainable' location in transport terms when responding to the proposals through our outline planning application.

The site falls outside of the Green Belt, which places a significant constraint upon development to the north and north-west of Trowbridge. It therefore presents an available, sustainable and deliverable site for development ahead of requiring the release of any Green Belt land (a review of which is referenced in the HSAP-Paragraph 4.58).

The majority of the site falls within Flood Zone 1, and is therefore sequentially preferable from a Flood Risk perspective. The Flood Risk Assessment and associated drainage details submitted with the outline application have shown that the site can be developed to sustainably manage foul and surface water drainage without increasing risk of flooding on the site or elsewhere. Wiltshire Council's drainage team confirmed that they had only comments on the application, subject to the application of conditions.

The application site is not on or within the vicinity of any local, national or international biodiversity or geophysical designations. The surveys undertaken to support the application identified the habitats and species of interest on the site, and shown that the site can be developed whilst protecting and enhancing protected and important species on the site. Wiltshire Council's ecology officer has confirmed that the proposals identified all sensitive ecological receptors and that, subject to appropriate conditions, sufficient mitigation was included so that harmful impacts on protected sites and species would be very unlikely. This is significant in the context of the known ecological and HRA constraints around Trowbridge. There are no Habitat Regulation issues regarding its potential development.

The site falls outside of any designated landscape constraints, including any AONBs. The site is otherwise level and visually contained, with a low landscape value and sensitivity. Wiltshire Council's landscape officer commented on the outline application, indicating that the proposals would not be uncharacteristic to the area and that the scheme would provide an improved interface with the surrounding countryside.

Suitable access to and from the site can be provided, including pedestrian, cycling and vehicular links, as demonstrated through the application. The transport assessment submitted with the application also confirmed that there would be no severe or unacceptable traffic impacts arising from the proposed development. These points were agreed with Wiltshire Council's highways officer, as well as agreeing that the site constituted a reasonably sustainable location for development in transport terms.

There are no designated heritage assets within the site, including Listed Buildings, Conservation Areas or Scheduled Ancient Monuments. The application site is also not located in the near setting of any designated heritage assets, and can therefore be developed without harm to the historic environment. Additionally, survey work undertaken as part of the application confirmed that there is a very low potential for significant archaeological remains at the site.

The site could be developed without requiring significant removal of mature trees or hedgerows. A small amount of hedgerow would need to be removed or reduced to create an appropriate access, though compensatory planting could mitigate the limited impacts that this would have.

The impacts of development at this site have therefore been fully considered and evidence base submitted to support this planning application demonstrates that there are no technical constraints prohibiting the site from accommodating residential development. The draft heads of terms, which have been agreed in principle, have shown that the site-specific impacts of the development can be appropriately mitigated through policy compliant on-site contributions for affordable housing and public open space, as well as providing contributions to off-site improvements and infrastructure. The sole reason for refusal given on the application relates to the principle of development and the development plan strategy.

Policy H2 (North and West Wiltshire Housing Market Area), Policy H2.1 (Elm Grove Farm); H2.2 Land of the A363 a White Horse Business Park; H2.3 Elizabeth Way; H2.4 Church Lane; H2.5 Upper Studley; H2.6 Southwick Court

The Council must fundamentally revisit the site selection process to ensure that the outcomes identify sustainable, available and deliverable sites to provide a flexible approach to meeting the housing need of the Trowbridge Community Area. It is essential to ensure that there is an adequate supply of housing to support the growth of the town as one of the Principal Settlements in Wiltshire. The full identified housing shortfall must therefore be met in full, and it will be necessary to consider additional sites for allocation.

The site selection process methodology must, from the outset, consider the overall Trowbridge Community Area to maximise opportunities for sustainable development, and not exclusively consider the constrained and sensitive perimeters of Trowbridge town. Priority for new allocations should be given to sites which are accessible and sustainably located, and which have been proven to be available, deliverable and not technically constrained.

We urge the Council to consider our client's site favourably and allocate it for residential development, in order to ensure that there is a sufficient choice of housing sites to address local affordable housing needs and to ensure sufficient flexibility to the plan, and to provide certainty of delivery.

On behalf of our client, Redrow Homes (South West) Ltd, please find enclosed representations to the Regulation 19 Consultation on the Wiltshire Housing site Allocations Plan (HSAP) Pre-Submission Document.

We set out below a summary of the enclosed representations:

The HSAP must make clear that where there are significant housing shortfalls identified that the LPA will review the spatial strategy flexibly. For the Trowbridge Community Area, where there is a significant housing shortfall, this will require consideration of sites across the whole community area to ensure that the Plan considers all sustainable, available and deliverable sites to meet this shortfall in the short-to- medium term.

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We object to the exclusion of the Trowbridge Community Area Remainder from consideration in the site selection process to meet the significant identified housing shortfall. Given the acknowledged environmental and infrastructure constraints around the town it is imperative that the LPA fully considers all options in the Community Area. The Council cannot apply flexibility to the target Core Strategy Community Area housing requirements and then treat the disaggregation between the Principal Town and the remainder area as a fix.

The HSAP elects to allocate development to Large Villages in other locations, including adjacent to North Bradley and also where the indicative 'Remainder' requirement is met. To exclude Large Villages around Trowbridge, including Southwick, to address some of the housing need is untenable in light of the significant housing shortfall.

The site allocations proposed in Trowbridge are subject to constraints which have serious potential to delay delivery or otherwise limit development capacity e.g. all sites will be affected by Habitat Regulations Assessments and the requirement to implement the Trowbridge Recreation Management Mitigation Strategy which is yet to be agreed. Some sites are noted to require significant transport and social infrastructure to support development, or else have landscape and heritage sensitivities. Noting these factors, we consider there is a real risk of further delay to delivering the housing in Trowbridge. This compounds the decision not to meet the full identified housing shortfall.

There is a clear need to make further housing allocations within the Trowbridge Community Area with the contribution from the whole Community Area given detailed consideration.

Our client's site at Blind Lane, Southwick, presents a logical and sustainable opportunity to meet this need. The recent outline planning application demonstrated that there are no technical constraints to delivering housing within the short-to-medium term. We have enclosed a site location plan (reference R0416_05A Rev A) and the proposed site masterplan (reference R0416_06 Rev G) to illustrate the opportunity this site presents to accommodate part of Trowbridge's housing requirement.

There are numerous merits to allocating this site including:

The site is not subject to any international, national or local environmental designations, including AONB, biodiversity and Green Belt.

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The site is in a sustainable location due to the proximity of key local services, its proximity to the centre of Trowbridge and the availability of public transport links.

The site is majority Flood Zone 1, and therefore sequentially preferable as a location for development.

Suitable vehicular and pedestrian access can be provided to and from Blind Lane, and transport assessments have confirmed that the proposals will not give rise to unacceptable traffic impacts.

The site is not in the context of any designated heritage assets or landscapes, and it has been shown that the site could provide an improved interface for Southwick with the countryside.

Following detailed surveys, the ecological interests of the site have been identified and a masterplan proposed which the Council's ecology officer confirms will be unlikely to have adverse impacts on biodiversity interests.

	<p>The majority of the mature trees and hedgerows on the site can be retained and incorporated into the scheme, with landscaping and replacement planting to compensate where a small amount of hedgerow is removed for the site access.</p> <p>A list of the documents upon which the planning application was determined has been included at the end of this letter. These are available on Wiltshire Council's online register, and form an up-to-date evidence base which demonstrates that the site is technically deliverable and appropriate. We reserve the right to refer to these documents to support our participation in the Examination of this Plan.</p> <p>We urge the Council to review this information in light of our comments and concerns regarding the HSAP strategy and proposed allocations, and to positively allocate our clients site for residential development to support the delivery of housing in the Trowbridge Community Area.</p> <p>We trust that the enclosed representations will be considered in detail. Since this is the first published full iteration of the Wiltshire Housing Site Allocations Plan, we would urge the local authority to reconsider the strategy proposed within the plan, and to favourably consider our client's site for allocation to meet Trowbridge's housing needs in the current plan period.</p>
<p>Attached files (Please see Objective)</p>	<p>4740492 / 4740490 / 4740491</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To enable a detailed review of these representations and to assist the Inspector's thorough examination of the draft plan.</p>

Comment ID:	3078	Consultee Miss Emma Powell Land and Planning Manager	Agent Mr Tristan Dewhurst Senior Planner	Do you consider the draft WHSAP is legally compliant?	No
		Redrow Homes Person ID: 840359	Lichfields Person ID: 443671	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Positively prepared Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Sustainability Appraisal, TEP and Trowbridge / H2.6				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Our client has concerns regarding the robustness of the Sustainability Appraisal supporting the Site Allocations Document and in particular its methodology in assessing the proposed plan strategy and whether it has considered all reasonable alternatives for the accommodation of housing growth around the district.</p> <p>The SA appears to only assess the selected options for growth shortlisted at the outset by the Council. As a result, it does not consider the reasonable alternative of providing more growth within the Trowbridge remainder area to assist in addressing the local need for housing in the community area. The SA should provide a transparent assessment of the Council's strategy choice alongside the other reasonable alternatives and assess the environmental effects of each. In addition, the impact of not achieving the housing growth anticipated by the Core Strategy at Trowbridge (under delivery by 1,220 dwellings) and the subsequent impacts on affordability and a lack of housing choice should also have been considered so that the socio economic and environmental effects can be fully understood. The SA is therefore deficient in its consideration of reasonable alternatives.</p> <p>There are also concerns over the robustness of how the SA has interpreted the evidence base in assessing how the sites perform against the various SA objectives. For example, site allocation H2.6 (Southwick Court) is considered within the TEP Landscape Assessment as being an 'attractive' and 'integral part of the settlement setting'. The TEP assessment concludes that the allocation will have a 'high' overall magnitude of effect on landscape character and has a 'low' capacity for change following the implementation of mitigation measures. This is then translated as only a medium adverse effect within the SA.</p> <p>According to the methodology of the TEP landscape report the site allocation cannot have a greater impact in terms of the magnitude of effect which is 'high' or have a lower capacity to accept change. As a result, it cannot follow that the SA can determine the landscape effects as only a moderate adverse impact. The effects cannot be fully mitigated i.e. there is low potential to achieve this. The effects should therefore be major adverse according to SA methodology (SA Table 2.3). Mitigation is not just problematic it is not possible to mitigate the effect and there would be significant residual landscape effects.</p> <p>As a result we are concerned that there is a lack of consistency in the selection of the proposed sites at Trowbridge and the method in which they have been assessed through the community area topic papers and the associated SA.</p> <p>The SA needs a thorough review to consider the policy choices of the Council in preparing this plan and the reasonable alternatives for considering how the required housing growth can be accommodated. It also needs to assess in greater detail the proposed allocations around Trowbridge including their deliverability particularly with regard to the HRA, landscape and heritage issues.</p> <p>The SA should also be updated to assess additional sites within the wider Trowbridge remainder area so that all the available options in the community area to achieve the CS housing target are considered transparently rather than the remainder area being excluded at the outset of the process</p> <p>On behalf of our client, Redrow Homes (South West) Ltd, please find enclosed representations to the Regulation 19 Consultation on the Wiltshire Housing site Allocations Plan (HSAP) Pre-Submission Document.</p>				

We set out below a summary of the enclosed representations:

The HSAP must make clear that where there are significant housing shortfalls identified that the LPA will review the spatial strategy flexibly. For the Trowbridge Community Area, where there is a significant housing shortfall, this will require consideration of sites across the whole community area to ensure that the Plan considers all sustainable, available and deliverable sites to meet this shortfall in the short-to- medium term.

The extent of the housing shortfall identified is significant and presents a risk to the strategic role and function of Trowbridge as one of the Principal settlements in the District. Furthermore, it should be noted that the Wiltshire Core Strategy sets out the overall housing requirement for Trowbridge to be met as a minimum. The HSAP should therefore seek to allocate sites to meet the full identified housing shortfall in Trowbridge. The HSAP must respond to the joint SHMA update by Wiltshire and Swindon to ensure that it allocates housing to meet the full objectively assessed housing need in the District.

We object to the exclusion of the Trowbridge Community Area Remainder from consideration in the site selection process to meet the significant identified housing shortfall. Given the acknowledged environmental and infrastructure constraints around the town it is imperative that the LPA fully considers all options in the Community Area. The Council cannot apply flexibility to the target Core Strategy Community Area housing requirements and then treat the disaggregation between the Principal Town and the remainder area as a fix.

The HSAP elects to allocate development to Large Villages in other locations, including adjacent to North Bradley and also where the indicative 'Remainder' requirement is met. To exclude Large Villages around Trowbridge, including Southwick, to address some of the housing need is untenable in light of the significant housing shortfall.

The site allocations proposed in Trowbridge are subject to constraints which have serious potential to delay delivery or otherwise limit development capacity e.g. all sites will be affected by Habitat Regulations Assessments and the requirement to implement the Trowbridge Recreation Management Mitigation Strategy which is yet to be agreed. Some sites are noted to require significant transport and social infrastructure to support development, or else have landscape and heritage sensitivities. Noting these factors, we consider there is a real risk of further delay to delivering the housing in Trowbridge. This compounds the decision not to meet the full identified housing shortfall.

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Our client's site at Blind Lane, Southwick, presents a logical and sustainable opportunity to meet this need. The recent outline planning application demonstrated that there are no technical constraints to delivering housing within the short-to-medium term. We have enclosed a site location plan (reference R0416_05A Rev A) and the proposed site masterplan (reference R0416_06 Rev G) to illustrate the opportunity this site presents to accommodate part of Trowbridge's housing requirement.

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The site is not in the context of any designated heritage assets or landscapes, and it has been shown that the site could provide an improved interface for Southwick with the countryside.

Following detailed surveys, the ecological interests of the site have been identified and a masterplan proposed which the Council's ecology officer confirms will be unlikely to have adverse impacts on biodiversity interests.

The majority of the mature trees and hedgerows on the site can be retained and incorporated into the scheme, with landscaping and replacement planting to compensate where a small amount of hedgerow is removed for the site access.

A list of the documents upon which the planning application was determined has been included at the end of this letter. These are available on Wiltshire Council's online register, and form an up-to-date evidence base which demonstrates that the site is technically deliverable and appropriate. We reserve the right to refer to these documents to support our participation in the Examination of this Plan.

	<p>We urge the Council to review this information in light of our comments and concerns regarding the HSAP strategy and proposed allocations, and to positively allocate our clients site for residential development to support the delivery of housing in the Trowbridge Community Area. We trust that the enclosed representations will be considered in detail. Since this is the first published full iteration of the Wiltshire Housing Site Allocations Plan, we would urge the local authority to reconsider the strategy proposed within the plan, and to favourably consider our client's site for allocation to meet Trowbridge's housing needs in the current plan period.</p>
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If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To enable a detailed review of these representations and to assist the Inspector's thorough examination of the draft plan.

Comment ID:	3079	Consultee Miss Emma Powell Land and Planning Manager	Agent Mr Tristan Dewhurst Senior Planner	Do you consider the draft WHSAP is legally compliant?	Yes
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To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Paragraphs 2.3; 2.16-2.18; 2.21-23		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 2.13 Paragraph 2.13 sets out the overall minimum housing requirements for each of the Housing Market Areas in Wiltshire. Including the homes proposed West of Swindon (see Core Policy 2 of the Core Strategy) this totals a minimum housing requirement of 42,000 homes. This figure is based upon the Strategic Housing Market Assessment (SHMA) (December 2011). Wiltshire Council has now jointly reviewed its SHMA with Swindon Borough Council. Though at the time of writing this has not been published for review, it is understood this will happen in the coming months. The revised SHMA indicates an uplift in the housing requirement across Wiltshire, and the committee report to the June meeting of the Joint Strategic Economic Committee indicated that a further review could take place to respond to the Government's proposed standardised housing need methodology (which has now been published for consultation). The housing requirement given within the Core Strategy cannot, therefore, be considered to be the most up-to-date evidence. It is incumbent on the LPA to ensure that the HSAP responds to the latest evidence to ensure that it is allocating land to meet the full objectively assessed housing needs of the District. Other local authorities such as Mendip are having due regard to such new evidence and are updating their Part 2 plan to respond to such changes and this should be the approach in Wiltshire.</p> <p>Paragraphs 2.16-2.18 The Council states that the focus of the HSAP will be to allocate sites for housing in areas where there has been an undersupply of housing against the targets in the Core Strategy which we support. This is particularly pertinent to Trowbridge (as noted later in the Plan and within the Trowbridge Community Topic Paper) as there has been a significant shortfall of housing in this Community Area. This amounts to a total of 1,220 units. This problem is exacerbated given that Trowbridge is one of Wiltshire's Principal Settlements where major housing growth was anticipated in the Core Strategy but it stands as the worst performing Community Area across the district against its indicative requirement (Table 4.10). The HSAP states that the disaggregated requirements for each settlement are indicative. However, where the projected undersupply of housing is as substantial as has been projected for Trowbridge, it is incumbent on the Council to take significant action in reviewing and addressing the shortcomings of the spatial strategy within the HSAP. Unfortunately our client considers that the Council has not sufficiently addressed this issue for Trowbridge. We note the reference at paragraph 2.18 highlights the reference within the WCS (para 4.30) which states: "The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area" It cannot therefore follow that the disaggregation between Trowbridge and the Trowbridge Community Area is an absolute bar and that the wider Trowbridge Community Area should be discounted from meeting an element of the undersupply. The decision by the Council within the HSAP to not fully explore the wider Trowbridge Community Area is not justified and effective.</p>				

Noting that a clear objective of the HSAP is to ensure flexibility in the delivery of the WCS and indicative requirements the Council must flexibly consider all sustainable and deliverable options in the relevant Community Areas to meet the housing shortfall in particular within the Trowbridge Community Area where the shortfall is acute.

The role of the Large Villages surrounding Trowbridge needs to be acknowledged and differentiated given their close proximity to the principal town which is a 'primary focus for development'. There is no harm in the close outlying Large Villages to Trowbridge (a short distance from the town centre) taking an element of growth to meet the needs of the whole community area particularly where supply is so constrained and past housing delivery performance has been poor.

Paragraphs 2.21-2.23

The Plan states that Neighbourhood Plans have a role in meeting the District's housing requirement. We recognise that some parishes and neighbourhood forums may seek to include housing allocations within their Neighbourhood Plan; however, it should be noted that there is no statutory or policy obligation or imperative for them to do so. The responsibility to ensure that housing requirements are met therefore remains with the Local Planning Authority (LPA) and the HSAP must ensure that it makes sufficient provision to meet current needs. There is some acknowledgement of this within paragraph 2.23; however, the strategic imperative to meet housing requirements rests with the local planning authority and to support the delivery spatial strategy in areas where there is a significant undersupply of housing. Reliance on future Neighbourhood Plans to address any future shortfall creates considerable uncertainty.

Paragraph 2.13

The HSAP must plan for the full identified housing requirement in Wiltshire, and should therefore respond to the latest evidence on housing need to ensure that it positively plans for housing growth. This includes taking account of the Government's proposed standardised housing need methodology in due course.

Paragraphs 2.16-2.18

The HSAP must make clear from its outset that in Community Areas where there is a projected housing shortfall, that the LPA will review the spatial strategy openly and flexibly to consider all sustainable and deliverable options in those Community Areas and in particularly the Trowbridge CA. The Plan should also consider sustainably located sites within the Community Area which are proven to be available, deliverable and suitable, particularly where larger, more complex and constrained allocations have failed to deliver housing. This necessitates a review of the site selection methodology to not exclude the remainder of the Trowbridge Community Area at the outset and to properly consider the role of Large Villages within close proximity to a Principal Settlement.

Paragraphs 2.21-2.23

The Plan must acknowledge here that the Council retains a responsibility to meet its overall housing need, and that in areas where a significant housing shortfall is projected that the Council will review the delivery strategy flexibly and positively consider all available, deliverable and sustainable options to meet identified housing needs.

On behalf of our client, Redrow Homes (South West) Ltd, please find enclosed representations to the Regulation 19 Consultation on the Wiltshire Housing site Allocations Plan (HSAP) Pre-Submission Document.

We set out below a summary of the enclosed representations:

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We urge the Council to review this information in light of our comments and concerns regarding the HSAP strategy and proposed allocations, and to positively allocate our clients site for residential development to support the delivery of housing in the Trowbridge Community Area.

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Attached files (Please see Objective)

4740492 / 4740490 / 4740491

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To enable a detailed review of these representations and to assist the Inspector's thorough examination of the draft plan.

Comment ID:	3080	Consultee The Heytesbury Estate Person ID: 1137004	Agent Mark Richards Senior Planner Savills Person ID: 1137062	Do you consider the draft WHSAP is legally compliant?																
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?																
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Housing Site Allocations DPD Consultation Response - The Heytesbury Estate</p> <p>This consultation response is prepared by Savills (UK) Ltd on behalf of The Heytesbury Estate. The submission has been prepared following an invitation by Wiltshire Council to comment on the draft Wiltshire Housing Site Allocations (HSAP) DPD.</p> <p>The response makes specific comments on particular sections of the HSAP DPD, clearly outlining whether they are considered to be sound or unsound with reference to the tests of soundness outlined in paragraph 182 of the National Planning Policy Framework (NPPF).</p> <p>The submission also identifies land at Heytesbury as a suitable site for allocation in the HSAP DPD and indicative plans are submitted with this letter to illustrate how this site might be developed. The local planning authority is encouraged to consider this site for allocation in the Plan.</p> <p>Tables 4.4, 4.5 and 4.6 - The approach taken to identifying sites for allocation</p> <p>UN SOUND</p> <p>Tables 4.4, 4.5 and 4.6 of the draft HSAP DPD provide a summary of those sites which are currently favoured for allocation. It is considered that the approach taken by Wiltshire Council, as presented in these tables, is not the most appropriate strategy when considered against reasonable alternatives and it will not be effective in delivering the housing development that Wiltshire needs over the plan period. Therefore, in accordance with paragraph 182 of the NPPF, the draft HSAP is unjustified, ineffective and is thus unsound. Justification for these conclusions is set out below.</p> <p>The sites currently identified within the draft HSAP, when considered together, show far too much reliance upon large housing developments, which are to be provided almost exclusively at Wiltshire's larger settlements (i.e. Principal Settlements and Market Towns. Indeed this was also the approach applied when selecting sites for allocation in the Wiltshire Core Strategy. The table below provides a summary of all the sites allocated in the Core Strategy and those currently proposed for allocation in the draft HSAP DPD.</p> <p>Core Strategy Allocations</p> <table border="0" data-bbox="450 1177 2184 1490"> <thead> <tr> <th data-bbox="450 1177 672 1212">>100 units</th> <th data-bbox="672 1177 1388 1212"><100 units</th> <th data-bbox="1388 1177 2184 1212">Settlement Hierarchy</th> </tr> </thead> <tbody> <tr> <td data-bbox="450 1212 672 1276">150</td> <td data-bbox="672 1212 1388 1276">Bradford on Tone</td> <td data-bbox="1388 1212 2184 1276">Market Town</td> </tr> <tr> <td data-bbox="450 1276 672 1340">475</td> <td data-bbox="672 1276 1388 1340">Ludqershall</td> <td data-bbox="1388 1276 2184 1340">Market Town</td> </tr> <tr> <td data-bbox="450 1340 672 1404">220</td> <td data-bbox="672 1340 1388 1404">Marlborough</td> <td data-bbox="1388 1340 2184 1404">Market Town</td> </tr> <tr> <td data-bbox="450 1404 672 1490">2,600</td> <td data-bbox="672 1404 1388 1490">Trowbridge</td> <td data-bbox="1388 1404 2184 1490">Principal Settlement</td> </tr> </tbody> </table>					>100 units	<100 units	Settlement Hierarchy	150	Bradford on Tone	Market Town	475	Ludqershall	Market Town	220	Marlborough	Market Town	2,600	Trowbridge	Principal Settlement
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900	Warminster	Market Town
250	Westbury	Market Town
500	Salisbury	Principal Settlement
1,250	Salisbury	Principal Settlement
200	Salisbury	Principal Settlement
1,100	Salisbury	Principal Settlement
450	Wilton	Local Service Centre
450	Salisbury	Principal Settlement
1,300	Amesbury	Market Town
Draft Housing Site Allocations DPD		
270	Ludgershall	Local Service Centre
200	Trowbridge	Principal Settlement
150	Trowbridge	Principal Settlement
180	Trowbridge	Principal Settlement
205	Trowbridge	Principal Settlement
100	Warminster	Market Town
640	Salisbury	Principal Settlement
100	Salisbury	Principal Settlement
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15	Market Lavington	Local Service Centre
50	Market Lavington	Local Service Centre

15	Market Lavington	Local Service Centre
50	Hullavington	Large Village
30	Yatton Keynell	Large Village
50	Crudwell	Large Village
45	Trowbridge	Principal Settlement
20	Trowbridge	Principal Settlement
70	Warminster	Market Town
30	Warminster	Market Town
35	Chapmanslade	Large Village
40	Bratton	Large Village
45	Durrington	Market Town
15	Durrington	Market Town
10	Salisbury	Principal Settlement

The information from the above table has been condensed into a summary table below which provides a clear breakdown of the balance of new homes to be provided on larger/smaller sites and at the larger/smaller settlements.

Summary Table

Total homes delivered on sites >100 units	11,790	95.8%
Total homes delivered on sites <100 units	520	4.2%
Total homes delivered at Principal Settlements and Market Towns.	11,755	95.5%
Total homes delivered at Local Service Centres and Large Village	555	4.5%

The table above illustrates a significant imbalance in terms of where Wiltshire Council is seeking to locate new homes over the coming plan period. It shows that 95.8% of new homes will be delivered on sites of 100 units or more, with only 4.2% on sites of fewer than 100 units. It also shows that 95.5% of new homes will be focussed at the Principal Settlements and Market Towns, compared to only 4.5% at the Local Service Centres and Large Villages. This approach is unsound for various reasons. For example:

The housing needs of Wiltshire's smaller rural communities will continue to go unmet. This approach will constrain the supply of new homes (including affordable homes) at the Rural Service Centres, Large Villages and other smaller settlements. The effect of this will be that local people, particularly the young and family households will not be able to afford to live in the communities they grew up in and will be forced to leave.

Wiltshire Council are effectively seeking to place far too many eggs in too few baskets. If even a small number of sites allocated in the Core Strategy, or proposed to be allocated in the draft HSAP DPD fails to deliver new homes within the Council's optimistic timeframes, the county will fall behind on its housing delivery targets. This would mean that the Council again is unable to demonstrate a five year supply of housing sites and would again be vulnerable to speculative development proposals in unfavourable locations.

Larger sites inevitably have long lead in times before development can commence and before new homes can be delivered due to the substantial costs involved and the time required to deliver supporting infrastructure. It is therefore very likely that certain sites will suffer delays as a result.

The larger sites at the higher order settlements are generally all controlled by a small number of volume housebuilders. It is not in the interests of these housebuilders to deliver new homes at the rate anticipated by Wiltshire Council, rather they will inevitably control the rate of delivery so as to maximise the returns on each unit provided. This is a problem currently facing North Dorset District Council and South Somerset District Council, where the slow rate of delivery at the larger allocated sites has resulted in both authorities falling behind on their five year supply targets.

The proposed approach of relying so heavily on larger sites at the higher order settlements has therefore been demonstrated to be flawed. Instead, it is strongly recommended that Wiltshire Council seeks to use the HSAP DPD as an opportunity to redress this balance by allocating a greater proportion of new homes on smaller sites at the Rural Service Centres, Large Villages and even smaller settlements where appropriate. This approach will result in the following benefits:

The development needs of all Wiltshire's communities (including its rural communities) will be met over the coming years. Allocating more smaller sites will create opportunities for small and medium sized builders who are able to deliver new homes quickly, thus maintaining sufficient levels of overall delivery across the county. This will also help to address the current over-reliance on a small number of volume housebuilders who currently control the Wiltshire housing market.

By allocating a greater number of smaller sites across a greater number of settlements, Wiltshire Council would not be so heavily reliant on any one allocation to meet its delivery targets.

In light of the factors discussed above it is considered that the approach taken to the HSAP DPD should be amended to rebalance the types of sites to be allocated and the location of those sites. In order to meet the Council's challenging housing delivery targets it is considered that at least 25% of the new homes allocated in the HSAP DPD should be provided on sites of fewer than 100 dwellings and at least 25% should be provided at the lower order settlements including Rural Service Centres and Large Villages . This would make the HSAP DPD sound.

Policy H2 - Allocations in the North and West Wiltshire Housing Market Area
UNSOUND

Policy H2 lists the draft site allocations for the North and West Wiltshire Housing Market Area. It is considered that the strategy for this area is far too reliant upon allocations at the Principal Settlements and Market Towns, with too few new homes allocated at the Rural Service Centres and Large Villages. It is therefore considered that the approach taken by Wiltshire Council is not the most appropriate strategy, when judged against reasonable alternatives and it will not be effective in delivering the housing development that Wiltshire needs over the plan period. Therefore, in accordance with paragraph 182 of the NPPF, the draft HSAP is unjustified, ineffective and is thus unsound.

The risks and adverse effects of allocating such a significant proportion of new homes to the Principal Settlements and Market Towns, with so few allocated at the smaller settlements has already been set out above and so is not repeated here. In short, this approach will further exacerbate problems of undersupply and affordability at the smaller settlements and is very unlikely to achieve the rates of overall delivery required to allow Wiltshire Council to meet its housing targets over the coming plan period. A more appropriate approach would be to direct a greater proportion of new homes to the Rural Service Centres and Large Villages. Such sites will inevitably be subject to fewer constraints and could be delivered in a timely manner.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	3081	Consultee The Heytesbury Estate Person ID: 1137004	Agent Mark Richards Senior Planner Savills Person ID: 1137062	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Warminster CA				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land West of Greenlands, Heytesbury</p> <p>The Heytesbury Estate would like to formally promote land at the village of Heytesbury for allocation in the emerging HSAP DPD. Enclosed with this submission is a site location plan along with a concept masterplan which illustrates how development could be delivered at the site. Heytesbury is defined as a 'Large Village' in the Wiltshire Core Strategy. Core Policy 1 states that development should be allowed to come forward at the Large Villages to help meet their housing needs and to improve employment opportunities, services and facilities. On this basis, the allocation of sites at Large Villages such as Heytesbury is entirely consistent with Core Policy 1 of the Core Strategy. This point is further supported by the fact that Wiltshire Council is proposing to allocate land for development at Chapmanslade, which is also defined as a Large Village.</p> <p>Heytesbury village is located approximately 3.5km south east of Warminster. The village provides a good range of services and facilities including a primary school, pubs, post office, a church and football and cricket pitch facilities. Heytesbury also benefits from a regular bus service which provides access to Warminster, Trowbridge, Bradford-on-Avon, Salisbury, Bath and many other settlements. Heytesbury is therefore considered to be a sustainable village and an appropriate location for housing development to meet local needs.</p> <p>In promoting the land west of Greenlands for allocation in the emerging HSAP DPD, the following site points are considered to be most relevant: The site is situated at the edge of the village but is physically well related to existing development, with the homes at Greenlands to the east, South View to the south east and the Westlands and Little London housing areas to the north east. To the north west of the site, on the opposite side of High Street, Westover House provides a Bed and Breakfast business.</p> <p>The site fronts on to two roads including High Street along its northern border and Greenlands to the east. High Street is a long and relatively straight road, which allows for excellent visibility when looking in both directions along the highway. The submitted Concept Masterplan illustrates how an acceptable access junction to the site can be designed to serve a new residential development at the site.</p> <p>The site boundaries are generally defined by fairly sparse hedges, interspersed with mature trees. The submitted concept masterplan for the site illustrates how these boundaries can be strengthened through planting of native hedgerows and trees, which will have landscape and ecological benefits.</p> <p>Heytesbury is a village with a Conservation Area, which is generally focussed around the more historic parts of the village. At its nearest point, the site is around 85 metres from the edge of the Conservation Area and it is not considered that the site forms an important part of the setting to the Conservation Area.</p> <p>There are no listed buildings, Scheduled Ancient Monuments or World Heritage sites located within or in the vicinity of the appraisal site.</p> <p>There are no public rights of way crossing the site or running along its boundaries.</p> <p>The site comprises generally flat land, currently used for the grazing of horses. There are no significant physical constraints to development at the site and so it could be delivered in the short term.</p>				

	<p>There is an opportunity to deliver community benefits at the site in addition to the delivery of open market and affordable homes to meet local needs. The landowner is committed to engaging in a process of meaningful community consultation to establish what form this might take, but it could for example include the provision of public open space, children's play facilities, a community orchard, allotments or even land for a new community facility if so required.</p> <p>A development at the site would provide an appropriate allowance of affordable homes on-site to meet local needs.</p> <p>The River Wylde flows past the south eastern corner of the site. Although much of the land to the south of Heytesbury is identified as 'flood zone', this does not extend into the appraisal site itself. As such, the site is not constrained by flood risk.</p> <p>The River Wylde is designated as a SSSI and Special Area of Conservation (SAC). It is not anticipated that development at the site would impact the ecological value of the river due to the presence of existing development between the site and the river. That said, the landowner will work closely with Wiltshire Council and Natural England to ensure that development at the site safeguards (and where possible enhances) the ecological value of the River Wylde. The submitted indicative proposals show how the south east corner of the site could potentially remain undeveloped, if required to avoid causing harm to the ecological designation.</p> <p>In considering for how the site could be developed there are considered to be two options as follows:</p> <ol style="list-style-type: none"> 1) One option would be to deliver a smaller development focussed in the eastern part of the site (approximately 0.9ha). Allowing for an appropriate provision of open space (or other community benefits) as part of the development it is considered the site would have potential to provide approximately 33 dwellings. 2) An alternative option would be to develop the entirety of the site (approximately 2.5ha). Allowing for an appropriate provision of open space (or other community benefits) as part of the development it is considered the site would have potential to provide approximately 61 dwellings. <p>I trust you will agree that the land west of Greenlands represents an appropriate location for future housing development to meet local needs. This written submission, along with the submitted indicative proposals for the site illustrate how an appropriate form of development can be delivered at the site which responds to the local character of the village and which delivers significant benefits to the village as a whole. Wiltshire Council is therefore respectfully requested to consider this site for allocation in the emerging Housing Site Allocation Plan DPD.</p> <p>Should you require any further information in respect of the points raised in this submission then I would invite you to contact me using the details provided above.</p>
<p>Attached files (Please see Objective)</p>	<p>4740438</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3082	Consultee Mr S H Crook	Agent Mr Aaron Smith Senior Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 758096	Fowler Architecture & Planning Ltd Person ID: 758092	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>MR S H CROOK PROVIDES A SEPARATE STATEMENT TO SUPPORT THE LEGAL COMPLIANCE AND SOUNDNESS OF THE DPD. MR S H CROOK RECOMMENDS CHANGES TO POLICY H1.1 TO ADD CLARITY TO THE WORDING OF THE POLICY TEXT AND THE SUPPORTING TEXT.</p> <p>[Refer to attached representations in full. Summarised below.]</p> <p>DPD Section 4 'How were sites selected?' – Paragraphs 4.6 to 4.27</p> <p>2.1 The approach taken, as summarised in paragraphs 4.6 to 4.27, to select sites is supported as a sound basis upon which the DPD has been prepared.</p> <p>DPD Section 4 'Summary of site allocations' – Table 4.4</p> <p>3.1 The identification of Land at Empress Way as an allocation in Table 4.4 is supported as a sound means to meet the objectives of the DPD as restated at paragraph 4.29.</p> <p>DPD Section 4 'Summary of site allocations' – Table 4.4</p> <p>3.1 The identification of Land at Empress Way as an allocation in Table 4.4 is supported as a sound means to meet the objectives of the DPD as restated at paragraph 4.29.</p> <p>Given the above very poor rates of affordable housing delivery in Wiltshire and the EWHMA against an aspirational target that does not meet the needs, this further reinforces the considerable benefits available by treating the Policy CP2 housing requirement as a minimum, to be exceeded. The allocation of land at Empress Way will contribute up to 81 affordable homes in accordance with Policy CP43 that is a considerable benefit.</p> <p>DPD Section 4 'Objective 3 East Wiltshire Housing Market Area' – Table 4.9</p> <p>5.1 The level of growth in Table 4.9 for the EWHMA is supported for the reasons stated above.</p> <p>the 5% variation for the Market Town coupled with the proposal to allocate the Land at Empress Way under Policy H1.1 is sound; as it will ensure choice and competition in the market for housing land is required in order to give surety on the EWHMA and TCA housing requirements. The release of this additional land is required now to help to provide the greatest possibility that the requirements will be reached and deliver the strategic objectives for the TCA to improve socio-economic conditions, including providing affordable housing.</p> <p>DPD Section 5 'Policy H1.1' – Figure 5.1</p> <p>6.1 The proposal to allocate the 'Land at Empress Way, Ludgershall' under Policy H1.1 is sound and is therefore supported.</p> <p>6.2 In addition to these representations, Mr S H Crook provides the following Appendices in support of the allocation of the site:</p> <p>A. Drawing Nos.A094281-GA01A, 140405/01 and 140405/03</p> <p>B. Decision Notice for 16/10907/OUT</p> <p>C. Kennet Local Plan extracts</p> <p>D. Documents:</p> <ul style="list-style-type: none"> • Agricultural Land Classification Report – by ADAS 				

- Archaeological Evaluation Report – by Pre-Construct Archaeology
- Archaeological Geophysical Survey Part 1 Report – by Stratascan
- Archaeological Geophysical Survey Part 2 Plans – by Stratascan
- Arboricultural Implications Assessment – by SJ Stephens
- Arboricultural Implications Assessment Drawing No.952-02.1 – SJ Stephens
- Arboricultural Implications Assessment Drawing No.952-02.2 – SJ Stephens
- Contaminated Land Study (Phase 1) Part 1 – by Clarkebond
- Contaminated Land Study (Phase 1) Part 2 – by Clarkebond
- Design and Access Statement – by Fowlers
- Ecological Appraisal – by LCES
- Flood Risk Assessment – by AAH Planning
- Foul Water Capacity Study – by AAH Planning
- Landscape and Visual Impact Assessment – by ACLA
- Transport Assessment – by WYG Transport

Our client supports the allocation of 'land at Empress Way, Ludgershall' under Policy H1.1 of the DPD. The inclusion of the allocation is a sound component upon which the Council should submit the DPD for examination at the earliest opportunity.

Detail of the allocation

6.14 The PPG at ID: 12-010-20140306 states:

“Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).

The policies map should illustrate geographically the policies in the Local Plan and be reproduced from, or based on, an Ordnance Survey map. If the adoption of a Local Plan would result in changes to a previously adopted policies map, when the plan is submitted to the Planning Inspectorate for examination an up to date submission policies map should also be submitted, showing how the adopted policies map would be changed as a result of the new plan.”

6.15 In response to the policy text, Mr S H Crook would comment changes are required to provide clarity, as follows in red text:

“Land at Empress Way, as identified on the Policies Map, is proposed for mixed use development comprising the following elements:

- approximately 270 dwellings;
- an extension to Empress Way to distributor road standard to facilitate an unhindered future eastward connection to the A342;
- future connections to the land to the south and east (not counting the Empress Way extension);
- a connecting highways link between Empress Way and Simonds Road/New Drove, via the adjoining development at the former Granby Gardens site;
- 1.8ha of land reserved for a two form entry primary school.
- A strong landscape framework including significant screening to the southern and eastern boundaries of the site

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.”

The matters introduced above are in response to the advice from Mark Wiltshire (Major Projects Officer) dated 4 August 2016.

6.17 In response to paragraphs 5.17 to 5.21, Mr S H Crook would comment changes are required to the supporting text of H1.1 to add clarity, as follows in red text:

5.17 Approximately 16.5ha of land at Empress Way, as shown on the policies map, are allocated for development. The proposal is to extend land already with permission(17) for housing development to allow for a further approximately 1601 dwellings. The total amount of development will therefore be approximately 270 dwellings. The treatment and design of the site will be one comprehensive development proposal.

5.18 The site is formed of agricultural land on the southern edge of the town including land that has been previously approved for use as a garden centre [K/59593/O] later replaced with a permission for housing development. It is a logical extension to the town in an accessible location with regard to local services and facilities but there are limited established natural boundaries that help to enclose the site. There are no

field boundaries on the site's southern and eastern edges, although there is limited screening on the boundaries adjoining the railway line and existing residential development.

5.19 Vehicular access to the site would be required from Empress Way and via the Granby Gardens development site from Simonds Road. The trigger point for the delivery of the access via Simonds Road will be determined by transport assessment. Development of the site will include a connecting link road through the site to the two points of access. Historically development to the south of the railway line was envisaged to be connected to the road network further east. The long term opportunity to provide this southern link road should not be closed. Hence, the extension to Empress Way should be constructed to the relevant standard to facilitate future unhindered connection eastwards across the railway line to the A432. In addition, connections to the land to the south and east should be delivered to not preclude future extension of the site. Transport assessment will inform detailed measures to mitigate impacts on the local road network, including the A342 Andover Road, Memorial Junction and the capacity of the signals on the nearby railway bridge.

5.20 Development of the site will include 1.8ha reserved for a 2 form entry primary school. Based on current estimates local primary school capacity will be absorbed by committed development elsewhere in the town. The period and need to retain the reserved land for a school will be determined as part of the application process based on projected demand for primary school places at that time. In the event the land is not required within the period then the reserved land will be returned.

5.21 The site design will be led by a strong landscape framework. Significant additional screening at the southern and eastern site boundaries would be required, along with landscaping and green infrastructure throughout the site as there are middle and long distance views of the site from the south. The final design and layout should be informed by a Landscape and Visual Impact Assessment.

The suggested revisions at paragraph 5.17 clarify the approximate nature of the amount of development consistent with the wording of the policy.

6.19 The suggested revisions at paragraph 5.18 clarify that while the land use is arable, a section of the site has a history of planning permission for urbanising land uses.

6.20 The suggested revisions at paragraph 5.19 clarifies that a trigger will be informed by transport assessment as to when the second point of access via Simonds Road will need to be delivered. At the time of writing, the Transport Assessment for 16/10907/OUT stated:
 "Planning consent reference E/2013/0234/OUT allows 109 of the 269 units currently proposed to be accessed directly from Empress Way. The Transport Assessment supporting that application identified the Tidworth Road / Astor Crescent traffic signals as operating at 88.2% in this scenario. ... with development of the full 269 residential units, the Primary School and provision of the link road through to Simonds Road the traffic signals will operate at 93.1%. If this second value is considered acceptable in the long term (full development) then it should also be acceptable in the short term (partial development) in the Empress Way / Astor Crescent only access scenario.
 As such, additional residential development over and above the 109 previously consented can be accessed via Empress Way alone before reaching the 93.1% capacity tipping point. It is considered that the difference between the 88.2% and 93.1% capacity values equates to approximately 40 residential units therefore 149 of the 269 units the subject of this report could be accessed via Empress Way only before the need for the connection through to Simonds Road is triggered".

6.21 In addition, other changes at 5.19 emphasise the strategic importance to not close the opportunity to extend Empress Way eastwards over the railway line to the A342. This would provide a new distributor road to the south of Ludgershall. This remains a clearly stated aspiration within Kennet Local Plan Saved Policy HC16 and accompanying paragraph 2.32 – Appendix C. Any development of this allocation should not preclude that southern link road from being delivered.

6.22 The suggested revisions at paragraph 5.20 seek clarity that the determination of the need for the primary land will also determine the period of any reservation. The judgement will also be based on projected demand for school places. Furthermore, that the reserved land will not be held in perpetuity by the Council (if not needed) and provisions are to be made for its return after the period.

Attached files (Please see Objective)

4740481 / 4740479 / 4740468 / 4740469 / 4740485 / 4740480 / 4740476 / 4740470 / 4740483 / 4740482 / 4740471 / 4740478 / 4740484 / 4740473 / 4740472 / 4740474 / 4740486 / 4740475 / 4740477

If your representation is seeking a change, do you consider it necessary to

MR S CROOK IS THE LANDOWNER OF ONE OF THE PROPOSED ALLOCATIONS IN THE DPD – ON LAND AT EMPRESS WAY, IDENTIFIED UNDER POLICY H1.1.
 AS THE PURPOSE OF THE EXAMINATION IS FOR THE INSPECTOR TO DETERMINE THE SOUNDNESS OF THE PLAN AND OF THE PROPOSALS FOR DEVELOPMENT THAT MAKE UP THE PLAN, MR S H CROOK WISHES TO EMPLOY REPRESENTATIVES TO

**participate at the oral part
of the examination?**

PARTICIPATE ON HIS BEHALF TO ANSWER ANY QUESTIONS CONCERNING THE AVAILABILITY, SUITABILITY AND ACHIEVABILITY OF THE ALLOCATION.

Comment ID:	3083	Consultee McCarthy & Stone Retirement Lifestyles Ltd and Churchill Retirement Living	Agent Miss Carla Fulgoni Senior Associate	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 820746	The Planning Bureau Ltd Person ID: 1137249	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Thank you for the opportunity to comment on the consultation papers for the aforementioned document. As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the Housing Site Allocations Plan consultation, insofar as it affects or relates to housing for the elderly.</p> <p>The National Planning Policy Framework stipulates that the planning system should be ‘supporting strong, vibrant and healthy communities’ and highlights the need to ‘deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community... such as... older people’ (emphasis added).</p> <p>The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled “How should the needs for all types of housing be addressed? (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for “Housing for older people”. This stipulates that “the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important” (My emphasis).</p> <p>The ‘Housing White Paper: Fixing our broken housing market’ clearly signals that greater consideration must be given to meeting the needs of older persons’ in Local Plans stipulating that</p> <p>‘Offering older people a better choice of accommodation can help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services⁸². It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people.’ (Para 4.42) (My emphasis).</p>				

The adopted Wiltshire Core Strategy identifies that Wiltshire has an ageing population, and states that this is more so than the national average. Paragraph 2.14 states that “by 2026 there will be a higher proportion of the older age groups, including the over 85s. This part of the population is predicted to grow the fastest, by 89.4%, over the next 15 years”. Core Strategy Policy 46 identifies the importance of meeting the needs of Wiltshire’s vulnerable and older people.

In line with the rest of the country, this demonstrates an acceptance that the demographic profile of the Authority is projected to age. The largest proportional increases in the older population are expected to be of the ‘frail’ elderly, those aged 85 and over, who are more likely to require specialist care and accommodation provided by Extra Care accommodation. It is therefore clear that the provision of adequate support and accommodation for the increasingly ageing demographic profile of the Borough is a significant challenge.

We note that there are no allocations for the delivery of older persons’ accommodation in the Housing Site Allocations Plan, nor is there consideration of the suitability of the sites detailed for such developments.

Unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population in Wiltshire, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the areas housing needs.

We would advocate that the Council take a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population within the Housing Site Allocations consultation document. There is an opportunity to facilitate the delivery of Specialist accommodation by identifying locations for the delivery of Older Persons Accommodation within existing or new Housing Site Allocations.

We consider that the best approach towards meeting the diverse housing needs of older people is one that encourages both the delivery of specialist forms of accommodation such as sheltered / retirement housing and Extra Care accommodation.

When selecting sites for elderly persons’ accommodation careful consideration is given to locational criteria including: Topography, Environment (including safety and security), Mobility, Services and Community Facilities. As such, suitable sites for specialist accommodation for the elderly are difficult to find and tend to be located within, or adjacent to town or local centres. It is therefore highly unlikely that the majority of development sites will be suitable for specialist accommodation for the elderly, particularly on urban extension sites where access to goods and services may be limited. Having said that, when new local centres are being created these may also provide an appropriate location for retirement housing developments.

Specialist accommodation for the elderly also usually provides an element of care and communal facilities at an additional cost to the developer. This requires a critical mass of residents in order to be feasible and small scale developments of specialist housing for the elderly could not be realistically asked to provide or maintain such facilities. It is therefore unlikely to expect the provision of specialist accommodation for the elderly to be met piecemeal in general needs housing developments.

We would like to highlight the advice provide in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. This toolkit was developed by a consortium of private and public organisations with an interest in housing for the elderly and encourages a joined up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. A copy of this document has been appended for your convenience. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the ‘Lifetime Homes’ standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.

The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”

Well located and designed specialist housing for older home owners is a highly sustainable form of housing. Given the critical need for older persons accommodation in Wiltshire there should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites. It is recommended that greater weight is attached to this approach alongside the desire to release residential land within strategic allocations or indeed a separate policy within the document to cover the housing need for the ageing population. This accommodation will come from a number of sources both public and private and with varying levels of care and shelter provision enabling

	<p>individual people to remain in their own home with independence and security. In effect there should be more of a positive policy supporting older people's accommodation in the same way that affordable housing is given a high priority.</p> <p>I trust that the above comments will be considered in the evolution of any emerging consultation document and that we will continue to be invited to comment as the document progresses.</p> <p>We would advocate that the Council take a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population within the Housing Site Allocations consultation document. There is an opportunity to facilitate the delivery of Specialist accommodation by identifying locations for the delivery of Older Persons Accommodation within existing or new Housing Site Allocations.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>If not amended, as proposed elements of the DPD put the delivery of retirement properties into jeopardy.</p>

Comment ID:	3084	Consultee Gerry Keay Waddeton Park Limited	Agent Mr Mark Scoot Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1137312	Maypool Estates Person ID: 1137310	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Melksham Community Area Topic Paper	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The draft document assumes that there will be no additional housing in Melksham and therefore makes no allocations for development. The representations submitted in respect of the Draft Wiltshire Housing Site Allocations Plan confirm that such an approach is not appropriate and would not be in accordance with the Framework. Melksham is clearly a sustainable location for further development and there is no evidence to demonstrate that it could not accommodate further growth during and beyond the plan period. In order to make the plan robust and sound (by allocating above minimum housing requirements), the settlement boundary should be extended to accommodate the land North of Woodrow Road that was promoted for development under planning application reference 16/05644/OUT and shown on the attached red line plan. Whilst the application was refused earlier this year, the only reason was because it represented development beyond the outdated settlement boundaries. There are no other constraints to development and it is clear that it can come forward in the short term, deliver a full range of planning obligations and make a valuable contribution to the future land supply without any detrimental impacts.				
Attached files (Please see Objective)	4741283				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	In order to present the case in the most effective manner and to outline the changes needed to make the plan sound.				

Comment ID:	3085	Consultee Gerry Keay Waddeton Park Limited	Agent Mr Mark Scoot Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1137312	Maypool Estates Person ID: 1137310	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Woodrow Road, Melksham		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In our opinion, the emerging plan is seeking to interpret minimum housing requirements as maximum targets and this approach will mean that the full housing need for the area will neither be planned for or delivered. This is clearly in breach of the core Framework objectives to boost housing land supply and maintain at all times a deliverable five year land supply.</p> <p>The Core Strategy Inspectors Report (December 2014) confirmed that the housing figures are minimum figures rather than maximum targets and therefore in the context of the need to boost housing land supply the planning system should be seeking to demonstrably exceed these minima. Despite these being minima the Council has failed to maintain a five year land supply in the relevant policy area for most of the period since the Inspectors Report was issued and despite the comments in Paragraph 80 of the Inspectors Report (below) has not reviewed the objectively assessed housing need (for example a new SHMNA has not been prepared despite having received guidance that one should):</p> <p>80. Nonetheless, the Framework calls for a significant boost to housing supply. Achieving an average delivery rate of 2,100 over the entire plan period, not merely the pre-recession period, would be significantly above recent annual performance and the longer term historic average as a whole; it would equate to some 42,000 homes. Whilst the achievement of such a figure should be subject to careful monitoring, the evidence indicates the fluctuations that can occur in the delivery of housing but does not conclusively indicate that such a delivery rate cannot be met during the course of the plan period to deliver the significant boost in housing required to go some considerable way to meeting needs. Against this context and mindful of the content of the LDS (partial CS Review), the subsequent intended early review of the CS, the Sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly.</p> <p>The emerging DPD should plan to deliver in excess of the minimum requirements to ensure a five year supply and meet the full housing need of the plan area. The Core Strategy Inspectors Report gave specific consideration to Melksham and future housing requirements and raised specific concerns about future shortfalls that are not addressed in the emerging DPD:</p> <p>285. The submitted CS indicated at least 2,040 new homes would be provided over the life of the plan of which 1,930 should be accommodated at Melksham. No strategic sites were identified and the Council had an expectation that the neighbourhood planning process would provide a basis for delivering the remaining housing required. Subsequent to its consideration of the overall housing provision for the county and its disaggregation across the three HMAs, the Council has proposed a revised and indicative amount of housing for this Community Area. Consequently, the level of indicative housing contained in Core Policy 15 is proposed to be 2,370 homes, of which some 2,240 would be at Melksham and 130 in the remainder of the Community Area. With due regard to the updated evidence base, including the SA, the SHMA and the Council's Topic Papers I have no specific evidence to suggest that such an approach would not deliver suitable levels of sustainable development and is not justified adequately. I recommend accordingly (MM 47).</p> <p>286. The principle of Core Policy 15 is consistent with the objectives of the Core Strategy as a whole. The volume of intended housing is expressed indicatively and appropriately which provides some flexibility for the overall level of provision and I am mindful that the Council's SA sets out the process which has led to the absence of any strategic site allocation for the town.</p>				

287. The CS as proposed to be changed would enable the Sites DPD and the neighbourhood planning process to facilitate the provision of the required level of housing albeit, notwithstanding the early work between Melksham Town Council and Melksham Without Parish Council, there is some current uncertainty as to when any neighbourhood plan may emerge and what it may 115 Topic Paper 3 et al Wiltshire Core Strategy, Inspector's Report December 2014 - 66 - specifically address. In such a context the absence of a strategic allocation does not aid the certainty of the Plan in delivering the housing required; indeed, the provision of a housing allocation capable of delivering, for example, in excess of 400 homes would contribute to the strategic objectives of the CS in terms of housing land supply and potentially, in the event of a mixed use scheme, a more balanced economy.

288. Whilst, in the shorter term, there appears to be sufficient commitments to ensure an adequate supply of housing land for the town, there is a notable degree of uncertainty for the latter part of the plan period. The Council acknowledged in its Position Statement the scope for a Sites DPD to assist in delivering such housing which, given my earlier comments in relation to overall housing numbers for the county, seems to be the most pragmatic and efficient way of complementing the neighbourhood planning process to ensure the provision of sufficient housing to meet identified needs in a timely fashion. Such an approach may also provide an opportunity to facilitate the appropriate provision of smaller sites for the Large Villages within the community area in order to ensure the delivery of adequate housing to meet the needs of the area in a sustainable fashion. By such means it will be feasible to deliver the housing numbers shown within modified Core Policy 15 as necessary. Notwithstanding the potential availability of land as promoted by submissions to the Examination, the Council's decision to not identify a strategic allocation for Melksham at this time is, on balance, warranted.

Given that a number of the emerging Neighbourhood Plans have made very limited progress (and certainly will not deliver housing land in the short term) and the concerns raised by the Core Strategy Inspector above, the emerging DPD should make further allocations for housing land in sustainable locations such as Melksham.

Table 4.44 of the emerging DPD highlights that the plan will only deliver at most 1% more than the minimum housing requirement for the North and West Wilts Policy area. Such an approach gives rise to a significant risk that an adequate land supply will not be maintained. For example, schemes may be delayed / not come forward or detailed consents may not deliver the quantum of growth anticipated at the outline stage. Further to this, the target of 22,190 is a minimum not a maximum and in no scenario can it be robust to plan to exceed minimum growth by only 1% if every single unit of 11,871 is delivered.

In order to ensure the maintenance of a 5 year land supply and to plan for more than the absolute minimum level of housing the plan should be modified by making additional allocations including land at Woodrow Road, Melksham as set out in the attached representation.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

In order to present the case in the most effective manner and to outline the changes needed to make the plan sound.

Comment ID:	3086	Consultee Mr Steve Wheeler	Agent Mr Ben Kelly Town Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1137322	Charter House Planning Person ID: 1137324	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocations Plan is not properly justified as it has failed to account for the potential to contribute much-needed housing through the development of SHLAA site 738 (Land Adjacent Danes Lye). Site 738 was discounted from the site selection process at stage 2a, due to an 'insufficient access point', however, further examination has found that safe and suitable access can be achieved onto the B3098 and the site should therefore be re-considered for allocation within the DPD. Please see the attached document for further details regarding the access point and appraisal of site 738. [refer to attached full supporting statement]</p> <p>The allocation of site 738 for residential development within the emerging Allocations Plan would help the LPA deliver the most appropriate strategy for housing development within Wiltshire. Presently, the site selection process has not fully considered the reasonable alternative sites within the Westbury Community Area based upon the evidence available and as such, the plan is not justified.</p>				
Attached files (Please see Objective)	4741270				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3087	Consultee Hill Homes Hill Homes Development Ltd	Agent Mr Stephen Young Senior Planning Consultant	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 900566	Pro Vision Person ID: 902049	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.22. Cells G4-6 & H4-6		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Table 8.1 of the Wiltshire Housing Site Allocations Plan (W HSAP) Topic Paper 1 (Settlement Boundary Review Methodology) indicates that the proposed settlement boundaries are now intended to include: "commenced residential and community facilities ... that is physically related to the settlement"; "built ... employment development in principal settlements, market towns, and local service centres that is physically related to the settlement"; but to exclude allocations or unimplemented planning permissions. Calne is a "market town". Thus commenced permissions and/or existing employment sites should be included within the proposed boundaries. There is, however, significant inconsistency regarding how the principles of Table 8.1 have been applied to the proposed settlement boundaries. For example:</p> <p>a) Fugglestone Red has commenced and is under construction. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area of outline permission S/ 2012/ 0814 and Phase 1A RM permission 15/ 05120 / REM lies outside the proposed settlement boundary for Salisbury (Cells E3- 4 and F3- 5).</p> <p>b) Longhedges, approved by 13/ 00 673/ OUT and 15/ 07253/ REM, has also commenced. A number of properties have been sold. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area lies outside the proposed settlement boundary for Old Sarum (Cells J1- 2, K1- 2 & L1).</p> <p>c) A 200 unit scheme on the NE of Calne, approved by N/ 11/ 03524/ OUT and 15/ 05831/ REM, has also commenced. Many of the properties have been allocated postal addresses by the Council. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area lies outside the proposed settlement boundary for Calne (Cells G4- 6, H4- 6).</p> <p>d) A 12 unit scheme, in close proximity to (c) and approved by 14/ 03053/ OUT and 15/ 07282/ REM, has also commenced. Some of the properties have been allocated postal addresses by the Council. By virtue of the criteria in Table 8.1, this site should be within a settlement. However, the area lies outside the proposed settlement boundary for Calne (Cell J6).</p> <p>The proposed alterations to a number of settlement boundaries are therefore not correctly related to the criteria by which they should be drawn. This error applies to a number of very significant developments within Wiltshire. There should therefore be a complete revisit of all the settlement boundaries to ensure that the criteria of Table 8.1 are being correctly applied. There should therefore be a complete revisit of all the settlement boundaries to ensure that the criteria of Table 8.1 are being correctly applied. For the avoidance of doubt these representations seek the following, as part of the reassessment of all the settlement boundaries to ensure correct application of the principles in Table 8.1 of the Housing Topic Paper on settlement boundaries: the inclusion of the Land East of Oxford Road, Calne (SN118GRat SU 00 6 722; see plan 1726- P01 [within attached document) within the revised settlement boundary for Calne. This represents an objection to the boundary as proposed on the grounds that the development is commenced, and that the principles of Table 8.1 of the Settlement Boundary Topic Paper have been incorrectly applied (Cells G4- 6, H4- 6);</p>				

	<p>the inclusion of Land North of 270 Oxford Road, Calne (SN118AP at SU 00 4 719; see plan 2062- 100 Rev B [within attached document]) within the revised settlement boundary for Calne. This represents an objection to the boundary as proposed (Cells G6, H6). The grounds for this objection are this site is surrounded by commenced development (under permissions N/ 11/ 03524/ OUT & 15/ 05831/ REM and 14/ 03053/ OUT & 15/ 07282/ REM) that should already be included in the settlement by virtue of the criteria in Table 8.1 of the Settlement Boundary Topic Paper. The site itself has recently been granted permission for residential development (16/ 05334/ FUL) and it would now be illogical to exclude the site from the revised settlement.</p>
Attached files (Please see Objective)	4742581
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3088	Consultee Hill Homes Hill Homes Development Ltd	Agent Mr Stephen Young Senior Planning Consultant	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 900566	Pro Vision Person ID: 902049	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.69			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Table 8.1 of the Wiltshire Housing Site Allocations Plan (W HSAP) Topic Paper 1 (Settlement Boundary Review Methodology) indicates that the proposed settlement boundaries are now intended to include: "commenced residential and community facilities ... that is physically related to the settlement"; "built ... employment development in principal settlements, market towns, and local service centres that is physically related to the settlement"; but to exclude allocations or unimplemented planning permissions. There is, however, significant inconsistency regarding how the principles of Table 8.1 have been applied to the proposed settlement boundaries. For example:</p> <p>a) Fugglestone Red has commenced and is under construction. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area of outline permission S/ 2012/ 0814 and Phase 1A RM permission 15/ 05120 / REM lies outside the proposed settlement boundary for Salisbury (Cells E3- 4 and F3- 5).</p> <p>b) Longhedges, approved by 13/ 00 673/ OUT and 15/ 07253/ REM, has also commenced. A number of properties have been sold. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area lies outside the proposed settlement boundary for Old Sarum (Cells J1- 2, K1- 2 & L1).</p> <p>c) A 200 unit scheme on the NE of Calne, approved by N/ 11/ 03524/ OUT and 15/ 05831/ REM, has also commenced. Many of the properties have been allocated postal addresses by the Council. By virtue of the criteria in Table 8.1, the site should be within a settlement. However, the area lies outside the proposed settlement boundary for Calne (Cells G4- 6, H4- 6).</p> <p>d) A 12 unit scheme, in close proximity to (c) and approved by 14/ 03053/ OUT and 15/ 07282/ REM, has also commenced. Some of the properties have been allocated postal addresses by the Council. By virtue of the criteria in Table 8.1, this site should be within a settlement. However, the area lies outside the proposed settlement boundary for Calne (Cell J6).</p> <p>The proposed alterations to a number of settlement boundaries are therefore not correctly related to the criteria by which they should be drawn. This error applies to a number of very significant developments within Wiltshire. There should therefore be a complete revisit of all the settlement boundaries to ensure that the criteria of Table 8.1 are being correctly applied</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3089	Consultee Mr Ron Hatchett Bloor Homes Southern	Agent Mr Martin Miller Technical Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 395552	Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		6.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed new settlement boundary for Amesbury seeks to include built and commenced residential development that is physically related to the settlement, but which excludes areas of open space.</p> <p>However, the boundary that has been drawn is historic and fails to consider construction at King's Gate that has commenced pursuant to planning permissions granted in 2016 and 2017. Unless this boundary is brought up to date so that it is accurate, the plan will not form a sound basis against which to assess future planning applications.</p> <p>The proposed new settlement boundary for Amesbury needs to be updated so that it reflects the full extent of built and commenced residential development that is physically related to the settlement of Amesbury.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is essential for the examining planning inspector to understand the full extent of development that has been permitted and taken place at King's Gate, Amesbury.				

Comment ID:	3090	Consultee Mr Ron Hatchett Bloor Homes Southern	Agent Mr Martin Miller Technical Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 395552	Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H3 identifies the allocation of two sites at Durrington for a total of 60 units to assist with delivering the housing requirements of the Amesbury Community Area and the South Wiltshire Housing Market Area. However, as the Amesbury Community Topic Paper (which forms part of the evidence base underpinning the draft Wiltshire Site Allocations Plan) fails to consider the potential for the existing Wiltshire Core Strategy strategic allocation at King's Gate, Amesbury, to accommodate additional development, it cannot be concluded that the plan's strategy represents the most appropriate strategy, which is a requirement of paragraph 182 of the NPPF. Consequently, policy H3 of the plan has not been justified and is unsound.</p> <p>The Amesbury Community Topic Paper demonstrates that SHLAA site S1013 was excluded from further consideration at stage 2a of the site assessment process because it had been permitted / completed.</p> <p>However, whilst it is true that SHLAA site S1013 has been the subject of an outline planning permission, the potential of SHLAA site S1013 site to accommodate additional dwellings has not been considered or assessed. Consequently, the sustainability merits of accommodating additional development at an under-construction strategic allocation and the sustainability merits of accommodating additional development here relative to the allocations at Durrington (and other settlements) in the draft Plan, have not been considered. In the absence of such consideration, it cannot be concluded that policy H3 of the draft Plan represents the most appropriate strategy, and so the plan has not been justified and is unsound. Policy H3 should be amended to include an allocation of up to 75 units at King's Gate, Amesbury.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	It is essential for the examining planning inspector to understand and consider the additional development potential that exists at one of the strategic allocations within the Wiltshire Core Strategy, how this potential can assist with the delivery of Wiltshire's housing requirements and how the sustainability merits of this option compares to the options being pursued by the Council through the draft plan.				

Comment ID:	3091	Consultee Mr and Mrs Dallas	Agent Mr Ian Woodward-Court Plainview Planning Ltd	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1137549	Person ID: 1137554	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.8		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Paragraph 2.8 and 3.2; and section 6 of the WHSAP sets out the rationale for using settlement boundaries. “TheWCS [Wiltshire Core Strategy] uses settlement boundaries as a policy tool for managing how development should take place.” Whilst we appreciate that the WCS has been found previously sound and adopted we do have concerns over the use of settlement boundaries if the development plan is to be flexible and respond to rapid change (NPPF 14). Settlement boundaries are a blunt instrument. It is important to note that the phrase “settlement boundary” (or derivatives) are not found at all in the NPPF. Part of the problem of settlement boundaries is that it is a binary approach to an issue that is generally subjective and open to interpretation. An example of this is apparent in Wood v Secretary of State for Communities and Local Government [2015] EWCA Civ 195 (09 February 2015): “thesettlement boundary as defined did not accord with the inspector's assessment of the extent of the village on the ground”(para 12); “the inspector had misdirected himself because he had wrongly treated the boundary of the village as defined in the Local Plan as being determinative of the issue whether the proposed development was in the village” (para 19). That particular case was about infilling in the green belt, but nevertheless it highlights the common disparity between an arbitrary settlement boundary and facts on the ground. To ensure that the WHSAP is effective and sound we seek an acknowledgement about the subjective nature of a settlement boundary: After paragraph6.2 insert: “The Council acknowledge that the settlement boundary methodology involves an element of subjective assessment. This can lead to occasional anomalies which could impact upon future planning applications and neighbourhood plans. In such cases we invite additional evidence to inform a more detailed local review as part of a planning application or neighbourhood plan process. Such a review will be carried out in accordance with the agreed methodology and assess whether a site or property adjacent to a settlement boundary should have reasonably been included”. Such a change will ensure that the WHSAP remains responsive and accurate.</p>				
Attached files (Please see Objective)	4743726				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3092	Consultee Mr and Mrs Dallas	Agent Mr Ian Woodward-Court Plainview Planning Ltd	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137549	Person ID: 1137554	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Topic Paper 1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Section 3 - "Best Practice Review" of Topic Paper 1: Settlement Boundary Review Methodology is a sensible approach. Learning from the successes or failures of other authorities is sensible.</p> <p>The first cited case study is Winchester City Council. The Topic Paper notes that Winchester draws the boundary "tightly around built form". However, no reasoning is given for choosing Winchester and no real assessment is made whether their approach is effective. This lack of rationale and reasoning means that the methodology is not justified and the WPAS is unsound.</p> <p>It is worth noting that statistics from PINS between April 2016 to March 2017 show that Winchester City Council lost 47% of planning appeals. This is significantly above the national average of 30% and suggests that the LPA are struggling to defend or correctly interpret their own development plan. A tightly draw settlement boundary could reasonably be part of the issue.</p> <p>It is a similar case with Kettering. 54% of appeals were allowed between April 2016 and March 2017. This council too is described as having a "boundary drawn tightly around built form".</p> <p>Interestingly, the Purbeck case study notes that the "boundary must be logical, easily identifiable and (normally) follow property boundaries and permanent features". This is seemingly a more flexible approach. Purbeck only have 38% of appeals allowed.</p> <p>To ensure the WHSAP is sound we ask that:</p> <ol style="list-style-type: none"> A further review of other LPA settlement boundaries is undertaken with a clear selection and performance criteria set with a view to establishing a more robust methodology; or The Purbeck approach is followed ensuring that the settlement boundary is logical, easily identifiable and applied flexibly. 			
Attached files (Please see Objective)		4743726			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3093	Consultee Mr and Mrs Dallas	Agent Mr Ian Woodward-Court Plainview Planning Ltd	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137549	Person ID: 1137554	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.7		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Table 4.7 notes that 3,633 “windfall” homes will be provided as part of the housing supply. There is a concern that drawing settlement boundaries so tightly will strangle towns and villages. In turn, this will stop small-scale infill and backland development proposals. Such development is vital to ensure windfall targets are met. To ensure the WHSAP is justified, we ask that the Inspector has before him a list of historic windfall sites and whether such sites were inside or outside the historic settlement boundary.</p>				
Attached files (Please see Objective)	4743726				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3094	Consultee Mr and Mrs Dallas	Agent Mr Ian Woodward-Court Plainview Planning Ltd	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137549	Person ID: 1137554	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		8.4		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>At paragraph 8.4 an acknowledgement is made that no formal site visits have been made in the preparation of the settlement boundaries. As already set out in the Wood v SoS case above there has to be some subjective, on-the-ground assessment of settlement boundaries. Otherwise anomalies will arise.</p> <p>The lack of definition, resolution and width of the proposed settlement boundary line and the WHSAP maps makes it very difficult to undertake any precise review or apply the line consistently. The proposed blue line is wider than many homes. See attached Sheet A.</p> <p>Paragraph 7.20 acknowledges that there was some debate on what extent of garden and curtilage to include.</p> <p>“...the revised settlement boundary review methodology will include the curtilage of a property that relates more closely to the built environment, e.g. a garden), or has limited capacity to extend the built form of the settlement in terms of scale and location”</p> <p>However, this revised approach has not been applied consistently.</p> <p>By way of an example we would like to draw the Inspector’s attention to Appendix A: Amended settlement boundaries / Marlborough Community Area / Ramsbury.</p> <p>We have undertaken an analysis of a snapshot of Ramsbury to demonstrate that the methodology is not being applied consistently and results in anomalies. See attached Sheet A.</p> <p>It is clear that the currently excluded properties do not represent “Isolated development that is physically detached from the settlement”.</p> <p>Indeed, several of the excluded properties form an intrinsic part of the historic settlement. This is evidenced on Sheet A</p> <ol style="list-style-type: none"> 1) Weconsider that the WHSAP is not justified until a formal, on-the-ground sense check of the settlement boundaries is made. 2) Weconsider that a high resolution map is released or an online mapping portal made available to allow a closer examination of the settlement boundary line. Without this the WHSAP is not justified. 				
Attached files (Please see Objective)	4743726				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3095	Consultee Mr D Lohfink CG Fry & Son Builders Person ID: 449489	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other			Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Settlement Boundary Review		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[See attached representation on the settlement boundary review and land in Hindon]</p> <p>I am writing on the Company's behalf, to provide representations on your authority's draft Housing Site Allocations Plan, now subject to formal consultation. As you may know, CG Fry & Son is an award winning, well-regarded, family-owned regional house-builder, with a current pipeline of development across the south west.</p> <p>In Wiltshire, we are active at two sites located at Kingston Farm, Bradford-on-Avon and the former Hill Brush Company site in Mere. We are soon to start up another site at Silver Street, Caine, have recently completed our Hindon Lane, Tisbury site and have an interest in land in Hindon (known as Chicklade Road or East Street).</p> <p>Regarding the Hindon site, we are currently progressing an intended development scheme of new homes and community facilities In the village (one of only 3 higher-order village settlements within the Tisbury Community Area flagged for new housing development in the adopted Core Strategy (beyond infill windfalls and such like) and within this part of the Housing Market Area. Over the past few years, we have had meetings and discussions with your Officers including Andrew Bidwell, Sarah Hughes and (more recently) Lucy Minting. Ms Minting is the Link Officer for Hindon village where the community is reasonably well advanced in work on a "preferred options" consultation draft of its Neighbourhood Plan. CG Fry is working closely with Hindon's Neighbourhood Plan Group (NPG) in order to bring forward the site in which we have an interest (an Option Agreement). The site is located between East Street and the Chicklade and Chilmark Roads and is known either as "East Street" or "Chicklade Road". It lies immediately south of (and bordering) the Wessex Ridgeway public footpath network. The site is known to your authority as SHLAA site number 3157 and it is illustrated on the LPA's maps as a potential housing site along with two other SH LAA sites in the village. It is understood that, following its previous round of consultation, the two other sites have been dropped as potential sites by the NPG.</p> <p>CG Fry takes a close interest, as you would expect, in strategic planning, neighbourhood planning and development housing land supply issues, alongside economic, demographic and market issues. At the heart of what the LPA is seeking to achieve with the draft Site Allocations DPD lies the primary need to ensure that housing is delivered across the county in accordance with the Core Strategy and to ensure an appropriate level of housing delivery.</p> <p>Just this week, you will be aware that Central Government has once again highlighted its frustration with housing delivery and the way housing supply and demand figures are derived and used by local planning authorities. The Rt. Hon Sajid Javid MP's statement for DCLG last week described the way (housing) numbers work as simply not good enough.</p> <p>Turning to the LPA's draft Site Allocations DPD, it is noted that proposals revise existing settlement boundaries across the county to ensure the delivery of homes across the plan period in order to maintain a five-year land supply in each of Wiltshire's three Housing Market Areas, over the period to 2026. CG Fry is, however, concerned that:</p> <p>there is an underlying tension between the adopted Core Strategy and the consultation draft Site Allocations DPD insofar as the draft DPD proposes comparatively minor, and at times almost inconsequential settlement boundary changes for the Local Service Centres and Large</p>				

	<p>Villages. In our view, this approach is too shy, too restrictive and tightly-drawn resulting in inevitable constraint to and frustration of much-needed housing delivery right across the region;</p> <p>It needs to be borne clearly in mind that the adopted Core Strategy contains a settlement and housing strategy based on good evidence that was tested at public examination and, following all of that, maintained a green field housing requirement for the Tisbury Community Area (excluding Tisbury town). Much of that identified and tested need has yet to be fulfilled and there remains a significant residual requirement for the rural Tisbury area (that can realistically only be directed to Hindon, Ludwell and/or Fovant). That identified need cannot simply have evaporated and opportunities need to be explored more fully at Hindon and the other higher order settlements;</p> <p>there is a need for the document to take a bolder approach in general- it is too timid and conservative in its approach;</p> <p>if the settlements across the Housing Market Areas are constrained by an approach of tight preservation of existing settlement boundaries (effectively, 'development limits'), especially in the rural villages and swathes of the region affected by AONB designation, then much-needed and evidenced new housing of any meaningful quantum, will be stymied, and potentially redirected to larger settlements, to the detriment of the rural area;</p> <p>Paragraph 3.6 states that the Plan must identify a number of greenfield sites involving the loss of countryside in order to achieve Plan objectives. Land within settlements, in particular previously developed land, is acceptable for housing redevelopment, in principle. A realistic allowance is included for this source of new housing when calculating the scale of land supply. However, within a predominantly rural area, there is a limited amount of previously developed land (especially in more sustainable locations). Not only are such opportunities limited, they can also be difficult to rely on as a large proportion of overall supply. In our view, that position needs to be taken into account by a more emboldened approach to accommodating housing in the Local Service Centres and Large Villages; and</p> <p>Paragraph 6.7 states that neighbourhood plans submitted subsequently to the Site Allocations DPD will still be able to consider their own settlement boundary through the neighbourhood planning process. Your draft document states that once a future neighbourhood plan is 'made', its settlement boundaries will then supersede those in the Plan. In our view, that approach is too timid and comes as something of an after-thought in the way the consultation draft is worded. The important role that neighbourhood plans may have in ensuring housing delivery in the county ought to be highlighted at the core of the document - and it is certainly a key plank of planning for new housing, delivering housing numbers, driving growth and maintaining and promoting a thriving regional economy. The Housing Market Areas may well need to focus and rely upon neighbourhood planning, if new housing is to be achieved at anything like the numbers required.</p>
<p>Attached files (Please see Objective)</p>	<p>4749593</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3096	Consultee Unknown Unknown Society of Merchant Venturers	Agent Gareth Johns Savills	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 397800	Person ID: 1138537	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst we do not consider that the Plan is unsound, we would recommend that the Council identify reserve sites and include a policy mechanism to release reserve sites to respond to changed circumstances. This would make the Plan more robust. See Covering Letter for more information. Specifically, this representation is made in relation to our Client's interest at Devizes and 'Land to the north east of Roundway Park' ('the Site'). We have previously submitted the Site to the Council and it is acknowledged within the Strategic Housing Land Availability Assessment (SHLAA) as Site Ref: 549. The SHLAA confirms that the Site is 'suitable' for residential development for around 396 dwellings. See representation attached for a recommended reserve sites policy,				
Attached files (Please see Objective)	4749672				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3097	Consultee Mr Tim Northey Planning Manager Rectory Homes Limited Person ID: 893988	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The draft Wiltshire Housing Allocations Plan Wiltshire seeks to allocate new sites for housing across Wiltshire to ensure sufficient housing supply over the period to 2026. The plan has been developed in conformity with the Wiltshire Core Strategy (WCS) which requires Wiltshire to accommodate a minimum of 42,000 additional dwellings over the twenty year plan period.</p> <p>In Wiltshire, three separate housing market areas (HMAs) exist with housing delivery divided into the East Wiltshire HMA, North and West Wiltshire HMA and South Wiltshire HMA. Within these areas, the majority of growth is proposed at the defined principle settlements, market towns and local service centres, as set out at the Settlement Hierarchy at Table 2.2 of the draft plan. The next category below this is "large villages" where the proposed level of development is defined as "development limited to that needed to help meet the housing needs of settlements and improve housing opportunities, services and facilities".</p> <p>This draft plan contains an indicative distribution of housing requirements for the Community Areas at Table 2.3, and whilst it is stated that the vast proportion of housing needed over the plan period has already been built or is committed, the draft plan proposes a number of policies to allocate additional housing land. The level of housing proposed is not in excess of the minimum housing required in Wiltshire and allows for no buffer to ensure a flexible and competitive housing land market.</p> <p>A clear objective set out in the NPPF is that the planning system should significantly boost the supply of housing (Paragraph 47), however, the draft Wiltshire Housing Site Allocations Plan is not seeking to deliver in excess of its minimum housing requirements and includes no buffer in relation to housing land supply. In this respect, the plan is not fulfilling these requirements and hence is not considered to have been positively prepared. Furthermore, it should be highlighted that the Inspector in his report into the examination of the WCS allowed the plan to proceed to adoption but this was on the basis of an early review of the Core Strategy so as to re-assess housing requirements. To date, there has been no progress by the Council on a review of the WCS.</p> <p>As previously identified, this emerging plan states that the level of development at large villages should be enough to meet the housing needs of settlements and improve housing opportunities, services and facilities. The previously published Wiltshire Housing Site Allocations Development Plan Document (DPD) Initial Site Options, published in February 2015, had identified a housing requirement of 91 dwellings for the Marlborough Community Area (Eastern HMA) which comprises the large villages of Aldbourne, Baydon, Broad Hinton and Ramsbury. However, in the draft Site Allocations Plan no housing is proposed for allocation at these settlements despite in the case of the village of Ramsbury, an identified housing need exists.</p> <p>A Housing Needs Survey was undertaken by Ramsbury and Axford Parish in 2015 and the survey acknowledged that there had been no significant new development since the 1970s and hence the vitality and viability of the village is suffering as a result. The survey results confirmed that the majority of respondents (92%) are in support of new housing in Ramsbury and Axford whilst the most popular level of new homes to be provided in the Parish is for between 11-20 homes (36.1%). It also identified a need for housing of all tenures within the Parish with the need considered greatest in relation to affordable homes for young people (76.3%) and family homes for rent (48.1%), in the format of both</p>			

	<p>detached and semidetached housing. The survey showed that of the 22 households in need of housing, 18 would require public assistance in order to achieve their required housing and are therefore considered in 'housing need'.</p> <p>Since this survey has been undertaken, there have been no significant development proposals at Ramsbury and the Council's most up to date Housing Land Supply Statement (March 2017) identifies only 4 dwellings to come forwards at Ramsbury in the 5 year period 2016 - 2021, none of which would be affordable. The failure to identify any housing provision at Ramsbury in this emerging plan is therefore contrary to its identified settlement strategy in providing for development to meet their housing needs. This position is also at odds with provisions of the NPPF which states at paragraph 55 that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain rural areas". A continued policy approach of severe housing restraint will only continue to serve to challenge the vitality and viability of existing services and facilities at the village. The plan is not therefore considered consistent with national policy is not sound.</p> <p>Rectory Homes previously submitted a planning application for land at Newton Road, Ramsbury, which proposed 25 residential dwellings and included 40% (10 units) affordable housing provision. The application was refused by the Local Planning Authority and was the subject of an appeal (Ref: APP/Y3940/W/16/3156940) in 2017. Although dismissed, this was effectively due to the Council currently maintaining a 5 year housing land supply whilst the Inspector did not identify any adverse impacts that would preclude development on this site. This site (see attached accompanying plan) remains available, suitable and achievable for residential development and has been assessed by the Council in its evidence base (Site 1087 - Land rear of Penllyne) as suitable for residential development, subject to potential constraints. Its development offers the opportunity to deliver a high quality residential scheme that will make an important contribution towards Ramsbury's identified local housing need.</p> <p>In light of the above, we would respectfully request that it is considered for inclusion as an allocation in this pre-submission draft plan given the absence of any intention at the local level to prepare a Neighbourhood Plan, and so that it can ensure fulfilment of its own identified settlement strategy and to be consistent with National Policy so that the plan can be consider sound.</p> <p>As previously identified, the plan needs to aim to increase housing provision overall to ensure delivery of more than the minimum housing requirement in Wiltshire as a whole to provide a buffer and thus provide for competition in the market. The proposed growth strategy is wholly reliant upon the principal settlements but growth should be distributed to benefit all settlements and ensure their continued vitality. This includes making provision of housing sites at large settlements such as Ramsbury, where there is an identified housing need which can only be delivered through the development of larger sites if affordable housing is to be secured.</p>
Attached files (Please see Objective)	4743055
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To enable further exploration of the points raised in our submission before the examination Inspector.

Comment ID:	3098	Consultee Mr David Dulwich Person ID: 1126042	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.	Trowbridge				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This is my response to the Consultation Document relating to the Draft Wiltshire Housing Site Allocations Plan.</p> <p>COMMUNITY AREA TOPIC PLAN FOR TROWBRIDGE – JUNE 2017</p> <p>A. GENERAL COMMENTS</p> <p>Wiltshire Council’s guide to the consultation process states that a Government appointed Planning Inspector will be required to consider whether the plan is:-</p> <p>“Legally compliant,” to which I say I am not suggesting that it is unlawful; and</p> <p>To assess whether the Local Plan is “sound”, namely that it is (inter alia):-</p> <p>(i) “Positively prepared” – i.e. does it seek “to meet objectively assessed development and infrastructure requirements”. I believe the Planning Authority has sought to do that objectively, but I believe it has failed to achieve that outcome, as detailed below;</p> <p>(ii) “Justified – i.e. the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.” I also believe that the Planning Authority has failed on this test, as detailed below.</p> <p>B. EFFECT OF BREXIT</p> <p>The Wiltshire Core Strategy requirement of at least 42,000 new homes to be built between 2006 and 2026 has obviously been determined by reference to expected population trends over that period, based on projected births and deaths, and also net immigration predicted over that period. Just prior to the start date of the Core Strategy period eight new countries joined the EU in 2004, and the number of immigrants soared, with about half of the net total number coming from the EU at the time of the referendum.</p> <p>The UK is now in the process of leaving the EU, and a government White Paper has indicated that we will leave the single market, and freedom of movement will cease from March 2019. As a result net immigration from the EU of EU citizens coming to the UK to settle should reduce considerably, and the projected figures for house building will also start to reduce over the remainder of the period of the Core Strategy.</p> <p>I hope the Government will now start to consider this point and amend its planning policy relating to the expected figures for house completions by 2026 to reduce the figures over the whole country, including those for Wiltshire. I think it is a matter that Wiltshire Council should raise with Central Government of its own accord, before ever more green fields are paved over for housing which will not be required over the next 9 year period.</p> <p>C. BROWNFIELD SITES WITHIN TROWBRIDGE</p> <p>It is clearly unfortunate and misleading that the Community Area Topic Paper for Trowbridge makes no mention of brownfield sites within Trowbridge, particularly the former Bowyers site in view of its size, and the former West Wilts Council Offices.</p> <p>I note that the Wiltshire Council (June 2017) Topic Paper 2 – Site Selection Process Methodology mentions “In principle, brownfield sites carry a presumption in favour of development and establishing an allocation for development is unnecessary. Higher priority is accorded to developing brownfield sites.”</p>				

However, in practice this is not very helpful, because, as with any other prospective building site, the owner of the brownfield site must wish to develop the land, but often with higher associated costs to remove industrial and toxic waste for example. I accept that the owner of a brownfield site cannot legally be forced to develop his land for house building if he does not wish to do so, or if he does, at a time to suit any Council timetable. He might wish to have commercial premises on his land, which obviously makes it difficult to add a figure for house building on brownfield sites in total.

There is also a problem relating to a Victorian sewage system at the Bowyers site, a further possible costly deterrent to development until a full assessment of the potential of the site can be established, which may or may not include housing.

I understand it might be possible for the owner or the Council to seek a government grant for development of the former Bowyers site, but I have been informed by a Planning Officer that such grants are not very substantial, which obviously might lessen the incentive to build at the moment. Thus, I accept it is difficult to count on development of this site soon, however much the public of Trowbridge wish to see it developed. Nevertheless I still think it is remiss of the Council not to refer to brownfield sites in the Community Area Topic Paper for Trowbridge, because of the expectations of the general public noted in the press.

However, there is an application pending for housing on the former West Wilts Council offices, which might add to the quota required for Trowbridge.

D. INCLUSION OF SITES IN THE HOUSING SITE ALLOCATIONS PLAN

The Formal Pre-Submission document indicates that the Draft Plan proposes 800 dwellings in the Trowbridge area of its Housing Market Area (HMA), but only 80 in the Chippenham area. There is no explanation of this huge differential between these two Community Areas, despite the fact that they are both Principle Settlements in the joint North and West Housing Market Area. I presume these figures are the reason for the reference by the Wiltshire Times on 28/7/17 to the Site Allocation Plan choosing land that builds on greenfields and for putting 700 of the 900 houses planned for North and West Wiltshire in Trowbridge.

I will go into more detail about the selection criteria and the methodology of deciding whether sites are more sustainable, less sustainable or should be rejected later, but I would remind the Council that Trowbridge does have two particular problems which have an impact on whether land is suitable to build on. The first is a large Green Belt area to the whole of the north-west of Trowbridge to protect land between Trowbridge and Bradford-on-Avon. The other is a large bat population with roosting grounds in Biss Wood and Green Lane Wood, which has excluded building on three potential sites, covering a large area.

This means a lot of greenfield potential sites around Trowbridge cannot be used for housing. Building requirements therefore need to be reviewed for the Trowbridge Community Area. If the allotted quota of housing cannot reasonably be met in Trowbridge, Wiltshire Council has the power to redistribute the requirement to say Chippenham or other areas of Wiltshire, because it is a county plan which needs to deliver 42,000 new homes between 2006 and 2026, or perhaps less due to Brexit, over the whole county.

I would point out that it is not a reasonable response to the above difficulty for the Council to confirm the draft plan with sites that break the golden rule of the Core Strategy to keep Trowbridge and its satellite villages separated by open countryside, to protect the character and identity of these villages. Two of the six sites put forward would break that principle, namely Site 613 and Site 298. Site 3565 severely restricts the area of open country between Southwick and Trowbridge, but on a very rare heritage landscape which must not be lost. (Please see below)

If other areas of the county cannot fulfil Trowbridge's shortfall at present, the further identification of sites could be delayed because the Core Strategy still has until 2026 to run. The Council should also lobby the government regarding the likely effect of Brexit.

E. METHODOLOGY OF SELECTION OF PREFERRED SITES

The Consultation Document on the Draft Plan set out the process for selecting sites at settlements, which is derived from Wiltshire Council (June 2017) – Topic Paper 2: Site Selection Process Methodology. This sets out the various stages of the process of selection, which includes references to 12 sustainability objectives against which each site appraisal is set, to divide the sites into "more" or "less" sustainable site options. The objectives are set out in full in the Topic 2 Paper on the selection methodology.

I accept that the above part of the selection methodology is a reasonable way to assist the decision making process for the purpose of trying to achieve a standard objective approach to the assessment of the information relating to the various possible sites. It is likely to sustain objectivity between the various Planning Officers involved in the process.

However, the next part of the process, i.e. to score the various aspects of each site, I am not happy with, because of lack of transparency in some of the detailed analysis expected under the Topic Paper on the methodology. Under the heading "5. Stage 3: Sustainability Appraisal", the

paper states at 5.2 “The sustainability appraisal framework contains 12 objectives that cover the likely environmental, social and economic effects of development.” Under that is Table 5.1 Sustainability objectives, which lists the 12 objectives.

5.3 states – “The performance of each site has been assessed against each of the objectives using a set of decision aiding questions. Each option was then scored under each objective based on a generic assessment scale from major positive to a major adverse effect.” However, the set of decision aiding questions is not included in the Paper. This is a major omission because those questions are an important part of the decision making process for assessing examination of each of the objectives, which are themselves the main reason for the Sustainability Appraisal, which determines the outcome of whether the site is “more sustainable” or “less sustainable”. This leaves a lot of scope for an individual subjective assessment, which would not be transparent regarding the decision.

Under paragraph 5.3 the Generic Assessment Scale is set out. The Generic Assessment Scale refers to various options available to determine if the site option is likely to have an adverse effect or a positive effect. For instance it shows that a “major adverse effect” means “Option likely to have a major adverse effect on the objective with no satisfactory mitigation possible. Option may be inappropriate for mixed use development”. However, there are no examples on the face of the document of factors which might constitute a major adverse effect, or indeed, examples of what could amount to satisfactory mitigation.” Further scope for individual subjective assessments as a result.

Under “moderate adverse effect” as a further example, the scale states “Option likely to have a moderate adverse effect on the objective with difficult or problematic mitigation”, but again no assistance in defining what “difficult or problematic mitigation” could amount to in the balancing of the evidence available. The scale also deals with positive effects in a similar fashion.

The weight given to each item of information is crucial to the outcome of the decision, but not enough guidance is given to assist in the task at each step of Sustainability Appraisal which goes to the very heart of the final decision whether to include the site in the preferred sites for Trowbridge, but equally for any other site in Wiltshire to be added to the local plan. As a result each assessment is, in fact, subjective, depending upon which Planning Officer applies the Assessment Scale, and the weight he gives to each part of the information available.

On page 9 of the Wiltshire Housing Site Allocations Plan – Sustainability Appraisal Report there is some further advice under Assessment of Sites in relation to the use of the Generic Assessment Scale. It states “As a general rule of thumb, site options with five or more moderate adverse effects result in a site being considered ‘less sustainable’; and site options with four or less moderate adverse effects are considered ‘more sustainable’”. That is clearly aimed at reaching decisions objectively, but that did not save Site 3565 at Southwick Court from being chosen as a site for development, when it had five moderate adverse effects, together with a “range of minor effects”, and was considered ‘less sustainable’. The Council, through its officers, took a subjective view to ignore its own policy advice because the site would support the building of a large number of houses, identified as a major beneficial effect. That trumped the multitude of moderate and minor adverse effects completely.

This is clearly wrong in principle, and permits decisions inconsistent with the general methodology described in the Council document Topic Paper 2: Site Selection Process Methodology at 5.4, which claims “the appraisals used common evidence and the process therefore ensured a transparent, consistent and equitable comparison of all reasonable alternatives”.

The above points demonstrate the Draft Plan submitted is not “sound”, because it is not “positively prepared” or “justified”. It should not therefore be adopted.

F. COMMENTS RELATING TO FOUR OF TROWBRIDGE SITES INCLUDED FOR DEVELOPMENT

I would say at this point again that the Core Strategy states that open countryside should be maintained between Trowbridge and its satellite villages to protect the separate and distinct identities of the villages as separate communities, yet at three of the sites listed below this Core Strategy principle has been ignored.

SITE 3565 – LAND EAST OF THE A361 AT SOUTHWICK COURT

I have already referred to this application in paragraphs D4 and E8 above, in relation to matters of principle and the use of the Appraisal Methodology, but more information is needed to show that Site 3565 is categorically a glaring example of where not to build.

(a) The Assessment Results from the Sustainability Appraisal states there are five “moderate” adverse effects which have been identified. No explanation is given of why they are considered ‘moderate’, a deficiency of the appraisal methodology. In summary they are:-

(i) loss of habitat and disturbance to bats in the area; site options further than walking distance of Biss/Green Land Woods are a lower risk to bat activity, but require some mitigation (no information is given about what the mitigation would be);

- (ii) loss of best and most versatile agricultural land, “which would likely be problematic to mitigate” (It would be if you build on it!)
 - (iii) The need to build a local primary school and possibly secondary schools.
 - (iv) Southwick Court lies immediately to the south of the site which contains a number of important heritage assets (my emphasise) including a medieval moat, Grade II* listed farmhouse and a post-medieval water meadow system. The fields are open in character and exhibit a strong relationship with Lambrok Stream and Southwick Court.
 - (v) The site functions as a green infrastructure corridor (my emphasis throughout). Development would lead to an urbanising effect. Mitigation of landscape and visual impacts could be problematic.
- (b) Most people would think the above points were sufficient to ring alarm bells at the Sustainability Appraisal stage, especially the admission that the site contains a number of important heritage assets, which includes the water meadow system associated with Southwick Court, the loss of which would be problematic to mitigate in relation to the landscape and visual impacts. There is reference to the need for a Heritage Impact Assessment and an archaeological assessment to be obtained. Bearing in mind that the Council was aware of the obvious heritage importance of this site, you might think these reports would have been obtained at that stage and included with the Sustainability Appraisal rather than wait until a building application eventually is made if the site is included in the plan.
- (c) To add to the above problems the Assessment identifies a range of what were assessed as minor adverse effects, amongst which is a flood risk at flood level Zone 1. A Flood Risk Assessment would also be required because of the inter-relationship between surface water/fluviial flows into the River Biss Catchment. I would not consider this a minor adverse effect, because Lambrok Stream has overflowed on several occasions in recent years, with some gardens in Southwick flooded. I also know from my own experience of walking my dog on these water meadows both from the Southwick side and the Trowbridge side on an almost daily basis that all the fields very quickly become saturated because they are on clay and have poor drainage qualities, particularly the fields adjacent to Boundary Walk, Trowbridge which would be on the proposed site.
- (d) Not surprisingly the end result of the appraisal was a finding that the site is less sustainable in this area of search. Yet it was pushed forward to the next stage in the face of all the above problems/adverse effects because it would yield a large number of houses as a building site, despite contrary advice in the Housing Site Allocations Plan – Sustainability Appraisal Report, and it was added to the final list of sites.
- (e) The final assessment shown in Appendix G of the Community Area Topic Paper for Trowbridge.
- (i) This has alot more comments about the Historic Environment under that heading. The Council has obviously accepted the significance of this site, as it states “The Grade II* Listed Southwick Court Farmstead (and its setting) would need to be appropriately protected. A HIA would be needed in order to support and inform any subsequent development proposals. Bearing in mind the significance of this asset and the surrounding historic water meadows, the net development area of the site would likely need to be significantly reduced in order to accommodate appropriate mitigation measures..... The character of the area will therefore help to retain the high significance of this heritage asset”. This contradicts the Sustainability Appraisal Appraisal, where it states “mitigation of landscape and visual impacts could be problematic.” So the final assessment report is saying that mitigation is possible, even though the original report did not, and says the site would need to be significantly reduced to accommodate mitigation, without explaining what the measures of mitigation are, but is relying on the character of the site itself to retain the high significance of the site, which presumably means alot of mitigation measures are needed, but the beauty of the area will mask the damage to this heritages site which is going to occur. It is a bizarre argument, which I do not accept as reasonable.
 - (ii) Under the heading of “Landscape” it is stated “The site functions as a green infrastructure corridor, The fields are large and open in character and exhibit a strong relationship with Lambrok Stream (and its flood plain/Southwick Court/ ... In a wider sense, the site should be considered within the context of surrounding farmland and the Southwick Country Park which serve as a buffer between the Town and village of Southwick. Development of the land would therefore alter the area in terms of historic landscape character as the site of medium sensitivity to change. The land exhibits surviving and legible post-medieval water meadow features. Such features are considered to be rare and are often significant contributors to local landscape character.” (my emphasis)
 - (iii) Comment
 - (a) To which I would say – Is nothing sacred, as long as the Council can obtain a large area of building land! They are quite prepared to damage the historic character of this landscape, even though it is sensitive to change and rare at that. This is the outcome, even in the Council’s own words. Furthermore the character of Southwick Hall would be altered because of the altered landscape.
 - (b) Although no Heritage Impact Assessment has been produced by the Council in relation to Southwick Court and the surrounding landscape, the advice of Historic England(South West) Office was sought by the Planning Officer involved in a pending Panning Application

(17/03269/OUT) relating to land on the other side of these water meadows linked to Southwick Court, adjacent to Wynsome Street at Southwick. From Historic England's reply dated 26th April 2017 I have summarised their advice/comments regarding Southwick Hall and its environs. The author of the letter states that within the historic buildings list the buildings are referred to as "Southwick Court Farmhouse and Gatehouse and Bridge, a late 16th and early 17th century farmhouse and moated manorial farmstead" and referred to in the description as "of considerable importance", and that "the wider setting incorporates water meadows". The list adds "This connection of the manorial site and wider countryside context remains intact and is highly significant." (my emphasis). Historic England's reply adds "The significance of the water meadows, in my view, is partly supported by its landscape and visual relationship to the manorial centre. This relationship works both ways. The significance of the II* buildings is partly supported by their relationship with the historic landscape elements noted above. Encroachment by development upon the water meadows would result in an adverse change in setting to the manorial centre, leading to a loss of significance to the II* buildings. Essentially you would be losing some of their context". (my emphasis)

(c) THE IMPACT OF THE FLAWED APPRAISAL METHODOLOGY ON THIS SITE

(i) It is not possible to see from the appraisal reports why the five moderate adverse effects and range of minor adverse effects were labelled "moderate" and "minor" respectively. The methodology topic paper does not show how the hierarchy of adverse and beneficial effects has been calculated from the facts available to reach a conclusion, or a method of approach to establishing that aim, which is a crucial part of the appraisal system applicable to all sites.

(ii) Even if the Council did not have access to the letter from Historic England regarding this site (produced for another planning application), it is clear from the final assessment that this site is in a rare and significant historic landscape, which the Council has acknowledged, and would be altered in terms of its historical context, i.e. damaged, by any development on it, which cannot be mitigated by appropriate measures according to the Sustainability Appraisal (although the final assessment suggests it might be – another mystery of the methodology approach). In any event I would deem the heritage aspect of this particular site to be a major adverse effect on the objective, with no satisfactory mitigation possible, which would mean its removal from the list of possible sites. I also note here that the Council failed to follow its own advice outlined above in paragraph E8, by failing to acknowledge that by their assessment of a site option with five or more moderate adverse effects normally results in a site being considered "less sustainable".

(iii) The Council's decision is illogical, but I would suggest it is also irresponsible in view of the damage which they know will be inflicted on this historic and rare landscape, which is termed "highly significant" in the list relating to historic buildings. Such rare landscapes should be preserved intact, in much the same way as old trees are preserved under Tree Preservation Orders, for the benefit of future generations.

(d) My own perspective of Site 3565

(i) The Core Strategy principle of maintaining open countryside between Trowbridge and Southwick would be further eroded by this site being developed. The gap between the two on the A361 would be reduced to about 150 yards from the edge of the proposed site to the first houses on the ribbon development just within the boundary of Southwick.

(ii) There is already a 12.5 hectare Solar Park adjoining a proposed housing development on land adjacent to Wynsome Street, Southwick. There would only be a very thin strip of land left between the pending application off Wynsome Street, if granted, and the solar park combined, before reaching the southern border of site 3565. That border would come extremely close to Southwick Court, destroying its open aspect in the surrounding water meadows and seriously impacting on the historical context of the Grade II* listed manorial centre, as observed by Historic England. Any screening by tree planting along the southern border of site 3565 would take years to grow, and would not diminish the loss of land so close to Southwick Court in any event. Site 3565 is a large parcel of land, which, even if it were not an historic and rare landscape, would be a large area of open countryside to be lost between Trowbridge and Southwick, to the detriment of the principle of separation of Southwick and Trowbridge, but also North Bradley as well.

(iii) I would add that access, for public use, to open countryside in agricultural use, closely adjoining villages and towns, which is easily accessible via existing ancient footpaths, is a community benefit which is essential for local residents' mental and physical wellbeing. This is well documented fact, which fits with the principle of open countryside between settlements being maintained. There are lots of footpaths over these water meadows, which are very well used by dog owners, including my wife and I, and families with children, and people walk between Southwick and Trowbridge over the footpaths rain or shine on a regular daily basis, as well as connecting North Bradley to this open area in the same way. The area serves three communities, and any further loss of this attractive open water meadow landscape would be a great loss to a lot of people. This rare landscape should be preserved for future generations and not be developed for housing.

(iv) The Council's cavalier decision does not stand up to common sense scrutiny, or to scrutiny under the unsound appraisal system relating to sustainability. It demonstrates the misuse of the appraisal methodology, which in turn demonstrates that the draft plan is not sound. This site should be rejected for future development.

2. SITE 3260 – UPPER STUDLEY

(a) This site is clearly part of the water meadows associated with Lambrok Stream and Southwick Court, from the description in the final appraisal document in Appendix G of the Trowbridge Topic Paper.

(b) All that I have said about Site 3565 i.e land at Southwick Court applies equally to Site 3260. It is part of the open field system and water meadows surrounding Southwick Court, and should also have been rejected during the selection process for the same reasons applicable to Site 3565.

(c) It is also part of the rural buffer zone between Trowbridge and Southwick, one of the main principles of the Core Strategy. It should remain part of that rural buffer, as part of the greater heritage landscape surrounding Southwick Court, which is very rare, and increases its significance.

3. SITE 613 – ELM GROVE FARM (INCORPORATING SITE 248)

(a) Site 613 is at present a rural buffer zone between Trowbridge and North Bradley, and Drynham Lane which adjoins it is a quiet rural country lane, bordered by mature hedgerows on both sides, containing numerous mature trees. There are two fields about halfway along its length, with trimmed hedgerows completely enclosing them, which are sometimes used for grazing of sheep, opposite a small enclave of houses on the opposite side of Drynham Lane with back gardens up to the boundary of one edge of White Horse Business Park. Part of the lane is bordered by the railway line, which acts as a natural boundary to the area, with its own hedgerow area. Also site 248 (now incorporated into site 613) has frequently been used to graze cows, which can be seen through the gateway.

(b) Consequently, the whole of Drynham Lane has a rural feel to it; partly because of the rural setting of hedgerows, but also because around two sides of one of the fields used for sheep the road, which is single track, has not been formally adopted, and is unsurfaced. This means there is very little through traffic to and from the A363. As a result the road is very quiet, with very little traffic other than vehicles very occasionally driving to and from the small housing enclave of about 7 houses, from the Dursley Road end of Drynham Lane. There are also occasional lorries from the same direction taking materials to a reclamation yard just beyond and under the railway bridge.

(c) As a consequence of the above conditions many local people use Drynham Lane as a safe place to cycle, road run, walk their dogs and walk along Drynham Lane to the footpath along the edge of the railway line to White Horse Business Park (presumably to work and home). This is why it serves so well as a rural buffer zone on the edge of Trowbridge and between Trowbridge and North Bradley.

(d) This is why I take issue with the description the Sustainability Appraisal uses, stated to be a "minor" adverse effect, namely "Whilst the loss of greenfield land would alter the character and appearance of the site and introduce a moderate urbanising effect to the south-west of Trowbridge, such impacts would be tempered through appropriate mitigation measures designed to bolster greenspace/habitat connectivity", whatever the mitigation measures mean in plain English, rather than "planning speak". Any documents used for consultative purposes should be understood by the man the street, with explanations if the purpose is unclear.

(e) The results of using this site for development would certainly not be a moderate urbanising effect. Once again the methodology of the appraisal scheme calls into doubt the description of "moderate", and how that "urbanising effect" could be considered a "minor adverse effect" in relation to this particular site again calls the appraisal methodology into doubt.

(f) The loss of the two fields to housing opposite the small existing enclave, where sheep are sometimes grazed, would completely destroy the rural aspect of Drynham Lane because of the loss of the open area behind the trimmed hedgerow at that point, especially if as mentioned in the final Appendix G assessment that "upgrades", presumably meaning widening of the road and adoption of the unsurfaced section, would be required to Drynham Lane for a new access onto the A363, and that a bus lane should be included. To allow two buses to pass on Drynham Lane would require considerable widening of this single track road, which would mean the destruction of large sections of hedgerows down its whole length, or most of it, depending where access to the A363 is gained.

(g) As stated in (d) above the loss of greenfield land would definitely alter the character and appearance of the site, but to call this "a moderate urbanising effect to the south-west of Trowbridge" is a complete misnomer. The area around Drynham Lane would lose its rural aspect by the loss of land, but also the loss of a lot of hedgerow for widening, and would cease to be a country lane i.e Drynham Lane itself, and the activities for which it is now used would be impossible, because it would become much busier. This aspect of the change in use would be exacerbated,

because Drynham Lane would be used as a regular shortcut from County Way to the roundabout at Spitfire Retail Park, via Dursley Road, to miss heavy traffic on Bradley Road, which is bolstered by vehicles using the B+Q site and Spitfield Retail Park itself.

(h) I would again call into question the appraisal methodology regarding this being defined as a “minor adverse effect”. It would completely change this quiet rural corner of Trowbridge into a major road, with loss of a lot of hedgerows and loss of its present non-vehicular use, as well as destroying a lot of greenfields.

(i) I also fear for the protected wildlife species mentioned in the final Appendix G assessment, namely Great Crested Newts, Grass Snakes and various species of protected bats. The Sustainability Appraisal states that hedgerows and trees are significant in the landscape, and provide wildlife corridors linking habitat features within White Horse Business Park and neighbouring land, should be retained, protected and enhanced. If Drynham Lane is widened considerable areas of hedgerow along the length of the road will be destroyed, and to replace it elsewhere on the site with the equivalent mature growth including trees, would take years of growth. Meanwhile what is the effect upon the wildlife?

(j) Another very important issue, which has been ignored by the Council in the Draft Plan, is the first guiding principle of Core Policy 29 that the villages around Trowbridge, which all have separate and distinct identities, must be protected by maintaining open countryside between them. This principle has been ignored because Site 613 joins North Bradley to Trowbridge on the A363 Bradley Road at the Spitfire Retail Park roundabout, as shown by road signs each side of the roundabout, one stating North Bradley and the other Trowbridge. Site 613 is also outside the Trowbridge Settlement Boundary.

(k) This situation is exacerbated further by the inclusion of Site 298 in the Draft Plan as a more sustainable site, which immediately abuts Site 613 across the A363 at White Horse Business Park, and on its western edge also, immediately abuts the settlement boundary of North Bradley. That would therefore leave no open countryside at all between Trowbridge and North Bradley.

(l) I will say more about Site 298 below, but Site 613 ie Elm Grove Farm should be rejected as a site for development in the Draft Plan for the reasons stated above.

4. SITE 298 – LAND OFF A363 – WHITE HORSE BUSINESS PARK

(a) This site once again breaks the principle under the Core Strategy of leaving open countryside between Trowbridge and its satellite villages, but worse still seems to be a cynical attempt to artificially move the existing boundary of Trowbridge along its southern edge.

(b) The Sustainability Appraisal Assessment states “(this site) Although essentially situated on the very edge of the town, access to local/town centre services and facilities would be achievable via bus services available along the A363/Bradley Road.” In the final assessment under Appendix G that has become “The site is situated in an accessible location on the edge of the town.” These statements are not correct because, using a 2 ½ inch Ordinance Survey map, at present the southern edge of Trowbridge follows the civil parish boundary of Trowbridge, which abuts Boundary Walk in Trowbridge (not surprisingly), next to Site 3565, and continues east along the northern edge of site 613. So even site 613 is beyond the edge of the present town and settlement boundary of Trowbridge. The impression given is that Site 298 is within Trowbridge town itself ie inside the settlement boundary, but right up to the outer edge of it, yet still inside the settlement boundary.

(c) In fact Site 298 is completely outside Trowbridge settlement, within the civil parish of North Bradley (still using the Ordinance Survey map) and is directly adjoining North Bradley and the settlement boundary of North Bradley. It would be joined onto North Bradley village and, to all intents and purposes, would be part of North Bradley village. The allocation of this site in the Plan is despite paragraph 2.10 of the Community Area Topic Paper for Trowbridge, which states as follows. “When considered in the light of Table 2.2, the issues relating to the supply of housing are focused on the town itself.” (meaning Trowbridge). The Large Villages in the Community Area have already delivered more than was expected and hence there is no need to look at these areas for the purpose of allocating land for housing.”

(d) So, North Bradley has already delivered its share of building land, yet site 298 is really being added to North Bradley, not Trowbridge, since the site is in the civil parish of North Bradley and is joined directly onto North Bradley village, and it is certainly not part of Trowbridge as matters stand at present. In other words the boundary of Trowbridge has been artificially moved by the Council to allow building in an area where there is not expected to be any more house building, namely North Bradley.

(e) The final Assessment in Appendix G confirms the reality of the situation by stating under the heading “Landscape” – “The site is characterised in landscape terms by a distinctive pattern of mature and semi mature hedgerows and trees. The land also helps provide a setting for the village of North Bradley. Any subsequent layout should retain these important features and provide additional landscape scale planting with mature species to ensure the identity of North Bradley, as a separate village is strengthened”. But it will not be strengthened because this will not be open countryside as deemed by the Core Strategy, and will be associated with North Bradley, because in reality it will be part of North

	<p>Bradley. The identity of North Bradley as a separate village would not have been an issue if the Council had not added Site 298 to its Draft Plan. This is adding building to North Bradley by the back door.</p> <p>(f) Thus Site 298 should also be rejected for the reasons stated above. In addition, it follows that if Site 613 is rejected then Site 298 should also automatically be rejected, because of what is stated in the Consultation document on the Draft Plan about the Core Strategy regarding settlement boundaries. It states: - "In simple terms a "settlement boundary" is the dividing line or boundary between areas of built/urban development (the settlement) and non-urban or rural development – the countryside. In general, development within the boundary is in principle acceptable, whereas development outside the boundary with limited exceptions, is not acceptable."</p> <p>(g) Site 298 is outside the settlement area of Trowbridge, and should therefore expect to be rejected in the above circumstances. This applies equally to Site 613, but the juxtaposition of both these sites exacerbates the problem, and completely closes the gap or buffer between Trowbridge and North Bradley. This demonstrates that Wiltshire Council is getting more and more desperate in its search for areas to build on around Trowbridge, and making unacceptable decisions to achieve it. There should now be a pause, to give time to think more rationally about the issue, because the Plan period does not expire until 2026.</p> <p>G. SUMMARY OF CONCLUSIONS</p> <p>I believe four out of the six draft allocations for Trowbridge should be rejected and removed from the list of sites for the various reasons given above, but also in particular, because the methodology process used for the allocation is not "sound". It is not sound because it is not "positively prepared" because the strategy fails to meet objectively assessed development and infrastructure requirements. It also cannot be "justified" because it has failed to produce the most appropriate strategy when considered against the reasonable alternatives.</p> <p>I believe it has been shown that Trowbridge cannot justifiably provide the number of building sites required to provide the housing allocation given within the Wiltshire Core Strategy. In these circumstances the Planning Authority should look elsewhere in the county for extra provision to comply with the central government requirement of 42,000 new homes, since it is operating on a county basis.</p> <p>In addition Wiltshire Council should lobby the Government now, to consider a reduction of national quotas for each county because of the likely reduction in requirements for housing as a result of Brexit.</p> <p>There should also be a pause in relation to the planning allocation for Trowbridge regarding the short fall in sites at present, to see what transpires on the Ashton Court Urban Extension strategic site regarding further planning permissions, because the Plan period does not expire until 2026.</p>
<p>Attached files (Please see Objective)</p>	<p>4743598</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3099	Consultee Waddeton Park Ltd Person ID: 1137560	Agent Miss Felicity Tozer Senior Planner Savills Person ID: 1137556	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Housing Need and Delivery: Approach of the HSAP</p> <p>The adopted Core Strategy (CS) requires the delivery of 24,740 dwellings within the North West HMA over the plan period to 2026. As confirmed by Core Policy 2, and the CS Inspector, these numbers are minimum housing requirements, and provide a flexible and positive basis to provide for the needs of the area (#40, IR December 2014).</p> <p>Topic Paper 4 – Developing Plan Proposals (June 2017) ('TP4') confirms that given the difficulty in predicting rates of development with a high degree of certainty, and the current issues with delivery on large mixed use sites within Wiltshire, that the Council feel "it is prudent to look beyond the required minimum to achieve a five year housing land supply and ensure a continuity of housing supply, as well to help ensure choice and competition in the market" (#1.5). Whilst this principle is agreed, it is important to consider this alongside the fact that the requirements are minimums, and thus even if a five year housing land supply (5HLS) was secure, this should not preclude the identification of additional housing allocations where this would result in sustainable development and meet the broad objectives of the Framework to boost housing delivery (#497) and provide flexibility to adapt to rapid change (#74).</p> <p>In this respect, it is material to note that the recently published consultation, 'Planning for the right homes in the right places', proposes a national methodology for the calculation of housing need. Wiltshire's Local Plan Review has commenced, and this will be captured by the changing national guidance. This indicates that the annual housing requirement for Wiltshire is likely to increase from 2,100 dwellings per annum; to 2,227 dwellings per annum¹. The Local Plan Review should therefore allow for an increase in housing delivery above the minimum CS requirements over the remaining plan period, and as such, the inclusion of a housing land supply buffer represents an effective way of ensuring that the Council is able to transition smoothly to the anticipated increased requirement and to continue to demonstrate a deliverable housing land supply moving into the Local Plan Review.</p> <p>The North West HMA has been unable to consistently demonstrate a 5HLS since adoption of the Core Strategy; with the supply fluctuating regularly. This is emphasised by the reliance upon large strategic sites to meet the housing requirements, and the delay in a number of these coming forward in a timely manner. The shortfall in delivery over the plan period to date is demonstrated by the simple analysis of the housing requirement versus completions: (See attached Table 1)</p> <p>Over the first ten years of the plan period, the North West HMA has a 614 unit shortfall. This is significant, both in respect to absolute housing delivery, but also as a result of the associated failure to deliver affordable housing.</p> <p>In terms of housing land supply moving forward, TP4 confirms that against the Council's current housing land supply assessment, that the North West HMA will fail to demonstrate an adequate housing land supply (referenced by 5HLS) from 2024/25 (see Table 2.3); with a progressive decrease in supply from the Council's current estimate of 6.62 years.</p> <p>It is important to note that the Council's purported housing land supply is being challenged, with detailed evidence recently made to a conjoined s78 public inquiry contending that the actual housing land supply for the North West HMA falls between 3.29-4.35 years². The outcome of this</p>				

Inquiry, and the publication of the Council's fully updated (to 2017 base date) housing land supply evidence, will be available prior to the Examination of the dHSAP, and as such, we do not undertake a detailed 5HLS assessment for the purposes of these representations. However, in light of the above, this adds emphasis to the need to ensure that draft allocations are identified to be delivered in the short/medium term. The 'resilience testing' undertaken by the Council, as set out at #2.11 TP4, and the recognition that there have been, and continue to be issues with delivery of larger strategic sites within the plan area is supported. The delay with the delivery from large sites is an important component identified in the current challenges to the 5HLS, and as such, the identification of sites which are able to come forward with minimal 'obstacles' to delivery will provide a crucial element in maintaining supply moving forward. This is also evident when reviewing the Council's trajectory (p26, TP4), which requires a significant increase in delivery of units from 2019-2022:

(See attached Figure 2)

Trowbridge is the 'Principal Settlement' within the North West HMA, and identified as the key location for growth over the plan period. The adopted CS is based upon a vision predicated upon sustainable patterns of development focussing on the settlement hierarchy (IR, #16). Trowbridge is identified as a location to support the delivery of 6,810 dwellings over the plan period; which as identified by Core Policy 29 seeks to strengthen its role as the principal service centre, whilst delivering a balance of housing and employment opportunities in association with improved infrastructure.

The dHSAP confirms that the only CS strategic allocation within Trowbridge, Ashton Park, is failing to deliver the quantum of development initially anticipated within the CS. Ashton Park was previously anticipated to deliver 2,600 dwellings by 2026; however, this has fallen to 1,600 within the plan period (#5.24, TP4). However, it is noted that this number is predicated on delivery commencing in 2019/20, which is unlikely given that the outline planning application is still pending.

Trowbridge's housing land supply is identified below:

(See attached Table 3)

This results in a requirement to identify additional site allocations for the town of 2,020 units to meet the adopted CS requirement. The dHSAP identifies six draft allocations providing for an indicative 800 units (draft Policy H2).

This results in a shortfall in housing delivery within Trowbridge of 1,220 units; which at the adopted CS Policy 43, would include 366 affordable units.

This shortfall is significant and, when considered against Trowbridge's role as the Principal Settlement, emphasises the importance of the six draft allocations in delivering the needs of the town, and that the allocated land should be efficiently delivered to increase delivery of units as appropriate based upon the site specific constraints.

Waddeton Park disagree with the Council's Sustainability Appraisal in relation to Site 3565, discussed further below, but in principle support the Council's position that the identified housing need and the scale of the shortfall within Trowbridge is exceptional.

1 CLG: Application of Proposed Formula for Assessing Housing Need, with contextual data (published 14th September 2017)

2 APP/16/3162997: 3.29 utilizing Sedgfield+20% and 4.35 utilizing Liverpool+5%

Introduction

These representations have been prepared and submitted by Savills on behalf of Waddeton Park Ltd ('Waddeton Park') in response to Wiltshire's draft Housing Site Allocation Plan (dHSAP) and supporting evidence base.

Waddeton Park support the production of the dHSAP, and the Council's proactive approach to identifying housing sites to meet the housing needs and associated infrastructure of the area over the remaining plan period. The allocation of sites represents the most effective strategy in ensuring the delivery of long term sustainable development across the plan area.

The adopted Core Strategy sets the overriding framework for the HSAP; identifying the requirement to deliver 42,000 homes over the plan period 2006-2026. These are disaggregated into three housing market areas (HMA), and subsequently to individual settlements or rural areas within the local area strategies. This representation relates to the 'North West HMA', and specifically the settlement of Trowbridge.

Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.

In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this

representation, and provide further detail beyond the Council's site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.

The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.

The production of an effective, deliverable and positively prepared HSAP will not only provide a solid foundation for tackling the housing crisis but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the HSAP submitted for examination is sound. Consistent with the National Planning Policy Framework (the "Framework") (March 2012), to be sound, the HSAP must be:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

It is recognised that as part two of Wiltshire's Local Plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore only considered as appropriate within this representation.

Conclusions and recommendations

Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.

The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.

Notwithstanding the 'ranking' of the sites, the significant residual housing requirement for Trowbridge, combined with its role as a Principal Settlement, alongside the inclusion of a primary school to meet an identified urgent need, demonstrates the exceptional circumstances currently pressing on the need for development sites within the town; and demonstrates that the public benefits of development on the allocation site are significant for the purposes of paragraph 134.

It is recognised that the Council are intending to submit the dHSAP to Examination in early 2018, and the intention to proceed with the Plan expediently is supported. Should the Council wish for a greater degree of certainty in respect to the development proposals discussed within this Representation, we would welcome the opportunity to discuss the drafting of a Statement of Common Ground for submission to the Examination process, identifying potential modifications to the draft allocation policy, for the Inspector to consider.

These could include the allocation policy identifying the requirement to deliver a primary school on site and a new pedestrian access to Southwick Country Park. It would also provide an opportunity to provide a greater level of detail on the allocation plan; for example, identifying the location of woodland planting along the southern and western edges, the extent of the northern wildlife corridor, and the extent of the area on the western side (as demarcated by the former water meadows) which should be identified as informal or formal green space.

Attached files (Please see Objective)

4743725 / 4743735 / 4743734 / 4743724 / 4743732 / 4743723 / 4743733

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

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				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Assessment: Site 3565 The draft allocation, H2.6 is supported by a site assessment (Table G.9, Trowbridge Community Area Topic Paper) and the Sustainability Appraisal (Table F.15, <i>ibid</i>).</p> <p>The site assessment represents the starting point for the allocation process, and as such, we comment on this below. These comments are informed by our emerging evidence base for the development site, and the draft Concept Plan (Appendix 2).</p> <p>Accessibility We support the conclusions of the assessment, which confirm that the site is sustainably located on the edge of the town, with the ability to connect with local services and facilities to the north. There a range of facilities in the immediate locality, including a post office and convenience store (circa 600m), public houses (circa 240m and 620m) and Spitfire Retail Park which has a range of retail units (circa 800m). These are accessed to the north of the allocation site, and there are a number of opportunities for new and improved pedestrian and cycle links into the existing development to the north; as illustrated on the Concept Plan.</p> <p>The vehicular access from the A361 is shown on the Concept Plan. A draft drawing for the access junction has been issued to Wiltshire Highways through the pre-application process, and they have agreed to the arrangement of the junction in principle, and provided some technical comments which Waddeton Park’s highways consultant is working to address. Whilst the application drawing is therefore likely to change, the principle of the ghost island access junction will remain.</p> <p>In addition, the emerging proposals include a new pedestrian link across the A361 connecting to Southwick Country Park, providing a key element of any future strategic green link, and responding to the draft Habitat Regulations Assessment (dHRA) which seeks to emphasis the role of this recreation facility. A route within the site is also provided to access the existing bus stop on the A361.</p> <p>There a number of bus stops in the immediate vicinity, including Marston Road (circa 270m), the A371 (circa 540m) and A363 (circa 800m), which provides services for routes 60, X34, 94, 185, 67, 81, 87/87A, and 265. These provide a circular route serving Trowbridge (hourly), alongside half hourly services to Chippenham, Frome, Bath, Salisbury and Warminster, and locations along the route.</p> <p>Introduction The adopted Core Strategy sets the overriding framework for the HSAP; identifying the requirement to deliver 42,000 homes over the plan period 2006-2026. These are disaggregated into three housing market areas (HMA), and subsequently to individual settlements or rural areas within the local area strategies. This representation relates to the ‘North West HMA’, and specifically the settlement of Trowbridge.</p> <p>Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.</p> <p>In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this</p>				

representation, and provide further detail beyond the Council’s site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.

The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.

The production of an effective, deliverable and positively prepared HSAP will not only provide a solid foundation for tackling the housing crisis but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the HSAP submitted for examination is sound. Consistent with the National Planning Policy Framework (the “Framework”) (March 2012), to be sound, the HSAP must be:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective– the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

It is recognised that as part two of Wiltshire’s Local Plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore only considered as appropriate within this representation.

Conclusions and recommendations

Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.

The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.

Sections 2 and 3 have considered the range of matters which have been considered as part of the site allocation process. The sustainable location of the site, and the accessibility of local services and facilities is clear; and the ability of the site to deliver housing to meet the significant residual shortfall within Trowbridge, a Principal Settlement, is acknowledged.

Waddeton Park’s emerging evidence base on the site’s ecological, landscape and heritage baseline, and the ability to further refine development proposals for the site has enabled a more comprehensive assessment of the potential impacts and enhancement opportunities of development on the site.

Accessibility: the site is sustainably located on the edge of Trowbridge, a Principal Settlement, and has a significant range of local services and facilities within walking and cycling distance. In addition, the existing public transport services available for future residents provides regular and frequent bus services around Trowbridge, and to the key destinations of Bath, Frome, Chippenham, Salisbury and Warminster. There are a significant number of opportunities to enhance existing pedestrian linkages into the residential area to the north, and as identified on the Concept Plan, opportunities for creation of a new pedestrian crossing to Southwick Country Park.

It is recognised that the Council are intending to submit the dHSAP to Examination in early 2018, and the intention to proceed with the Plan expediently is supported. Should the Council wish for a greater degree of certainty in respect to the development proposals discussed within this Representation, we would welcome the opportunity to discuss the drafting of a Statement of Common Ground for submission to the Examination process, identifying potential modifications to the draft allocation policy, for the Inspector to consider.

These could include the allocation policy identifying the requirement to deliver a primary school on site and a new pedestrian access to Southwick Country Park. It would also provide an opportunity to provide a greater level of detail on the allocation plan; for example, identifying the location of woodland planting along the southern and western edges, the extent of the northern wildlife corridor, and the extent of the area on the western side (as demarcated by the former water meadows) which should be identified as informal or formal green space.

Attached files (Please see Objective)

4743735 / 4743734 / 4743733 / 4743732

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	3101	Consultee Waddeton Park Ltd Person ID: 1137560	Agent Miss Felicity Tozer Senior Planner Savills Person ID: 1137556	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Assessment: Site 3565 The draft allocation, H2.6 is supported by a site assessment (Table G.9, Trowbridge Community Area Topic Paper) and the Sustainability Appraisal (Table F.15, <i>ibid</i>).</p> <p>The site assessment represents the starting point for the allocation process, and as such, we comment on this below. These comments are informed by our emerging evidence base for the development site, and the draft Concept Plan (Appendix 2).</p> <p>Biodiversity</p> <p>A full suite of ecology surveys have been undertaken on the allocation site, including: Phase 1 Habitat Survey, bat activity surveys and static detector surveys alongside systematic surveys for badgers, otters and water voles. These surveys have confirmed that there are no ecological features or protected habitats which would preclude development of the allocation site.</p> <p>It is recognised that consideration must be given as to how development on the allocation site responds to the potential for housing developments within the area to have adverse effects on the Bath and Bradford on Avon Bats Special Area of Conservation (SAC).</p> <p>The draft Habitats Regulations Assessment (dHRA) of the dHSAP has determined that the allocation site would not have likely significant effects on its own, but could have an in-combination effect with other housing sites through increased recreational pressure on more sensitive woodland to the east of Trowbridge: where the SAC bats' roost.</p> <p>The allocation site is outside of any recognised Core Areas (which are defined in the Wiltshire Council's guidance note on planning applications and the SAC), but recent evidence shows there is a possibility of them being used by Bechstein's bats. A tree roost has recently been discovered in a tree on the northern edge of Southwick Country Park, and they are likely to forage and commute through the landscape around their roosts. Habitats within and around the allocation site that are potentially important for SAC bats include streams and hedges around field boundaries, mature trees with roosting potential, the moat and buildings within the Southwick Court complex, and Axe and Cleaver Lane on the eastern boundary.</p> <p>The emerging development proposals, illustrated on the Concept Plan, have been informed by a full season of bat surveys carried out between April and October. Whilst the surveys did not detect Myotis bats in large quantities (relative to the other bat species that were recorded), it is possible that some of these recordings were of Bechstein's bats. The surveys included walked routes across the fields as well as routes along the boundaries. As might be expected, the vast majority of activity was recorded along field boundaries, with relatively little activity recorded over open fields. Where there was activity over open fields it was mostly of the larger bat species (noctules and serotines). There are several mature trees with potential roosting features, but no tree roosts were recorded (although it is acknowledged that bats can move between tree roosts frequently and seemingly unoccupied sites may support a roost).</p> <p>The field boundaries are largely tall hedgerows with mature trees, which provide high quality foraging and commuting habitat for bats. A lighting survey of the allocation site showed that there is little light pollution, except in locations along the site's northern boundary where it adjoins the</p>				

existing adjacent development and a streetlit road. The open fields are species-poor and agriculturally improved, but the fact that they are grazed by cattle enhances their quality for foraging bats.

One of the first principles embedded into the design strategy was the provision of dark, landscaped buffers along the retained hedgerows and field boundaries. These are at least 10-16 m wide and cover all of the important features identified in the SCOPS and through field surveys. Where the main access road passes through hedgerows, it has been sited to minimise habitat loss and the emerging lighting strategy avoids illumination at these sensitive points by street lights. In addition to the landscaped buffers, the emerging development design offers large areas of habitat creation to the south to benefit bats and other wildlife. This area includes provision for woodland planting, open grassland and ponds. The emerging proposals include significant areas of green recreational space, above the Council's usual policy standards. This ensures that the allocation site provides additional opportunities to support recreational activities. The Concept Plan confirms the opportunities to link with existing PROWs and informal recreation routes within the locality, and confirms the provision of a new pedestrian link across the A361, providing a direct link into Southwick Country Park. As confirmed in the dHRA, these measures represents a key objective in directing recreational pressure to Southwick Country Park, with the proposals on the allocation site providing an opportunity to improve a number of the elements identified as opportunities for improvement within Figure 6 of the dHRA.

The design responds appropriately to the constraints and opportunities related to bats and meets the requirements set out for the dHRA presented in the dHSAP). The full set of technical information to be submitted with the application will enable the Council to complete their Habitats Regulations Assessment of the planning application.

Introduction

The adopted Core Strategy sets the overriding framework for the HSAP; identifying the requirement to deliver 42,000 homes over the plan period 2006-2026. These are disaggregated into three housing market areas (HMA), and subsequently to individual settlements or rural areas within the local area strategies. This representation relates to the 'North West HMA', and specifically the settlement of Trowbridge.

Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.

In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this representation, and provide further detail beyond the Council's site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.

The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.

The production of an effective, deliverable and positively prepared HSAP will not only provide a solid foundation for tackling the housing crisis but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the HSAP submitted for examination is sound. Consistent with the National Planning Policy Framework (the "Framework") (March 2012), to be sound, the HSAP must be:

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It is recognised that as part two of Wiltshire's Local Plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore only considered as appropriate within this representation.

Conclusion and recommendations

	<p>Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.</p> <p>The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.</p> <p>Sections 2 and 3 have considered the range of matters which have been considered as part of the site allocation process. The sustainable location of the site, and the accessibility of local services and facilities is clear; and the ability of the site to deliver housing to meet the significant residual shortfall within Trowbridge, a Principal Settlement, is acknowledged.</p> <p>Waddeton Park's emerging evidence base on the site's ecological, landscape and heritage baseline, and the ability to further refine development proposals for the site has enabled a more comprehensive assessment of the potential impacts and enhancement opportunities of development on the site.</p> <p>Ecology: a full suite of ecological surveys have been conducted, and these have raised no significant constraints to development on the allocation site. The emerging Concept Plan confirms that the mitigation measures identified within the dHRA can be accommodated on the allocation site.</p> <p>It is recognised that the Council are intending to submit the dHSAP to Examination in early 2018, and the intention to proceed with the Plan expediently is supported. Should the Council wish for a greater degree of certainty in respect to the development proposals discussed within this Representation, we would welcome the opportunity to discuss the drafting of a Statement of Common Ground for submission to the Examination process, identifying potential modifications to the draft allocation policy, for the Inspector to consider.</p> <p>These could include the allocation policy identifying the requirement to deliver a primary school on site and a new pedestrian access to Southwick Country Park. It would also provide an opportunity to provide a greater level of detail on the allocation plan; for example, identifying the location of woodland planting along the southern and western edges, the extent of the northern wildlife corridor, and the extent of the area on the western side (as demarcated by the former water meadows) which should be identified as informal or formal green space.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3102	Consultee Waddeton Park Ltd Person ID: 1137560	Agent Miss Felicity Tozer Senior Planner Savills Person ID: 1137556	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Assessment: Site 3565 The draft allocation, H2.6 is supported by a site assessment (Table G.9, Trowbridge Community Area Topic Paper) and the Sustainability Appraisal (Table F.15, <i>ibid</i>).</p> <p>The site assessment represents the starting point for the allocation process, and as such, we comment on this below. These comments are informed by our emerging evidence base for the development site, and the draft Concept Plan (Appendix 2).</p> <p>Historic Environment</p> <p>The site assessment identifies two key heritage assets one within, and one near to the allocation site. The undesignated former water meadows lie within the western part of the allocation site, and the Grade II* Listed Southwick Court farmhouse, and the separately listed gatehouse and bridge lie outside of the allocation site. The site assessment correctly takes a precautionary approach to development on the draft allocation in light of these heritage assets, and requires a Heritage Impact Assessment (HIA) to be undertaken to inform any subsequent development proposals. Waddeton Park has commissioned a HIA, and this emerging document has informed the Concept Plan.</p> <p>First, to inform the HIA, LiDAR analysis and a geophysical survey (Appendix 4) have been undertaken which confirms the extent of the remnant earthworks of the former water meadows within the allocation site. This confirmed that the remnant features are limited to the western third of the allocation site; bordering the A361 (see p.19, Appendix 4). These remaining earthworks are very highly eroded and in poor condition, with little remaining visible to the naked eye. Their significance as a heritage asset is identified as low both in their own right and in the contribution they make to the architectural and historical interest of Southwick Court.</p> <p>Notwithstanding this, the Concept Plan proposes no built development upon the former water meadows, with these areas identified within formal and informal open space, and as such, retained in situ. The access road will need to cross the feature, and a programme of archaeological mitigation will be appropriately implemented. Opportunities to provide enhancements, for example, through the provision of signage to better reveal the presence of the remnant features, could be included within development proposals.</p> <p>Secondly, a detailed assessment of the setting of Southwick Court farmhouse, gatehouse and bridge has been undertaken, and this has been a key influence on the design proposals for the site. This confirmed that the key setting of the listed buildings comprises their location within the historic moated enclosure, which is very insular in its setting with very limited views of the historic buildings from beyond. The main frontage of the house faces to the south-east, across its garden and away from the development. The key setting of the listed buildings will not be harmed by development as set out in the Concept Plan.</p> <p>In respect to the wider setting, the farmhouse was not designed within a parkland setting (its location is due to the former medieval moated manor), and its current agricultural setting is heavily influenced by the post- war development at Trowbridge and Southwick.</p> <p>The emerging proposals ensure appropriate consideration is given to the listed buildings and their setting. When considering the degree of harm which would arise as a result of the proposals shown on the Concept Plan, the following are material: A large majority of the land held within the landowner's control will remain in agricultural use;</p>				

The insular setting of the listed buildings, their enclosure and limited views between the proposed development site and the buildings;
The clear presence of post-war development in the wider setting;
The sensitive design of the access road, with siting, construction and lighting all designed to minimise the visual impact of the highway; and
The opportunities for targeted mitigation; including structural landscaping to the eastern side of the allocation site, and retention of the open setting to the Southwick Court outbuildings to the west.

The detailed design of mitigation can be considered as the proposals for the allocation site come forward, however, as demonstrated on the Concept Plan, there are a range of opportunities for suitable and appropriate mitigation to be identified.

In considering the above issues, the emerging HIA concludes that development in accordance with the Concept Plan, will result in no more than a very small degree of harm to the heritage significance of the Grade II* Listed Southwick Court farm house and the associated gatehouse and bridge. This level of harm would fall very much at the lower end of “less than substantial harm” as defined by paragraph 134 of the National Planning Policy Framework (NPPF).

In line with paragraph 134, this harm should be weighed against the public benefits of the proposal. As confirmed in Section 1 above, there is a clear and pressing need for additional housing within Trowbridge. In addition, there is an urgent need for additional primary school provision within this area of the town, and as highlighted by the site assessment summary (Step 4), as a result of the ability of the site to “deliver a solution to address deficiencies in local primary school provision and address constraints, then the overall sustainability benefits of development at this location would be significant”.

Introduction

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Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.

In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this representation, and provide further detail beyond the Council’s site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.

The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.

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Conclusions and recommendations

	<p>Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.</p> <p>The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.</p> <p>Sections 2 and 3 have considered the range of matters which have been considered as part of the site allocation process. The sustainable location of the site, and the accessibility of local services and facilities is clear; and the ability of the site to deliver housing to meet the significant residual shortfall within Trowbridge, a Principal Settlement, is acknowledged.</p> <p>Waddeton Park's emerging evidence base on the site's ecological, landscape and heritage baseline, and the ability to further refine development proposals for the site has enabled a more comprehensive assessment of the potential impacts and enhancement opportunities of development on the site.</p> <p>Heritage: a geophysical survey undertaken on the allocation site has enabled the extent of the remnant earthworks of the former water meadows to be identified, and subsequently, the Concept Plan confirms that these can be retained in situ. A detailed assessment of the setting of the listed buildings to the south of the site, has confirmed that by virtue of their enclosed nature, visual relationship to the allocation site, separation of the proposed built form from the assets and identified mitigation measures, that the heritage harm falls at the lower end of the "less than substantial" definition set out in the Framework.</p> <p>It is recognised that the Council are intending to submit the dHSAP to Examination in early 2018, and the intention to proceed with the Plan expediently is supported. Should the Council wish for a greater degree of certainty in respect to the development proposals discussed within this Representation, we would welcome the opportunity to discuss the drafting of a Statement of Common Ground for submission to the Examination process, identifying potential modifications to the draft allocation policy, for the Inspector to consider.</p> <p>These could include the allocation policy identifying the requirement to deliver a primary school on site and a new pedestrian access to Southwick Country Park. It would also provide an opportunity to provide a greater level of detail on the allocation plan; for example, identifying the location of woodland planting along the southern and western edges, the extent of the northern wildlife corridor, and the extent of the area on the western side (as demarcated by the former water meadows) which should be identified as informal or formal green space.</p>
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Comment ID:	3103	Consultee Waddeton Park Ltd Person ID: 1137560	Agent Miss Felicity Tozer Senior Planner Savills Person ID: 1137556	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Assessment: Site 3565 The draft allocation, H2.6 is supported by a site assessment (Table G.9, Trowbridge Community Area Topic Paper) and the Sustainability Appraisal (Table F.15, <i>ibid</i>).</p> <p>The site assessment represents the starting point for the allocation process, and as such, we comment on this below. These comments are informed by our emerging evidence base for the development site, and the draft Concept Plan (Appendix 2).</p> <p>Water The site assessment’s requirement to consider the implications of the Lambrok Stream and its floodplain within future development proposals is agreed.</p> <p>A detailed Flood Risk Assessment is being undertaken in relation to the development site, and this is informed by a Ground Investigation Report including infiltration testing. The built form is located outside of the floodplain, and a detailed attenuation strategy has been drafted in support of the emerging development proposals. The Concept Plan identifies the locations for attenuation within the allocation site, and these are included within the green infrastructure, providing a multi-functional role of site drainage alongside ecological enhancement.</p> <p>Introduction The adopted Core Strategy sets the overriding framework for the HSAP; identifying the requirement to deliver 42,000 homes over the plan period 2006-2026. These are disaggregated into three housing market areas (HMA), and subsequently to individual settlements or rural areas within the local area strategies. This representation relates to the ‘North West HMA’, and specifically the settlement of Trowbridge.</p> <p>Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.</p> <p>In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this representation, and provide further detail beyond the Council’s site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.</p> <p>The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.</p> <p>The production of an effective, deliverable and positively prepared HSAP will not only provide a solid foundation for tackling the housing crisis but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the HSAP submitted for examination is sound. Consistent with the National Planning Policy Framework (the “Framework”) (March 2012), to be sound, the HSAP must be:</p> <p>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;</p>				

	<p>Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <p>Effective– the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and</p> <p>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>It is recognised that as part two of Wiltshire’s Local Plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore only considered as appropriate within this representation.</p> <p>Conclusions and recommendations</p> <p>Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.</p> <p>The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.</p> <p>Sections 2 and 3 have considered the range of matters which have been considered as part of the site allocation process. The sustainable location of the site, and the accessibility of local services and facilities is clear; and the ability of the site to deliver housing to meet the significant residual shortfall within Trowbridge, a Principal Settlement, is acknowledged.</p> <p>Waddeton Park’s emerging evidence base on the site’s ecological, landscape and heritage baseline, and the ability to further refine development proposals for the site has enabled a more comprehensive assessment of the potential impacts and enhancement opportunities of development on the site.</p> <p>It is recognised that the Council are intending to submit the dHSAP to Examination in early 2018, and the intention to proceed with the Plan expediently is supported. Should the Council wish for a greater degree of certainty in respect to the development proposals discussed within this Representation, we would welcome the opportunity to discuss the drafting of a Statement of Common Ground for submission to the Examination process, identifying potential modifications to the draft allocation policy, for the Inspector to consider.</p> <p>These could include the allocation policy identifying the requirement to deliver a primary school on site and a new pedestrian access to Southwick Country Park. It would also provide an opportunity to provide a greater level of detail on the allocation plan; for example, identifying the location of woodland planting along the southern and western edges, the extent of the northern wildlife corridor, and the extent of the area on the western side (as demarcated by the former water meadows) which should be identified as informal or formal green space.</p>
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Comment ID:	3104	Consultee Waddeton Park Ltd Person ID: 1137560	Agent Miss Felicity Tozer Senior Planner Savills Person ID: 1137556	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
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				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Assessment: Site 3565 The draft allocation, H2.6 is supported by a site assessment (Table G.9, Trowbridge Community Area Topic Paper) and the Sustainability Appraisal (Table F.15, <i>ibid</i>).</p> <p>The site assessment represents the starting point for the allocation process, and as such, we comment on this below. These comments are informed by our emerging evidence base for the development site, and the draft Concept Plan (Appendix 2).</p> <p>Landscape The landscape commentary in the site assessment represents a summary of the ‘Site Landscape Assessment’ published as part of the Council’s evidence base. The commentary makes reference to the remnant earthworks associated with the water meadows. In this respect, we would reference the heritage commentary above, which has been informed by the emerging HIA and associated geophysical report.</p> <p>This confirms that the extent of these features, and as such presents a more detailed understanding of the allocation site for the purposes of the site allocation assessment.</p> <p>In addition to the HIA, a Landscape and Visual Impact Assessment (LVIA) is being prepared to support the emerging development proposals on the draft allocation site. The LVIA provides a robust and detailed assessment of the allocation site to a level of detail which will enable a decision to be taken on the planning application. As such, it provides a greater degree of clarity on the assessment of potential harm and the opportunities for mitigation.</p> <p>Appendix 3 includes a Note produced by Chris Britton Landscape Associates in response to the Council’s Site Landscape Assessment. First, it is noted with concern that the Council’s assessment has not taken into account its own most recent landscape analysis, West Wiltshire Landscape Character Assessment (March 2007), which provides a more recent and localised analysis than the County Landscape Character Assessment (2005). The 2007 Assessment provides a more site specific appraisal of the existing baseline contribution that the site makes to the local character, and in association with this, the influence that the existing built form of Trowbridge’s urban area has on the character of the site, and thus the impact of development. It is also noted that the viewpoint locations shown on the map included within the Site Landscape Assessment are incorrect, and an amended version is included for clarification.</p> <p>The emerging LVIA has identified a significant number of opportunities for landscape mitigation; including enhancement of existing landscape features, such as the northern landscape corridor, a substantial new landscape corridor along the southern and eastern edges of the proposed housing area, retention of the open character of the western side of the allocation site, and creation of a network of pedestrian links throughout the site contained within the green infrastructure. These are illustrated on the Concept Plan.</p> <p>The Council’s assessment has not taken into account the potential for mitigation measures to be incorporated into future proposals on the allocation site, and therefore overstates the potential landscape impacts of developing on the allocation site. In contrast to the Council’s assessment, the emerging LVIA (as confirmed on the attached noted) concludes that the emerging proposals would not give rise to any</p>				

unacceptable landscape or visual impacts and that, subject to the incorporation of the proposed mitigation measures, there is no landscape or visual justification as to why the proposed allocation of the site is unsound.

Introduction

The adopted Core Strategy sets the overriding framework for the HSAP; identifying the requirement to deliver 42,000 homes over the plan period 2006-2026. These are disaggregated into three housing market areas (HMA), and subsequently to individual settlements or rural areas within the local area strategies. This representation relates to the 'North West HMA', and specifically the settlement of Trowbridge.

Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.

In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this representation, and provide further detail beyond the Council's site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.

The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.

The production of an effective, deliverable and positively prepared HSAP will not only provide a solid foundation for tackling the housing crisis but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the HSAP submitted for examination is sound. Consistent with the National Planning Policy Framework (the "Framework") (March 2012), to be sound, the HSAP must be:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

It is recognised that as part two of Wiltshire's Local Plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore only considered as appropriate within this representation.

Conclusions and recommendations

Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.

The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.

Sections 2 and 3 have considered the range of matters which have been considered as part of the site allocation process. The sustainable location of the site, and the accessibility of local services and facilities is clear; and the ability of the site to deliver housing to meet the significant residual shortfall within Trowbridge, a Principal Settlement, is acknowledged.

Waddeton Park's emerging evidence base on the site's ecological, landscape and heritage baseline, and the ability to further refine development proposals for the site has enabled a more comprehensive assessment of the potential impacts and enhancement opportunities of development on the site.

Landscape: a more detailed, site specific landscape assessment has confirmed that, subject to the identified mitigation and enhancement opportunities being delivered, development on the allocation site would not give rise to unacceptable landscape or visual impacts.

It is recognised that the Council are intending to submit the dHSAP to Examination in early 2018, and the intention to proceed with the Plan expediently is supported. Should the Council wish for a greater degree of certainty in respect to the development proposals discussed within this

	<p>Representation, we would welcome the opportunity to discuss the drafting of a Statement of Common Ground for submission to the Examination process, identifying potential modifications to the draft allocation policy, for the Inspector to consider.</p> <p>These could include the allocation policy identifying the requirement to deliver a primary school on site and a new pedestrian access to Southwick Country Park. It would also provide an opportunity to provide a greater level of detail on the allocation plan; for example, identifying the location of woodland planting along the southern and western edges, the extent of the northern wildlife corridor, and the extent of the area on the western side (as demarcated by the former water meadows) which should be identified as informal or formal green space</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3105	Consultee Waddeton Park Ltd Person ID: 1137560	Agent Miss Felicity Tozer Senior Planner Savills Person ID: 1137556	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Assessment: Site 3565 The draft allocation, H2.6 is supported by a site assessment (Table G.9, Trowbridge Community Area Topic Paper) and the Sustainability Appraisal (Table F.15, <i>ibid</i>).</p> <p>The site assessment represents the starting point for the allocation process, and as such, we comment on this below. These comments are informed by our emerging evidence base for the development site, and the draft Concept Plan (Appendix 2).</p> <p>Education</p> <p>The Council's evidence base identifies an urgent need for additional primary school provision within south and south east Trowbridge. In response to this requirement, and following discussions with Wiltshire's Education Department, the emerging development proposals for the site include provision of a new primary school.</p> <p>The Concept Plan identifies the location of the school, and confirms that a 2hectare site is provided. This ensures that whilst initial proposals will relate to a one-form entry school, the site may be extended in the future to a two-form entry school should this need arise.</p> <p>It should be noted that the built form of the school illustrated on the Concept Plan relates to a two-form entry school, utilising national educational space guidance. This is to demonstrate that should the primary school extend to a two-form entry in the future, that all of the built form could still be provided outside of the area of the remnant water meadows.</p> <p>Introduction</p> <p>The adopted Core Strategy sets the overriding framework for the HSAP; identifying the requirement to deliver 42,000 homes over the plan period 2006-2026. These are disaggregated into three housing market areas (HMA), and subsequently to individual settlements or rural areas within the local area strategies. This representation relates to the 'North West HMA', and specifically the settlement of Trowbridge.</p> <p>Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.</p> <p>In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this representation, and provide further detail beyond the Council's site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.</p> <p>The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.</p> <p>The production of an effective, deliverable and positively prepared HSAP will not only provide a solid foundation for tackling the housing crisis but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the HSAP submitted for examination is sound. Consistent with the National Planning Policy Framework (the "Framework") (March 2012), to be sound, the HSAP must be:</p>				

	<p>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;</p> <p>Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <p>Effective– the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and</p> <p>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>It is recognised that as part two of Wiltshire’s Local Plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore only considered as appropriate within this representation.</p> <p>Conclusions and recommendations</p> <p>Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.</p> <p>The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.</p> <p>Sections 2 and 3 have considered the range of matters which have been considered as part of the site allocation process. The sustainable location of the site, and the accessibility of local services and facilities is clear; and the ability of the site to deliver housing to meet the significant residual shortfall within Trowbridge, a Principal Settlement, is acknowledged.</p> <p>Waddeton Park’s emerging evidence base on the site’s ecological, landscape and heritage baseline, and the ability to further refine development proposals for the site has enabled a more comprehensive assessment of the potential impacts and enhancement opportunities of development on the site.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3106	Consultee Waddeton Park Ltd Person ID: 1137560	Agent Miss Felicity Tozer Senior Planner Savills Person ID: 1137556	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Sustainability Appraisal: Site 3565</p> <p>The Site Assessment, discussed above, has been used to inform the Sustainability Appraisal's assessment of the site, and this was used to inform the 'ranking' of the sites as 'more sustainable' and 'less sustainable'.</p> <p>The Sustainability Appraisal, p12, indicates that those sites with five or more moderate adverse effects resulted in the site being considered 'less sustainable' as opposed to a site with four or less moderate adverse effects being identified as 'more sustainable'. It further notes that the distinction between moderate adverse and minor adverse relates to the ability to mitigate against any adverse impacts.</p> <p>Site 3565 scored five moderate adverse impacts, five minor adverse impacts, one minor positive, one moderate positive and one major positive. However, in light of the further evidence compiled by Waddeton Park and the confirmation of the detailed proposals in relation to the allocation site, as set out in Section 2 above, it is clear that the Sustainability Appraisal fails to appropriately consider the mitigation and benefits which can be secured within the allocation site, and the inclusion of a new primary school within the development proposals.</p> <p>It is noted that in order to assess the mitigation and enhancement opportunities which have been identified, that there is a need to provide a degree of certainty in respect to their provision. As such, the final paragraph in Section 4 of this Representation identifies where the draft allocation policy should be amended to provide further certainty in respect to the mitigation identified to address the potential impacts of development on the allocation site. In this respect, attention is drawn to other draft allocations within the dHSAP where a more detailed policy is provided.</p> <p>The table overleaf incorporates a number of amendments to the Sustainability Appraisal for the site, in line with the criteria set out in Table 2.3 of the Council's Sustainability Appraisal. These amendments confirm that against the Council's Sustainability Appraisal Criteria, the site should be identified as resulting in eight minor adverse impacts, one minor positive impact, two moderate positive impacts and two major positive impacts. As a result, the site would be classified as 'more sustainable' within the ranking of the potential development sites.</p> <p>(See attached Table 4)</p> <p>Introduction</p> <p>The adopted Core Strategy sets the overriding framework for the HSAP; identifying the requirement to deliver 42,000 homes over the plan period 2006-2026. These are disaggregated into three housing market areas (HMA), and subsequently to individual settlements or rural areas within the local area strategies. This representation relates to the 'North West HMA', and specifically the settlement of Trowbridge.</p> <p>Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.</p> <p>In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this representation, and provide further detail beyond the Council's site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.</p>				

	<p>The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.</p> <p>The production of an effective, deliverable and positively prepared HSAP will not only provide a solid foundation for tackling the housing crisis but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the HSAP submitted for examination is sound. Consistent with the National Planning Policy Framework (the “Framework”) (March 2012), to be sound, the HSAP must be:</p> <p>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;</p> <p>Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <p>Effective– the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and</p> <p>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>It is recognised that as part two of Wiltshire’s Local Plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore only considered as appropriate within this representation.</p> <p>Conclusions and recommendations</p> <p>Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.</p> <p>The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.</p> <p>Sections 2 and 3 have considered the range of matters which have been considered as part of the site allocation process. The sustainable location of the site, and the accessibility of local services and facilities is clear; and the ability of the site to deliver housing to meet the significant residual shortfall within Trowbridge, a Principal Settlement, is acknowledged.</p> <p>Waddeton Park’s emerging evidence base on the site’s ecological, landscape and heritage baseline, and the ability to further refine development proposals for the site has enabled a more comprehensive assessment of the potential impacts and enhancement opportunities of development on the site.</p> <p>The more informed site assessment results in the opportunity to clarify the Sustainability Appraisal underpinning the site allocation process. This confirms that in line with the Council’s methodology and criteria, that the site is incorrectly classified as ‘less sustainable’; and as such, should be amended to ‘more sustainable’.</p> <p>It is recognised that the Council are intending to submit the dHSAP to Examination in early 2018, and the intention to proceed with the Plan expediently is supported. Should the Council wish for a greater degree of certainty in respect to the development proposals discussed within this Representation, we would welcome the opportunity to discuss the drafting of a Statement of Common Ground for submission to the Examination process, identifying potential modifications to the draft allocation policy, for the Inspector to consider.</p> <p>These could include the allocation policy identifying the requirement to deliver a primary school on site and a new pedestrian access to Southwick Country Park. It would also provide an opportunity to provide a greater level of detail on the allocation plan; for example, identifying the location of woodland planting along the southern and western edges, the extent of the northern wildlife corridor, and the extent of the area on the western side (as demarcated by the former water meadows) which should be identified as informal or formal green space.</p>
Attached files (Please see Objective)	4743735 / 4743769 / 4743734 / 4743733 / 4743732
If your representation is seeking a change, do you consider it necessary to	

participate at the oral part of the examination?	
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Comment ID:	3107	Consultee Waddeton Park Ltd Person ID: 1137560	Agent Miss Felicity Tozer Senior Planner Savills Person ID: 1137556	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In respect to the draft policy and associated text, we object to the reference that ‘land to the west may become either formal or informal open space or remain in agricultural use, but will not be developed for new homes’ (#5.78). The site assessment (Table G.9) confirms that this requirement is based upon the remnant earthworks of the water meadows, however, as confirmed above, the area of these features relates to the western third of the allocation site (see Appendix 4), and as such, this element of the draft policy is incorrect. This must be clarified. It is noted that there is no intention to develop new homes on ‘land to the west’ and as confirmed below, the area falling outside of the former water meadows should be identified as land for the new primary school.</p> <p>Introduction</p> <p>The adopted Core Strategy sets the overriding framework for the HSAP; identifying the requirement to deliver 42,000 homes over the plan period 2006-2026. These are disaggregated into three housing market areas (HMA), and subsequently to individual settlements or rural areas within the local area strategies. This representation relates to the ‘North West HMA’, and specifically the settlement of Trowbridge.</p> <p>Waddeton Park are bringing forward proposals on Land South of Trowbridge; which is identified as a draft allocation under Policy H2.6 (Southwick Court). The area is shown on the plan attached at Appendix 1. The allocation of the site under Policy H2.6 is supported.</p> <p>In bringing forward proposals, a substantive evidence base is being compiled; including a full suite of ecology surveys, geotechnical surveys, geophysics, heritage impact assessment, landscape and visual assessment and transport assessment. These emerging documents inform this representation, and provide further detail beyond the Council’s site assessment, to confirm with greater certainty the impacts and benefits of development on the draft allocation site.</p> <p>The emerging development proposal for the draft allocation site includes around 180 dwellings, a new primary school, open space, sustainable drainage and strategic landscaping. The most up to date draft Concept Plan is enclosed at Appendix 2 for reference.</p> <p>The production of an effective, deliverable and positively prepared HSAP will not only provide a solid foundation for tackling the housing crisis but it will also ensure a planned and coordinated delivery of development alongside the necessary supporting infrastructure. This is only achievable if the HSAP submitted for examination is sound. Consistent with the National Planning Policy Framework (the “Framework”) (March 2012), to be sound, the HSAP must be:</p> <p>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;</p> <p>Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <p>Effective– the plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities; and</p> <p>Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p>				

	<p>It is recognised that as part two of Wiltshire’s Local Plan that elements of soundness were examined as part of the Core Strategy; for example the identification of the housing requirement, the spatial strategy, settlement hierarchy and disaggregation of the housing requirement to community areas and settlements. These are therefore only considered as appropriate within this representation.</p> <p>Conclusions and recommendations</p> <p>Waddeton Park support the allocation of site H2.6 within the dHSAP, and are committed to bringing forward a comprehensive, high quality development on the site to provide a short-medium term opportunity to meet the housing needs of Trowbridge, and Wiltshire; alongside meeting the urgent need for primary school provision within the town.</p> <p>The emerging Concept Plan is informed by a detailed evidence base, and as such, this Representation seeks to provide greater certainty in respect to the impacts and benefits of development on the allocation site, than is provided within the dHSAP evidence base.</p> <p>It is recognised that the Council are intending to submit the dHSAP to Examination in early 2018, and the intention to proceed with the Plan expediently is supported. Should the Council wish for a greater degree of certainty in respect to the development proposals discussed within this Representation, we would welcome the opportunity to discuss the drafting of a Statement of Common Ground for submission to the Examination process, identifying potential modifications to the draft allocation policy, for the Inspector to consider.</p> <p>These could include the allocation policy identifying the requirement to deliver a primary school on site and a new pedestrian access to Southwick Country Park. It would also provide an opportunity to provide a greater level of detail on the allocation plan; for example, identifying the location of woodland planting along the southern and western edges, the extent of the northern wildlife corridor, and the extent of the area on the western side (as demarcated by the former water meadows) which should be identified as informal or formal green space.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3108	Consultee Bovis Homes Limited	Agent Mr Desmond Dunlop Managing Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 841393	D2 Planning Limited Person ID: 558013	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3 North of Netherhampton Road		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Policy H3.3 North of Netherhampton Road, Salisbury</p> <p>Bovis Homes support the Council's decision to allocate land under their control to the north of Netherhampton Road, Salisbury for circa 100 dwellings. They consider that the site is ideally placed to meet part of the additional housing and/or employment requirement in the South Wiltshire Housing Market Area. Indeed Bovis Homes control additional land to the west of the proposed allocation which could provide additional residential or employment development. The extent of this land is shown on the attached plans. These plans demonstrate how by incorporating this land the proposals provide a better gateway to Salisbury in this location.</p> <p>A high-level study of the technical and environmental site constraints and opportunities detailed existing site knowledge and supplemented by visual walk-over survey to confirm key assumptions. Therefore, whilst proposals will be subject to further investigation and survey, the proposed scheme can be considered as both achievable and deliverable.</p> <p>Inclusion of additional land north of Netherhampton Road has the potential to create a number of benefits:-</p> <ol style="list-style-type: none"> 1. Opportunity to create a new consolidated Gateway to Salisbury on approach from the west - through a controlled enclosure of built form which logically extends the existing settlement as a series of streets and spaces, rather than simply driving past a new estate on the approach to the City. 2. To naturally reduce traffic speeds on Netherhampton Road - by taking in land on either side of Netherhampton Road the route can be designed as a series of new, human scale spaces which together create a pedestrian friendly streetscape to encourage walking and cycling, linking new and existing communities. 3. The ability to deliver a larger quantum of development - for employment or residential uses as necessary. 4. Create a series of publicly accessible open spaces from which previously glimpsed views (when considered primarily from the vantage point of the motorist) to the City and Cathedral can be more fully experienced. 5. Opportunity to logically site community and retail uses on the primary route into the City whilst still occupying a central location within a wider residential area – and in doing so, improve the commercial viability of any proposed retail outlets. 				

	<p>The site is available with only one landowner and can be delivered as it is under the control of an experienced national housebuilders. There are no constraints to the development of the site as follow:-</p> <p>The site comprises intensively farmed arable land that is in one ownership. The farmland is 'in hand' and is not subject to any agricultural tenancies. It is therefore available for development in the short term and is achievable with a realistic prospect for delivery as the land is controlled by an experienced developer in Bovis Homes.</p> <p>The site can be satisfactorily accessed through the introduction of a junction to the requisite standards in the A3094 Netherhampton Road this has been confirmed by Bovis Home's retained highway consultant.</p> <p>The site is well located to a range of services and facilities which would include strategic and local employment areas, as well as shops and other facilities.</p> <p>The site is not within any valued landscape as defined within paragraph 109 of the NPPF.</p> <p>The landscape has the capacity to accommodate development whilst retaining views of Salisbury Cathedral. The initial Landscape and Visual Impact Assessment has been undertaken and confirms the sites capacity to absorb the quantum of development proposed.</p> <p>The site is not the subject of any ecological designation or designated sites of importance for biodiversity (eg SPA, SSSI).</p> <p>The site is in arable use. It has been substantially managed and regularly ploughed. Hedgerows are sparse and there are virtually no trees (apart from isolated trees close to the Netherhampton Road) on the site. There is therefore little opportunity for protected species to establish themselves on the site. The proposals would provide an opportunity to provide biodiversity enhancement measures, including the introduction of a wider variety of habitats than currently present across the agricultural land.</p> <p>The entirety of the site is located within Flood Zone 1 and there are no flooding issues.</p> <p>Surface water would be capable of being discharged to the ground via infiltration techniques</p> <p>The nearby Petersfield Sewage Treatment Works has satisfactory hydraulic capacity to accommodate predicted foul water drainage from the proposed development.</p> <p>There are no statutorily designated heritage assets within the site or in proximity of the site.</p> <p>In view of the above, the site is available and deliverable and there are no constraints to the development moving forward.</p> <p>Recommendations Bovis consider that the additional land that they control to the west of the proposed allocation, as shown on the attached plans, should also be identified for residential/employment development.</p>
<p>Attached files (Please see Objective)</p>	<p>4743677</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>The issues raised need to be the subject of discussion and debate.</p>

Comment ID:	3109	Consultee Unknown The Crown Estate Person ID: 549444	Agent Mr David Fovargue Principal Consultant AMEC Person ID: 549441	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	No	
Please identify the policy, paragraph, table, figure or site to which you are referring.	4.1-4.72; approach to the HSAP		Justified		Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>A. Summary Wiltshire Council's (WC) Wiltshire Housing Site Allocations Plan (HSAP) pre-submission draft fails the tests of soundness set in National Planning Policy Framework (NPPF, Department for Communities and Local Government, March 2012) (NPPF) (NPPF182). Fundamentally, the HSAP is not 'positively prepared' because it fails to address the critical affordability issues facing Wiltshire's rural communities. This is demonstrated in the East HMA where the HSAP leaves the HMA's 18 'large villages' without any site allocations whatsoever. This hinders WC's ability to meet rural housing needs over nine year plan period. Site allocations are central to the delivery of affordable housing, with sites in Wiltshire required to deliver 30-40% provision.</p> <p>WC's approach to the HSAP also conflicts with the Wiltshire Core Strategy (VVCS). Paragraph 4.15 of the WCS states that settlement boundaries at large villages will be 'formally reviewed' via a site allocations plan orneighbourhood plans "to identify new developable land to help meet the housing and employment needs of that community". This dual mechanism for boundary reviews (via HSAP or neighbourhood plans) was a result of a main modification to the WCS required by the WCS plan Inspector to overcome the 'considerable risk' of a sole reliance on neighbourhood plans (IR36 (Paragraph 36, Wiltshire Core Strategy Inspector's Report {Inspector Andrew Seaman), December 2014)). The HSAP's approach to large villages in the East HMA is therefore entirely contrary to paragraph 4.15 and not what the WCS Inspector envisaged. The HSAP suggests that no site allocations are necessary at large villages in the East HMA because local needs have already been met, however this is not the case and cannot be justified. The community area housing requirements do not reflect local needs (i.e. the affordable housing needs of specific towns and villages) and are, in any case, 'minimum' housing requirements which do not reflect the Full Objectively Assessed Housing Needs (FOAHN) for Wiltshire. This flawed use of the community area requirements not only affects large villages in the East HMA but also the market town of Marlborough, where no new allocations are proposed despite the conclusions of the town's latest housing needs study (Marlborough Housing Needs and Requirements Study, Cobweb Consulting, 2017).</p> <p>B. Detailed Justification Context The government has recognised the significant issue of housing delivery with the NPPF setting out how plans should 'boost supply' (NPPF47) and the Housing White Paper setting out proposals to 'fix our broken housing market'. "This country doesn't have enough homes. That's not a personal opinion or a political calculation. It's a simple statement of fact." Secretary of State for Community and Local Government, Sajid Javid (Forward to the Housing White Paper, 2017). At the local level, Wiltshire Council's evidence highlights the specific issue of providing affordable housing to support rural communities: "The main policy issue is in rural areas is greater provision of affordable housing. It was noted above, under housing need, that there is a very low supply of rural affordable housing to meet the rural need." (Paragraph 10.12 of the 2011 SHMA).</p>				

Under the heading 'Key Sustainability Issues' the SA supporting the HSAP identifies that:

"There are a number of challenges faced by rural areas in Wiltshire. These include lack of affordable housing, an ageing population, rural isolation, and lesser accessibility as well as a decline in basic facilities... New development should be designed to enhance a sense of community through the provision of public/ community spaces and facilities, with the provision of appropriate levels of good quality affordable housing to meet local need."

(Sustainability Appraisal, page 11, emphasis added).

"Affordability: In Wiltshire there is a key issue of affordability, particularly in rural areas meaning that many people cannot afford to live where they grew up or where they work. This results in households settling for inadequate conditions, living in houses that are too small or in poor conditions. Rural areas also show the strongest polarity of incomes being home to both relatively low income households and high income ones typically involving long distance commuters. This is combined with a larger older population. Rural households register much greater difficulty in accessing services, a common pattern throughout the country."

(SA, page 80, emphasis added).

SA Objective 8 is therefore concerned with the need to "Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures."(SA, page 11).

At present, the HSAP does not address these needs, particularly in the East HMA where no allocations are proposed to the HMA's 18 large villages nor market town of Marlborough despite identified local housing needs. Combined with a poor track record of affordable housing delivery in the East HMA (affordable housing completions total just 23% of the total number of completions 2009-2017 against a policy requirement for 30-40% under CP43 - see Appendix B for details) rural affordability risks being further exacerbated.

The HSAP can clearly address this issue if a positive approach was taken to plan allocations - there would be no harm to the WCS spatial strategy by doing this.

WC's approach to the HSAP conflicts with the WCS (paragraph 4.15)

Paragraph 4.15 states the following.

"...Relaxation of the boundaries [at large villages] will only be supported where it has been formally reviewed through a subsequent DPD or a community-led neighbourhood plan, which includes a review of the settlement boundary to identify new developable land to help meet the housing and employment needs of that community..."

(Emphasis added).

The HSAP does not do this with large villages in the East HMA having been wholly excluded from consideration.

Not only is this contrary to paragraph 4.15 of the WCS but it also fails to plan positively for the critical affordability issues facing rural communities highlighted in both the SHMA and SA and poor track record of affordable housing delivery (Appendix B).

Any suggestion that neighbourhood plans can ensure that local needs are met, instead of via the HSAP, conflicts with both paragraph 4.15 and the 'considerable risk' of a sole reliance on neighbourhood plans identified by the WCS Inspector (Paragraph 36, Wiltshire Core Strategy Inspector's Report (Inspector Andrew Seaman), December 2014).

In IR36 the WCS Inspector also highlights how out-of-date boundaries in the East HMA are (formerly Kennet District):

"...it cannot be argued with great strength that the settlement boundaries contained therein are up to date for the purposes of the CS plan period. Indeed, the Council concedes in Topic Paper 3 'Settlement Strategy' that whilst existing boundaries offer protection to the countryside and guard against urban sprawl/ribbon development they are out of date, do not reflect current urban form and require review and updating ... a new boundary would be the ideal solution..."

It is apparent that the HSAP excludes large villages in the East HMA from consideration for two main reasons (as explained in 4.14-4.15 of the HSAP).

That 'local needs' have already been met via the achievement of community area requirements.

That going beyond these local needs will be in conflict with CP1.

The CP2 community area requirements are therefore taken as a ceiling to resist further allocations to large villages in the East HMA. However, this approach cannot be justified for the following reasons.

CP2 housing requirements (including community area requirements) have always been a 'minimum' requiring "at least 42,000 dwellings". For the words 'at least' to have any meaning, other housing therefore needs to come forward for development but this is entirely at odds with the approach taken to the draft HSAP.

CP2 housing requirements (including community area requirements) do not reflect the FOAHN required by NPPF47. The WCS Inspector identified a FOAHN of 44,000 dwellings (2,200dpa), with the government's more recent evidence suggesting 44,540 (2,227dpa) (Planning for the right homes in the right places: Consultation, DCLG, September 2017). It is therefore clear that the housing requirement in the WCS is not a ceiling and should not be treated as such for the purposes of preparing the HSAP.

CP2 community area requirements do not reflect local needs for affordable housing, contrary to the approach taken in the HSAP and supporting SA. Table 1, for example, identifies evidence of local housing needs at settlements where The Crown Estate has land interests and is keen to work with local communities to address their affordable housing needs, facilitated by market homes, and deliver local benefits.

Table 1 Evidence of local needs in the Eastern HMA (Marlborough, Bromham, Burbage and Great Bedwyn)

Settlement	Local housing needs
Marlborough	<p>The Marlborough Housing Needs and Requirements Study (2017) (Cobweb Consulting, May 2017) was prepared in support of the Town Council's emerging Marlborough Area Neighbourhood Plan (MANP).</p> <p>The Study identifies a need for affordable homes, inferring that 64 households need social or other affordable housing (para. 1.5.9):</p> <p>"..At least 107 households, 60% of whom [i.e. 64 households] are newly forming households seeking independence from the family or other existing household and hoping to move into their own accommodation in the next five years would require social or other forms of affordable housing."</p> <p>The Study notes that the AONB designation, presence of SSSI and proximity to the World Heritage Site act as a constraint to development and frustrate the ambitions of housing associations to development more shared ownership homes (para. 1.2.7).</p>
Bromham	<p>Bromham Parish Council has identified the need for 19 additional residential properties, including bungalows for elderly residents. This reflects their own housing needs evidence and is reported on page 12 of Report on the Informal Consultation on the approach to Large Villages (Wiltshire Council, January 2016) which forms part of the Council's HSA Plan evidence base.</p> <p>As part of this report the Parish Council expresses specific support for SHLAA Site 668 for 15 dwellings.</p> <p>With respect to neighbourhood planning the Parish Council notes that "This is still up for discussions. We have been advised that a NP would assist our input with regard to local development, however, we have no volunteers to undertake this work as yet. We have identified a suitable site as you will note in our response to the final section. This is in addition to infill properties."</p>

	<p>Burbage</p>	<p>Burbage Parish Council have submitted a draft NP to WC, with consultation on the draft NP open until 13th October 2017. Paragraph 9.18 of the draft NP notes the following:</p> <p>"The Wiltshire Council Housing Needs Survey Recommends 17 houses are urgently required to meet current need for either subsidised rented housing or shared/low cost home ownership".</p>	
	<p>Great Bedwyn</p>	<p>Great Bedwyn Parish Council undertook a questionnaire as part of preparing its Neighbourhood Plan and highlighted an "overwhelming support for affordable housing" (Record of meeting with Wiltshire Council, Place Studio and GBNDPWG, 13TH January 2017, at WCHQ in Trowbridge).</p> <p>In WC's Report on the Informal Consultation on the approach to Large Villages (Wiltshire Council, January 2016) Browns Lane (SHLAA site 552) is highlighted as a "potential site but questions remain about the sewage infrastructure and whether the additional number of houses in the area would be suitable".</p> <p>Further evidence is of course required to understand the scale of the housing need at Great Bedwyn which will need to be undertaken by either the parish council or WC.</p>	
<p>Attached files (Please see Objective)</p>	<p>4743666</p>		
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>These representations set out The Crown Estate's fundamental concerns regarding the approach the HSAP as a whole and its ability to address rural affordability in the East HMA.</p>		

Comment ID:	3110	Consultee Unknown The Crown Estate	Agent Mr David Fovargue Principal Consultant	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 549444	AMEC Person ID: 549441	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.1-4.72; approach to the HSAP		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Sustainability Appraisal (SA) underpinning the HSAP is also unjustified and contrary to section 12 of the SEA Regulations (The Environmental Assessment of Plans and Programmes Regulations 2004) and National Planning Practice Guidance (NPPG), which are both predicated on testing reasonable alternatives to ensure the 'most appropriate' strategy to addressing sustainability issues affecting the plan area. On this basis the SA needs to test the potentially negative social consequences of not addressing identified rural housing needs and reasonable alternatives whereby additional site allocations are proposed to meet identified needs in the East HMA.</p> <p>The SA is contrary to the SEA Regulations and NPPG 001</p> <p>The social consequences of not addressing the needs of large villages across the East HMA need to be considered as part of a robust SA process. In addition, an assessment of the effect of additional allocations to settlements with identified needs (i.e. large villages and Marlborough) should also be undertaken as part of an appraisal of 'reasonable alternatives' (as required by Regulation 12(2) of the SEA Regulations (The Environmental Assessment of Plans and Programmes Regulations 2004). Assessing reasonable alternatives through the SA is central to ensuring that the HSAP's proposals are the 'most appropriate' in response to the sustainability challenges facing the plan area (NPPG paragraph 001(NPPG, Paragraph 001 Reference ID: 11-001-20140306). Rural affordability is clearly one of the key sustainability challenges facing the area as identified in the SA and SHMA.</p> <p>The reasonable alternatives to be tested would go beyond the 'do-minimum' scenario currently pursued in the HSAP, a scenario which is predicated on achieving the community area requirements and no further. It would also need to test an alternative to the 'local service centre only' scenario in the East HMA, whereby only Market Lavington, Tidworth and Ludgershall are proposed for allocation. In testing this, regard should also be had to deliverability, and the potential over reliance on Tidworth and Ludgershall, particularly given that 44% of the East HMA's commitments are already proposed here.</p> <p>The reliance on windfalls should also be tested as part of an assessment of reasonable alternatives, for example, what level of affordable housing is likely to come forward alongside the 811 windfalls estimated in the East HMA? The lack of allocations and past reliance on windfalls could be one of the reasons why the track record of affordable housing completions in the East HMA has been so poor (see Appendix B). The allocation of sites - which are required to deliver 30-40% affordable housing provision in response to WCS CP43 - is surely a more appropriate strategy that should at least be considered.</p> <p>Providing a greater range and choice of sites and delivering further market and affordable homes is one of the ways to ensure a greater response to SA Objective 8 and the effectiveness of the HSAP in meeting the needs of rural communities. At the very least the allocation of additional sites should be tested to consider whether the HSAP is the most appropriate strategy for responding to one of the fundamental issues facing the plan area: rural affordability. Ensuring the most appropriate strategy is central to both the SEA Regulations and NPPG.</p> <p>Changes required to the HSAP</p> <p>The following changes are therefore required to the HSAP and its supporting evidence.</p> <p>Undertake a formal review of settlement boundaries to meet the future needs of large villages in accordance with WCS paragraph 4.15.</p>				

	<p>Test 'reasonable alternatives' as part of the SA to ensure compliance with Regulation 12(2) of the SEA Regulations and NPPG 001 to ensure that the HSAP is the 'most appropriate' strategy. For the East HMA reasonable alternatives include:</p> <p>Going beyond the 'minimum' community area requirements to address local housing needs through the allocation of additional sites at large villages (Bromham, Great Bedwyn and Burbage) and the market town of Marlborough;</p> <p>A reduced reliance on windfalls, with further allocations to boost affordable housing delivery on planned sites; and</p> <p>An alternative to the 'local service centre only' strategy currently being pursued whereby delivery in the East HMA is overly dependent on Tidworth and Ludgershall.</p> <p>Consider the allocation of The Crown Estate's sites (listed in Table 2 with site plans in Appendix A).</p>
<p>Attached files (Please see Objective)</p>	<p>4743666</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>These representations set out The Crown Estate's fundamental concerns regarding the approach the HSAP as a whole and its ability to address rural affordability in the East HMA.</p>

Comment ID:	3111	Consultee Unknown The Crown Estate	Agent Mr David Fovargue Principal Consultant	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 549444	AMEC Person ID: 549441	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.1-4.72; approach to the HSAP		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In considering and assessing additional site allocations as part of the SA it is important to highlight The Crown Estate's sites that have been submitted to all previous stages of the planmaking process, including sustainable and deliverable sites at Marlborough, Bromham, Great Bedwyn and Burbage (see Part B. Detailed Justification for further details, and Appendix A for site plans). There would be no harm to the WCS spatial strategy if these sites were allocated and, in responding to identified local needs, their allocation would help to plan positively to address the key issue of rural affordability facing the plan area.				
	Opportunities on The Crown Estate's sites Table 2 identifies sites on The Crown Estate's land which could contribute towards local needs for affordable housing as part of the HSAP and considered as part of a reasonable alternative to the current HSAP strategy for the East HMA. There would be no harm or conflict with the WCS spatial strategy if these sites were to be allocated as part of positive plan-making to address rural housing needs.				
	Table 2 Opportunities on The Crown Estate's Landholding (see Appendix A for site plans)				
	Site	Opportunity			
	Elcot Lane, Marlborough (SHLAA site 660) Appendix A Figure 1	At the time the WCS was being prepared two options were tested for a 'strategic site' allocation to Marlborough: the Salisbury Road site (which was ultimately allocated and is now being delivered) and Elect Lane (SHLAA site 660) (this is set out in WC's Strategic Sites Background Paper, 2009). The Crown Estate's site at Elcot Lane has therefore always been seen as the alternative to Salisbury Road and now that that site is coming forward, Elcot Lane can have a key role to play in meeting the town's future housing needs, particularly in light of the conclusions of the Marlborough housing needs study (see Table 1). The study highlights how the town's constraints (AONB,SSSI and WHS) are affecting the ability of RSLs to deliver affordable homes, but this scheme is an opportunity to overcome these issues and meet local needs (64 households) ,including the need for smaller homes.			

		<p>Appendix D includes an indicative masterplan for a discrete scheme on a well-contained site which sits well below the sensitive 160m AOD contours in the town, helping to minimise views from the wider AONB. As well as being sensitive to the AONB, this opportunity is not affected by the SSSI or the WHS.</p> <p>The setting of the listed buildings to the north can be respected, public rights of way retained and a new landscape boundary provided along the site's eastern boundary.</p> <p>The scheme can provide up to 50 units with access via Crest Nicholson scheme to south (agreement already in place with them).</p> <p>Technical work is already underway, including Phase 1 Ecology survey completed last year and no significant constraints are envisaged.</p>	
	<p>Breach Close, Bromham (SHLAA site 668) Appendix A Figure 4</p>	<p>Two masterplan options have been identified to deliver between 30 and 50 dwellings comprising SHLAA sites 668 and part of 671 (see Appendix C). With a WCS policy requirement to provide 30% affordable housing this opportunity can help the parish council respond to the need for 19 affordable homes in the village and their support for this SHLAA site. As well as helping to meet local housing needs, the proposals would improve connectivity (highways, PRoW and lighting) between Horsepool and the High Street.</p> <p>If a neighbourhood plan is not forthcoming (as the parish council have potentially flagged), the allocation of the site via the HSAP is a positive approach to addressing the needs of the village.</p>	
	<p>Saddlers Way, Burbage (SHLAA site 665) Appendix A Figure 2</p>	<p>This site adjoins the recent Persimmon scheme and is bounded by development on three sides, with the A338 on its southern boundary. The site has capacity for up to 50 units with access via Saddlers Way (previously agreed with WC's highways officer). There is an identified local need for 27 affordable homes and parish council support for this specific site, who are proposing to allocate it as part of their neighbourhood plan.</p> <p>Longer term options are also identified on Figure 2 (SHLAA sites 666 & 667) albeit the Saddlers Way site is prioritised at this stage in accordance with the parish council's approach.</p>	
	<p>Browns Lane, Great Bedwyn (SHLAA site 552) Appendix A Figure 3</p>	<p>This is a well screened and contained site in the village with potential for 15-20 units.</p> <p>The parish council have highlighted the potential of this site (against other options in the village), albeit flag concerns regarding the capacity of the foul drainage network. The Crown Estate can liaise with Thames Water to identify what works would need to take place as part of</p>	

	<div data-bbox="465 97 2002 204" style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> any future development to both meet local housing needs and deliver utility improvements if required. </div> <p>Changes required to the HSAP The following changes are therefore required to the HSAP and its supporting evidence. Undertake a formal review of settlement boundaries to meet the future needs of large villages in accordance with WCS paragraph 4.15. Test 'reasonable alternatives' as part of the SA to ensure compliance with Regulation 12(2) of the SEA Regulations and NPPG 001 to ensure that the HSAP is the 'most appropriate' strategy. For the East HMA reasonable alternatives include: Going beyond the 'minimum' community area requirements to address local housing needs through the allocation of additional sites at large villages (Bromham, Great Bedwyn and Burbage) and the market town of Marlborough; A reduced reliance on windfalls, with further allocations to boost affordable housing delivery on planned sites; and An alternative to the 'local service centre only' strategy currently being pursued whereby delivery in the East HMA is overly dependent on Tidworth and Ludgershall. Consider the allocation of The Crown Estate's sites (listed in Table 2 with site plans in Appendix A).</p>
Attached files (Please see Objective)	4743667 / 4743669 / 4743668
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	These representations set out The Crown Estate's fundamental concerns regarding the approach the HSAP as a whole and its ability to address rural affordability in the East HMA.

Comment ID:	3112	Consultee Mr George Smith Person ID: 835920	Agent Mrs Janet Montgomery Brimble, Lea and Partners Person ID: 438199	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation should be treated as an objection to Shrewton being discounted as a location for housing site allocations and, in particular SHLAA Site S146.</p> <p>It has been noted from the Amesbury Community Area Topic Paper June 2017 that SHLAA Sites in Shrewton were rejected at the Stage 3 of the site selection process with the stated reasons in table 6.5 as mainly being because of major adverse effects associated with River Avon SAC and water and sewer constraints (with some minor variations between sites).</p> <p>On this basis, the Habitat Regulations Assessment (HRA) June 2017 has been reviewed to provide an insight for these summary reasons for rejecting the sites at Stage 3. In the case of Shrewton, the settlement level screening assessment (Table 4) identifies the Likely Significant Effects (LSE) which are addressed below.</p> <p>Salisbury Plain Special Protection Area (SPA) – Criterion R1 Shrewton has been discounted at Stage 3 on the basis that the settlement is within 6.4km of the Salisbury Plain SPA, being the distance where the majority of visitors to the SPA originate. However, this reason cannot be substantiated on the basis that Warminster is also within 6.4km of the SPA where a significant amount of new development is being focused. This will have a much greater impact than the level of development that could be achieved in Shrewton, and analysis elsewhere in the HRA and the Sustainability Appraisal demonstrates that there is scope to mitigate the impact of any additional recreational pressure upon the SPA. There is no evidence to suggest that the Stone Curlew Mitigation Strategy identified in the Core Strategy, which was developed for the established housing requirements and is not changing as a result of this Site Allocation Plan, would be ineffective. As such, development in Shrewton as a matter of principle will not have a LSE on this SPA.</p> <p>River Avon Special Area for Conservation (SAC) – Criterion H2 The identified LSE of development in Shrewton on this SAC is flawed on the basis that Policy CP69 of the Core Strategy states that impacts are most likely to occur on developments within 20m of the river but the Stage 3 assessment then incorrectly assumes that development at settlements within 20m of the River Avon SAC could lead to LSE. This incorrect assumption is confirmed in the summary of screening assessment results where it states that the potential impacts of development in such settlements would be entirely site specific.</p> <p>Again, Warminster (and Salisbury) are settlements within 20m of this SAC but have not been discounted at Stage 3, and it is unreasonable to cherry pick the inclusion or exclusion of settlements for the purposes of the HRA.</p> <p>Water Abstraction – River Avon SAC – Criterion W1 The likely significant effect has identified a number of settlements but singles out any development in Shrewton as it is likely to contribute towards reduced flows which would consequently cause an unfavourable condition of the River Till.</p> <p>The HRA acknowledges that the impact on flows is based on Wessex Basin Ground Water Model (2016) which was based on an assumption of full uptake of private water supply licensed abstractions, but this does not reflect the recent actual abstraction rates in the area. Mitigation can be achieved to the local water supply network if necessary, as being applied to the allocation at Durrington. It is therefore inappropriate to discount Shrewton as a location for some development owing to potential mitigation if necessary to prevent any LSE.</p>				

	At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.

Comment ID:	3113	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Specific Assessment of S146 (Land to the West of Tanner's Lane and South of The Hollow)</p> <p>Before turning to the site-specific assessment of S146, it should be noted that The Parish of Shrewton has published a Draft Neighbourhood Plan on their website (dated August 2016). This includes the results of a housing need survey which revealed that 89.1% of those who responded to the survey support the provision of new housing, and states that a development of 53 dwellings would be expected to deliver the identified need for affordable housing. Even more housing may be required to deliver some of the Parish's other objectives in the Draft Plan (i.e. redevelopment of the village hall and enhanced recreational facilities). As such, Wiltshire Council's decision to discount any development in Shrewton through the Site Allocations Plan is unreasonable and unsustainable. The analysis further above demonstrates that development of this site in Shrewton will not have any LSE on the River Avon SAC and that water abstraction can be mitigated if necessary. A suitable drainage scheme would ensure that there would not be any pollution.</p> <p>At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.				

Comment ID:	3114	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation should be treated as an objection to Shrewton being discounted as a location for housing site allocations and, in particular SHLAA Site S150.</p> <p>It has been noted from the Amesbury Community Area Topic Paper June 2017 that SHLAA Sites in Shrewton were rejected at the Stage 3 of the site selection process with the stated reasons in table 6.5 as mainly being because of major adverse effects associated with River Avon SAC and water and sewer constraints (with some minor variations between sites).</p> <p>On this basis, the Habitat Regulations Assessment (HRA) June 2017 has been reviewed to provide an insight for these summary reasons for rejecting the sites at Stage 3. In the case of Shrewton, the settlement level screening assessment (Table 4) identifies the Likely Significant Effects (LSE) which are addressed below.</p> <p>Salisbury Plain Special Protection Area (SPA) – Criterion R1 Shrewton has been discounted at Stage 3 on the basis that the settlement is within 6.4km of the Salisbury Plain SPA, being the distance where the majority of visitors to the SPA originate. However, this reason cannot be substantiated on the basis that Warminster is also within 6.4km of the SPA where a significant amount of new development is being focused. This will have a much greater impact than the level of development that could be achieved in Shrewton, and analysis elsewhere in the HRA and the Sustainability Appraisal demonstrates that there is scope to mitigate the impact of any additional recreational pressure upon the SPA. There is no evidence to suggest that the Stone Curlew Mitigation Strategy identified in the Core Strategy, which was developed for the established housing requirements and is not changing as a result of this Site Allocation Plan, would be ineffective. As such, development in Shrewton as a matter of principle will not have a LSE on this SPA.</p> <p>River Avon Special Area for Conservation (SAC) – Criterion H2 The identified LSE of development in Shrewton on this SAC is flawed on the basis that Policy CP69 of the Core Strategy states that impacts are most likely to occur on developments within 20m of the river but the Stage 3 assessment then incorrectly assumes that development at settlements within 20m of the River Avon SAC could lead to LSE. This incorrect assumption is confirmed in the summary of screening assessment results where it states that the potential impacts of development in such settlements would be entirely site specific. Again, Warminster (and Salisbury) are settlements within 20m of this SAC but have not been discounted at Stage 3, and it is unreasonable to cherry pick the inclusion or exclusion of settlements for the purposes of the HRA.</p> <p>Water Abstraction – River Avon SAC – Criterion W1 The likely significant effect has identified a number of settlements but singles out any development in Shrewton as it is likely to contribute towards reduced flows which would consequently cause an unfavourable condition of the River Till.</p> <p>The HRA acknowledges that the impact on flows is based on Wessex Basin Ground Water Model (2016) which was based on an assumption of full uptake of private water supply licensed abstractions, but this does not reflect the recent actual abstraction rates in the area. Mitigation can be achieved to the local water supply network if necessary, as being applied to the allocation at Durrington. It is therefore inappropriate to discount Shrewton as a location for some development owing to potential mitigation if necessary to prevent any LSE.</p>				

	At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.

Comment ID:	3115	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Specific Assessment of S150 (Land North of the A360)</p> <p>Before turning to the site-specific assessment of S150, it should be noted that The Parish of Shrewton has published a Draft Neighbourhood Plan on their website (dated August 2016). This includes the results of a housing need survey which revealed that 89.1% of those who responded to the survey support the provision of new housing, and states that a development of 53 dwellings would be expected to deliver the identified need for affordable housing. Even more housing may be required to deliver some of the Parish's other objectives in the Draft Plan (i.e. redevelopment of the village hall and enhanced recreational facilities). As such, Wiltshire Council's decision to discount any development in Shrewton through the Site Allocations Plan is unreasonable and unsustainable. The analysis further above demonstrates that development of this site in Shrewton will not have any LSE on the River Avon SAC and that water abstraction can be mitigated if necessary. A suitable drainage scheme would ensure that there would not be any pollution.</p> <p>Any development proposal would be required by national and local planning policies to demonstrate with evidence that there is sufficient infrastructure in place (e.g. highways, education, health, sewerage, water supply etc) and, if necessary, capacity can be secured through the planning process. This would be covered by specific criteria in a site allocation policy.</p> <p>The identified minor and moderate adverse effects can be fully mitigated through detailed assessment and, where appropriate, the imposition of conditions and provision of planning obligations through the development management decision-making process.</p> <p>At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.				

Comment ID:	3116	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation should be treated as an objection to Shrewton being discounted as a location for housing site allocations and, in particular SHLAA Site S151.</p> <p>It has been noted from the Amesbury Community Area Topic Paper June 2017 that SHLAA Sites in Shrewton were rejected at the Stage 3 of the site selection process with the stated reasons in table 6.5 as mainly being because of major adverse effects associated with River Avon SAC and water and sewer constraints (with some minor variations between sites).</p> <p>On this basis, the Habitat Regulations Assessment (HRA) June 2017 has been reviewed to provide an insight for these summary reasons for rejecting the sites at Stage 3. In the case of Shrewton, the settlement level screening assessment (Table 4) identifies the Likely Significant Effects (LSE) which are addressed below.</p> <p>Salisbury Plain Special Protection Area (SPA) – Criterion R1 Shrewton has been discounted at Stage 3 on the basis that the settlement is within 6.4km of the Salisbury Plain SPA, being the distance where the majority of visitors to the SPA originate. However, this reason cannot be substantiated on the basis that Warminster is also within 6.4km of the SPA where a significant amount of new development is being focused. This will have a much greater impact than the level of development that could be achieved in Shrewton, and analysis elsewhere in the HRA and the Sustainability Appraisal demonstrates that there is scope to mitigate the impact of any additional recreational pressure upon the SPA. There is no evidence to suggest that the Stone Curlew Mitigation Strategy identified in the Core Strategy, which was developed for the established housing requirements and is not changing as a result of this Site Allocation Plan, would be ineffective. As such, development in Shrewton as a matter of principle will not have a LSE on this SPA.</p> <p>River Avon Special Area for Conservation (SAC) – Criterion H2 The identified LSE of development in Shrewton on this SAC is flawed on the basis that Policy CP69 of the Core Strategy states that impacts are most likely to occur on developments within 20m of the river but the Stage 3 assessment then incorrectly assumes that development at settlements within 20m of the River Avon SAC could lead to LSE. This incorrect assumption is confirmed in the summary of screening assessment results where it states that the potential impacts of development in such settlements would be entirely site specific. Again, Warminster (and Salisbury) are settlements within 20m of this SAC but have not been discounted at Stage 3, and it is unreasonable to cherry pick the inclusion or exclusion of settlements for the purposes of the HRA.</p> <p>Water Abstraction – River Avon SAC – Criterion W1 The likely significant effect has identified a number of settlements but singles out any development in Shrewton as it is likely to contribute towards reduced flows which would consequently cause an unfavourable condition of the River Till.</p> <p>The HRA acknowledges that the impact on flows is based on Wessex Basin Ground Water Model (2016) which was based on an assumption of full uptake of private water supply licensed abstractions, but this does not reflect the recent actual abstraction rates in the area. Mitigation can be achieved to the local water supply network if necessary, as being applied to the allocation at Durrington. It is therefore inappropriate to discount Shrewton as a location for some development owing to potential mitigation if necessary to prevent any LSE.</p>				

	At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.

Comment ID:	3117	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Specific Assessment of S151 (Land South of Nettley Farm)</p> <p>Before turning to the site-specific assessment of S151, it should be noted that The Parish of Shrewton has published a Draft Neighbourhood Plan on their website (dated August 2016). This includes the results of a housing need survey which revealed that 89.1% of those who responded to the survey support the provision of new housing, and states that a development of 53 dwellings would be expected to deliver the identified need for affordable housing. Even more housing may be required to deliver some of the Parish's other objectives in the Draft Plan (i.e. redevelopment of the village hall and enhanced recreational facilities). As such, Wiltshire Council's decision to discount any development in Shrewton through the Site Allocations Plan is unreasonable and unsustainable. The analysis further above demonstrates that development of this site in Shrewton will not have any LSE on the River Avon SAC and that water abstraction can be mitigated if necessary. A suitable drainage scheme would ensure that there would not be any pollution.</p> <p>Any development proposal would be required by national and local planning policies to demonstrate with evidence that there is sufficient infrastructure in place (e.g. highways, education, health, sewerage, water supply etc) and, if necessary, capacity can be secured through the planning process. This would be covered by specific criteria in a site allocation policy.</p> <p>The identified minor and moderate adverse effects can be fully mitigated through detailed assessment and, where appropriate, the imposition of conditions and provision of planning obligations through the development management decision-making process.</p> <p>At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.				

Comment ID:	3118	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation should be treated as an objection to Shrewton being discounted as a location for housing site allocations and, in particular SHLAA Site S152.</p> <p>It has been noted from the Amesbury Community Area Topic Paper June 2017 that SHLAA Sites in Shrewton were rejected at the Stage 3 of the site selection process with the stated reasons in table 6.5 as mainly being because of major adverse effects associated with River Avon SAC and water and sewer constraints (with some minor variations between sites).</p> <p>On this basis, the Habitat Regulations Assessment (HRA) June 2017 has been reviewed to provide an insight for these summary reasons for rejecting the sites at Stage 3. In the case of Shrewton, the settlement level screening assessment (Table 4) identifies the Likely Significant Effects (LSE) which are addressed below.</p> <p>Salisbury Plain Special Protection Area (SPA) – Criterion R1 Shrewton has been discounted at Stage 3 on the basis that the settlement is within 6.4km of the Salisbury Plain SPA, being the distance where the majority of visitors to the SPA originate. However, this reason cannot be substantiated on the basis that Warminster is also within 6.4km of the SPA where a significant amount of new development is being focused. This will have a much greater impact than the level of development that could be achieved in Shrewton, and analysis elsewhere in the HRA and the Sustainability Appraisal demonstrates that there is scope to mitigate the impact of any additional recreational pressure upon the SPA. There is no evidence to suggest that the Stone Curlew Mitigation Strategy identified in the Core Strategy, which was developed for the established housing requirements and is not changing as a result of this Site Allocation Plan, would be ineffective. As such, development in Shrewton as a matter of principle will not have a LSE on this SPA.</p> <p>River Avon Special Area for Conservation (SAC) – Criterion H2 The identified LSE of development in Shrewton on this SAC is flawed on the basis that Policy CP69 of the Core Strategy states that impacts are most likely to occur on developments within 20m of the river but the Stage 3 assessment then incorrectly assumes that development at settlements within 20m of the River Avon SAC could lead to LSE. This incorrect assumption is confirmed in the summary of screening assessment results where it states that the potential impacts of development in such settlements would be entirely site specific. Again, Warminster (and Salisbury) are settlements within 20m of this SAC but have not been discounted at Stage 3, and it is unreasonable to cherry pick the inclusion or exclusion of settlements for the purposes of the HRA.</p> <p>Water Abstraction – River Avon SAC – Criterion W1 The likely significant effect has identified a number of settlements but singles out any development in Shrewton as it is likely to contribute towards reduced flows which would consequently cause an unfavourable condition of the River Till.</p> <p>The HRA acknowledges that the impact on flows is based on Wessex Basin Ground Water Model (2016) which was based on an assumption of full uptake of private water supply licensed abstractions, but this does not reflect the recent actual abstraction rates in the area. Mitigation can be achieved to the local water supply network if necessary, as being applied to the allocation at Durrington. It is therefore inappropriate to discount Shrewton as a location for some development owing to potential mitigation if necessary to prevent any LSE.</p>				

	At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.

Comment ID:	3119	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Specific Assessment of S152 (Land at Rollestone Manor Farm)</p> <p>Before turning to the site-specific assessment of S152, it should be noted that The Parish of Shrewton has published a Draft Neighbourhood Plan on their website (dated August 2016). This includes the results of a housing need survey which revealed that 89.1% of those who responded to the survey support the provision of new housing, and states that a development of 53 dwellings would be expected to deliver the identified need for affordable housing. Even more housing may be required to deliver some of the Parish's other objectives in the Draft Plan (i.e. redevelopment of the village hall and enhanced recreational facilities). As such, Wiltshire Council's decision to discount any development in Shrewton through the Site Allocations Plan is unreasonable and unsustainable. The analysis further above demonstrates that development of this site in Shrewton will not have any LSE on the River Avon SAC and that water abstraction can be mitigated if necessary. A suitable drainage scheme would ensure that there would not be any pollution.</p> <p>It is not possible for a high level plan-making assessment to conclude that any development of this Site would, as a matter of principle, harm the character, setting and significance of Rollestone Manor. A Heritage Assessment with an application for planning permission to develop the site would demonstrate that a development proposal takes into account, and preserves, this listed building in accordance with legislative and policy requirements.</p> <p>Any development proposal would be required by national and local planning policies to demonstrate with evidence that there is sufficient infrastructure in place (e.g. highways, education, health, sewerage, water supply etc) and, if necessary, capacity can be secured through the planning process. This would be covered by specific criteria in a site allocation policy.</p> <p>The identified minor and moderate adverse effects can be fully mitigated through detailed assessment and, where appropriate, the imposition of conditions and provision of planning obligations through the development management decision-making process.</p> <p>At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.				

Comment ID:	3120	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation should be treated as an objection to Shrewton being discounted as a location for housing site allocations and, in particular SHLAA Site S154.</p> <p>It has been noted from the Amesbury Community Area Topic Paper June 2017 that SHLAA Sites in Shrewton were rejected at the Stage 3 of the site selection process with the stated reasons in table 6.5 as mainly being because of major adverse effects associated with River Avon SAC and water and sewer constraints (with some minor variations between sites).</p> <p>On this basis, the Habitat Regulations Assessment (HRA) June 2017 has been reviewed to provide an insight for these summary reasons for rejecting the sites at Stage 3. In the case of Shrewton, the settlement level screening assessment (Table 4) identifies the Likely Significant Effects (LSE) which are addressed below.</p> <p>Salisbury Plain Special Protection Area (SPA) – Criterion R1 Shrewton has been discounted at Stage 3 on the basis that the settlement is within 6.4km of the Salisbury Plain SPA, being the distance where the majority of visitors to the SPA originate. However, this reason cannot be substantiated on the basis that Warminster is also within 6.4km of the SPA where a significant amount of new development is being focused. This will have a much greater impact than the level of development that could be achieved in Shrewton, and analysis elsewhere in the HRA and the Sustainability Appraisal demonstrates that there is scope to mitigate the impact of any additional recreational pressure upon the SPA. There is no evidence to suggest that the Stone Curlew Mitigation Strategy identified in the Core Strategy, which was developed for the established housing requirements and is not changing as a result of this Site Allocation Plan, would be ineffective. As such, development in Shrewton as a matter of principle will not have a LSE on this SPA.</p> <p>River Avon Special Area for Conservation (SAC) – Criterion H2 The identified LSE of development in Shrewton on this SAC is flawed on the basis that Policy CP69 of the Core Strategy states that impacts are most likely to occur on developments within 20m of the river but the Stage 3 assessment then incorrectly assumes that development at settlements within 20m of the River Avon SAC could lead to LSE. This incorrect assumption is confirmed in the summary of screening assessment results where it states that the potential impacts of development in such settlements would be entirely site specific. Again, Warminster (and Salisbury) are settlements within 20m of this SAC but have not been discounted at Stage 3, and it is unreasonable to cherry pick the inclusion or exclusion of settlements for the purposes of the HRA.</p> <p>Water Abstraction – River Avon SAC – Criterion W1 The likely significant effect has identified a number of settlements but singles out any development in Shrewton as it is likely to contribute towards reduced flows which would consequently cause an unfavourable condition of the River Till.</p> <p>The HRA acknowledges that the impact on flows is based on Wessex Basin Ground Water Model (2016) which was based on an assumption of full uptake of private water supply licensed abstractions, but this does not reflect the recent actual abstraction rates in the area. Mitigation can be achieved to the local water supply network if necessary, as being applied to the allocation at Durrington. It is therefore inappropriate to discount Shrewton as a location for some development owing to potential mitigation if necessary to prevent any LSE.</p>				

	At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.

Comment ID:	3121	Consultee Mr George Smith	Agent Mrs Janet Montgomery Brimble, Lea and Partners	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 835920	Person ID: 438199	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Site Specific Assessment of S154 (Land to the South of London Road)</p> <p>Before turning to the site-specific assessment of S154, it should be noted that The Parish of Shrewton has published a Draft Neighbourhood Plan on their website (dated August 2016). This includes the results of a housing need survey which revealed that 89.1% of those who responded to the survey support the provision of new housing, and states that a development of 53 dwellings would be expected to deliver the identified need for affordable housing. Even more housing may be required to deliver some of the Parish's other objectives in the Draft Plan (i.e. redevelopment of the village hall and enhanced recreational facilities). An earlier draft version of the Shrewton Neighbourhood Plan identified the northern part of Site 154, adjacent London Road, as their preferred site for residential development. As such, Wiltshire Council's decision to discount any development in Shrewton through the Site Allocations Plan is unreasonable and unsustainable. The analysis further above demonstrates that development of this site in Shrewton will not have any LSE on the River Avon SAC and that water abstraction can be mitigated if necessary. A suitable drainage scheme would ensure that there would not be any pollution.</p> <p>Any development proposal would be required by national and local planning policies to demonstrate with evidence that there is sufficient infrastructure in place (e.g. highways, education, health, sewerage, water supply etc) and, if necessary, capacity can be secured. This would be covered by specific criteria in a site allocation policy.</p> <p>The identified minor and moderate adverse effects can be fully mitigated through detailed assessment and, where appropriate, the imposition of conditions and provision of planning obligations through the development management decision-making process.</p> <p>At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE and alleged major adverse impacts.				

Comment ID:	3122	Consultee Lincoln College Oxford	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 393560	Person ID: 1131505	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Amesbury, Bulford and Durrington		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>[Representation which sets out argument for allocation of Land at London Road, Amesbury (SHLAA site 3379) - refer to attached submission statement. and summarised below]</p> <p>This document is prepared on behalf of Lincoln College (Oxford), the freehold owner of land at Amesbury. It is prepared in response to Wiltshire Council's (WC's) consultation on a draft of the Wiltshire Housing Site Allocations Plan, summer 2017. It proposes that the Allocations Plan formally allocates land between London Road and the A303 at Amesbury (the 'College land'), for either;</p> <p>Mixed-use development comprising circa up to 73 dwellings and 24,000m2 B1 employment, or;</p> <p>Residential-only development for up to 100 dwellings. These proposals are justified for the following inter-related reasons:</p> <p>The location is acknowledged by WC as sustainable, due to its relationship with the existing built-up area, and its proximity to a wide range of services and facilities;</p> <p>The site is capable of delivering the full housing requirement for the Amesbury Community Area. In contrast, WC's proposed allocations will underprovide, and on more sensitive land.</p> <p>The site can also deliver a significant element of B1 employment, complementing Amesbury's role as a key economic hub in the County, which is set to expand with the expansion of Boeing at Boscombe Down;</p> <p>Contrary to the incomplete analysis undertaken by WC, environmental, technical and land constraints on the site are all capable of being overcome.</p> <p>Under the DCLG's new approach to calculating housing need, Wiltshire needs to increase supply by circa 6% annually. It should also, under the NPPF, plan for up to 15 years ahead whereas the draft Allocations plan extends only to 2026. Positive consideration must therefore be given to sustainable sites such as this.</p> <p>1. Site context and planning background</p> <p>1. Site characteristics</p> <p>1.1. The College site at London Road measures approximately 4.5 hectares and comprises an undeveloped agricultural field, pictured below: [see attachment]</p> <p>1.2 There are currently no structures, buildings or other developed features on the site. However, the following points are of note:</p> <p>there is a vehicular access to London Road at the eastern end of the site;</p> <p>the site contains changes in level, from 90m in height on its southern corner to c.75m beside the A303. However, much of this change in level occurs by means of embankments close to the southern boundary, with most of the remainder of the site being of a developable gradient. A topographical survey has been undertaken on behalf of the College and this is included as Appendix 1.</p> <p>boundaries of the site primarily comprise mature trees and hedgerows, with further wooden and/or mesh stock-proof fencing.</p> <p>Site context</p>				

1.3 The site comprises an undeveloped agricultural field, and in policy terms is positioned outside of any Settlement Boundary or site-specific allocation. It is, however, positioned within an active, urbanised environment being entirely surrounded by large buildings, roads and structures which exert such a significant urbanising influence, that the site is not perceived as 'countryside' in any meaningful sense. Key features immediately adjoining the site include the A303, retail and industrial development, and residential uses, as identified in the figure below. [see attachment]

1.4. Nonetheless the character of the area is by no means unpleasant or overly industrial. This is due to a number of factors including the presence of substantial mature trees and hedgerows, the reasonably unobtrusive architectural treatment of larger buildings, and the existence of distant views between the site and London Road towards surrounding hills and countryside, made possible by local topography.

Previous planning applications

1.5. In the late 1960s, the College entered into an agreement allowing the large scale quarrying of chalk from this area, which it is understood is likely to have been in connection with the construction of the A303. However, the extent to which this in fact proceeded is not certain.

1.6. The only planning application identifiable from Wiltshire Council's records available online is a scheme submitted in 1994 (reference S/94/0630) for a 30,000 sq. ft foodstore, with circa 300 parking spaces, accessed from a new roundabout to the east of the site, as shown below. [see attachment]

1.7. There are a number of notable points from this application. Firstly, it was refused on a single refusal reason, which related solely to the impact of the proposed foodstore on the viability of Amesbury Town Centre, in combination with a separate application at Butterfield Down. In turn the proposals were taken to appeal, but dismissed, for the same reason. The decision notice is included as an Appendix.

1.8. Conversely, officer's report to committee indicated that there was no objection in terms of landscape, archaeology, ecology or any other technical or environmental issue subject to the appropriate controls by means of condition. Notable excerpts from the officer's report are shown below: [see attachment]

1.9. Equally there was no objection from the Highways England in relation to the A303, subject to no direct access from the A303 and light sources being screened.

1.10 Overall despite the passage of time, the previous application indicates that the site is physically and environmentally capable of accommodating major development.

2. Previous consideration by WC for residential development

2.1. The Council has reviewed the land at London Road several times, as part of the production of the Wiltshire Core Strategy, South Wiltshire Core Strategy, and now the Site Allocations DPD. On each occasion the College's land has been assessed highly in terms of sustainability and accessibility.

Topic Paper 19 to the South Wiltshire Core Strategy (2008)

2.2. This considered a number of options for housing around Amesbury, on a 360-degree search basis around the town's edge. From this assessment, shown in part below, it was shown that the site has 'potential scope for strategic growth', sequentially preferable to alternatives north, east and west of the town.

2.3 Topic Paper 19 was accompanied by site-specific assessment tables reviewing key environmental, landscape, transport and other sustainability factors affecting each of the possible development sites around Amesbury. The table below provides an excerpt from this process [see attachment]

2.4 Emerging from this assessment, therefore, was the view that the College's land is a clear suitable opportunity for housing

Sustainability Appraisal Report by Enfusion and Nicholas Pearson Associates on behalf of WC (2009)

2.5 This review considered a range of possible sites in terms of 23 separate Sustainability Appraisal Objectives, providing a score against each of these. As the table below shows, the assessment identified that development of the Lincoln College site would be broadly positive in sustainability terms, with 17 of the 23 criteria receiving a positive or neutral rating.

2.6. The following findings from the 2009 Sustainability Appraisal Report are of particular note:

- Objective 1: Social inclusion for all

"The site is on the northern edge of Amesbury and contained by the A303. Good access to existing facilities."

- Objective 9: Improve air quality and reduce greenhouse gas emissions

“Although all development inevitably increases car use; the site is within reasonable walking distance of facilities.”

· Objective 10: Promote sustainable transport by improving affordable and accessible solutions particularly in rural areas
“A development of this scale is unlikely to bring forward any public transport improvements. However good bus service exists.”

· Objective 15: Conserve and enhance biodiversity and geodiversity

“The site is contained by development to the south and the A303 to the north. No significant impact”

· Objective 16: Conserve and enhance the District’s landscapes

“The site is contained by development to the south and the A303 to the north. No significant impact as any biodiversity value unlikely.

2.7. The assessment concluded overall in relation to the College land site that :

“This small site performs well against the Sustainability Framework criteria being a well contained site with good access to facilities. There may be potential for employment development given the strategic location but this will be dependent on the use class proposed. As with most sites in, or adjacent to, Amesbury an archaeological evaluation will be required. Although not of a scale to take a strategic level of development could count towards the overall housing requirement.”

Wiltshire Housing Site Allocations Plan - Sustainability Appraisal, 2017 (Atkins)

2.8. Accompanying the current consultation on the Site Allocations DPD is this detailed appraisal of each of the candidate sites for allocation against the following criteria:

1: Protect and enhance all biodiversity and geological features and avoid irreversible losses

2: Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings

3: Use and manage water resources in a sustainable manner

4: Improve air quality throughout Wiltshire and minimise all sources of environmental pollution

5a: Minimise our impacts on climate change – through reducing greenhouse gas emissions

5b: Minimise our impacts on climate change – through reducing our vulnerability to future climate change effects

6: Protect, maintain and enhance the historic environment

7: Conserve and enhance the character and quality of Wiltshire’s rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place

8: Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures

9: Reduce poverty and deprivation and promote more inclusive and self-contained communities

10: Reduce the need to travel and promote more sustainable transport choices

11: Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth

12: Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local business and a changing workforce

2.9. For the College land (referred to as site 3379), paragraph 7.3.22 notes that “no major adverse effects have been identified for this site.”

Five ‘moderate adverse’ effects are noted, on which we comment in turn:

Potential for impacts on the Salisbury Plain SPA and River Avon SAC (SA objective 1) This is acknowledged as a consideration, albeit in this respect the College site is no different to either of the other two sites proposed by WC for allocation.

Potential for impacts on River Avon SAC due to abstraction (SA objective 3). Again, the College site is in the same position as the two proposed allocation sites.

Impacts relating to A303 (SA objective 4). Paragraph 7.3.23 states that:

“there are likely to be adverse effects arising from development due to the likely increase in vehicular trips. Such issues could relate inter alia to noise, dust and lighting. Furthermore, topographical issues may make mitigation of noise impacts from the adjacent A303, through provision of a landscape buffer, problematic to achieve”

Attached to this representation are two deliverable masterplans for the site, underpinned by a noise assessment which demonstrates that an appropriate layout can be achieved with suitable noise mitigation, meaning that the above concerns are misplaced.

Flood risk assessment (SA objective 5b). The assessment has commented that:

“There is potential to increase flood risk off site through increased surface water runoff development. Ground conditions may influence the choice of surface water management techniques to address increased flood risk from development of the site and this may result in a reduced area for housing. A flood risk assessment would be required”

Again, this is not a site-specific concern; rather drainage is a matter relevant to all development proposals, and the masterplans for the College land, submitted with this statement include appropriate Sustainable Urban Drainage measures.

Archaeology (SA objective 6). The assessment has commented that :

“There are known archaeological assets on and adjacent to the site, including barrows and burials. The site also has high archaeological potential. An archaeological assessment would be required however mitigation could be problematic to achieve”

The Amesbury area is indeed known for its high archaeological potential, but again this is in common with the wider area including Durrington where the allocations are proposed. More importantly though, much of the site was quarried in the 1960s in association with the A303, which is likely to have disturbed any buried archaeology. This is not the case in the other proposed allocated sites.

2.10. A summary of how the College land has been assessed in comparison to the two allocated sites, is included overleaf. From this it is apparent that across the majority of criteria, the College site is assessed to have the same overall effect as either of the 2 sites in Durrington proposed for allocation. In only one case is the College site assessed to have a more negative effect than both of the other sites (criterion 4, relating to air quality).

2.11. Conversely, in two cases the College site is assessed to have a more positive effect. These are criterion 8, relating to the provision of housing, and criterion 10, relating to reducing the need to travel and promoting more sustainable transport choices.

2.12 Overall, and for reasons explored in more detail in the following sections, it does not logically follow from the SA assessment that the College land at Amesbury should be excluded from the Allocations plan. [see figure in attachment]

Site Landscape Assessment (The Environment Partnership / WC, June 2017)

2.13. Alongside the current draft Allocations Plan, the Council has published a detailed landscape appraisal of the sites considered, from which it is found that the College land:

is ‘pleasant’ but not ‘attractive’ in landscape character terms;

does not contribute to the settlement setting of Amesbury;

has ‘low sensitivity’ in terms of public access;

has ‘no important views’;

has ‘high mitigation potential’;

has a ‘moderate-high capacity to accommodate change’

2.14. In the assessment, it is apparent that the College land has landscape advantages over the two selected sites in Durrington, stemming from its already urban (as opposed to rural) location. The assessment comments:

“The site is well contained along its northern boundary by tree planting and by the mature hedgerow along the south western boundary. Effects on receptors to the south could be partly mitigated by appropriate landscape treatment along London Road. Some views from the south across the site towards Salisbury Plain East should be maintained through the arrangement of development. The hedgerow along the south west boundary should be reinforced with appropriate additional planting. Tree planting should be proposed throughout the development and along the access roads to help provide softening in views from the wider countryside to the north. Overall the site has a moderate-high capacity to accommodate change.”

Amesbury Community Area topic paper (WC, 2017)

2.15. The assessment which ultimately informs the Allocations Plan is a topic paper produced by Wiltshire Council in June 2017. This identifies a number of benefits to the site, but also contains a number of major inaccuracies that it is incumbent upon us to correct. In the interest of clarity and completeness, the table below comments on each element of the assessment in turn.

Quote from Topic Paper

Response

“The site is likely to be affected significantly by noise and particulate matter pollution emanating from traffic on the A303 and potentially from industrial uses to the south and east of the site.”

The A303 is a consideration however a noise assessment has been undertaken which identifies that suitable levels can be achieved (detailed below). An air quality assessment has not been undertaken as yet, and it is therefore not possible to conclude whether air quality is a significant concern. We would note however that the prevailing winds are away from the site towards the A303, and that adjoining uses are mainly retail and, light commercial (e.g. automotive services), not heavy industry.

“Bearing in mind the juxtaposition of the site and the A303, it is considered unlikely that an appropriate noise attenuation scheme could be achieved due to the topography of the site.”

WC base this on no evidence whatsoever. Lincoln College’s consultants have, however, identified appropriate noise mitigation measures based on actual monitoring data, as set out in the accompanying report.

“An area of Ancient Woodland would need to be protected in totality and protected by a buffer of additional planting within the site.”

This is entirely incorrect. There is no area of Ancient Woodland either on or adjacent to the site.

“There are known barrows and burials on the site and adjacent to the site. Bearing in mind the significance of these archaeological assets further assessment would be required in order to support and inform any subsequent planning application. This may result in the developable area of the site being reduced significantly

This is again incorrect. Whilst there are known barrows to the north of the A303 we are aware of no remains on the site and none were raised during the previous applications. WC do not furnish this assessment with any evidence, and the commentary relating to development area is entirely conjecture.

“Extensive tree planting would be necessary throughout the site in order to soften views from and to the wider countryside. This would be additional to planting needed to enhance existing hedgerows and protect Ancient Woodland. Additional screening may also be required between any new

The need for tree planting is accepted although this commentary significantly overstates the matter of landscape sensitivity, compared with the TEP assessment referred to above. Again, the matter of Ancient Woodland is factually incorrect.

The submitted concept plans address landscape matters effectively and positively.

development and the adjacent industrial uses.”

“The site is a relatively accessible location and within close proximity to employment, retail, education and services within Amesbury town centre, which can also be accessed by public transport”

Quote from Topic Paper

“This is an opportunity that should be maximised”

“The site has an existing vehicular access from London Road at its north eastern corner, but limited cycle connectivity. Development could contribute towards the Wiltshire Council’s proposed - Amesbury Cycle Network and deliver improved pedestrian access to local amenities.”

“Development at this site would have the potential to exacerbate major accident clusters at Countess Roundabout and A345/High St (within 1km of site) and to exacerbate congestion around Countess Roundabout, Countess Road/The Centre, and Solstice Park junctions.”

This is common ground and one of the major advantages of the College site over the two alternatives at Durrington.

Response

We agree with this sentiment and it is therefore unfortunate that WC fail to plan positively and enable this site to come forward and fulfil this potential.

As suggested, the site is capable of contributing to network improvements and benefit the wider population of Amesbury. The potential for this site to promote sustainable modes of travel is significantly higher than both of the alternatives at Durrington.

This is an exaggerated and wrongheaded assessment. The site is close to these locations, however, any allocations of development land at Amesbury/Bulford/Durrington will be within comparably close distance of the same junctions. On the other hand, the College site is far more accessible to services, facilities and employment and is therefore likely to create less vehicular movement overall by encouraging non-car modes of transport. If local highway improvements are necessary to accommodate growth, WC should address this appropriately through their Community Infrastructure Levy. As regards the Countess Roundabout, Highways England proposes a flyover which in the long term would address this issue.

<p>“The site would require extensive landscaping reducing its developable area”.</p>	<p>This is only partially true. The submitted masterplans demonstrate that good use of the site can be made, accommodating the entire target for Amesbury/Durrington/Bulford with additional scope to deliver employment uses.</p>
<p>“It is [a] reasonably well-located site in relation to Amesbury town with the potential to improve cycle/pedestrian links.”</p>	<p>This is correct, but underplays the significant advantage that the site has in terms of accessing retail, services, jobs, public transport and all the other amenities of Amesbury.</p>
<p>“Fundamentally, however, the site is not considered suitable for housing development. Following further consultation and examination of evidence, it is clear that this site has a number of key constraints that ultimately make it inappropriate. The impact of noise from the A303 is not considered possible to mitigate.”</p>	<p>The assessment is unclear here as to what ‘evidence’ has been ‘examined’ in arriving at this assessment. The College presents evidence in this submission that demonstrate noise is capable of being overcome. It is not clear what the other ‘key constraints’ are, however as regards heritage, ecology, and landscape this submission demonstrates that concerns are unfounded.</p>
<p>“In addition this site is likely to be included in plans to widen the A303 and therefore should not be allocated for housing development.”</p>	<p>This is incorrect. There is no proposal to widen the A303 into the College land itself. The A303 is already dualled in this location, and the improvements proposed by Highways England are some distance to the west, relating to the Countess Flyover and tunnel at Stonehenge. Whilst the College, as landowner, has been notified of the adjacent proposals, we have been advised that, as indicated in Figure 2.2 below, there is unlikely to be any requirement for permanent land-take.</p>
<p>2.16. The Topic Paper concludes with the statement that: ‘Based on the evidence gathered to date, particularly in relation to the proposed dualling of the A303, development of this site is not considered suitable. Moreover, environmental effects associated with proximity to the A303 (e.g. noise and air quality impacts) would be highly problematic to mitigate successfully. After further assessment, this site has marginal sustainability benefit, it is not certain that the site is developable, and should not be a preferred site.’</p> <p>2.17 For all the reasons given above this is an inaccurate and incomplete assessment, not based on evidence properly reviewed. [see figure in attachment]</p> <p>3. Proposals for the site</p> <p>3.1. Lincoln College has appointed consultants to undertake a series of technical reviews on the site in order to identify a suitable, sustainable and deliverable masterplan for the site. This has encompassed: Topographical survey (see Appendix); Noise assessment (see Appendix) Urban design assessment;</p>	

Highways / access assessment.

3.2. The starting point for configuring proposed development is to factor in the key opportunities and constraints of the site, which include the following:

a well-located site in terms of containment between built-up features;
proximity /connectivity to key services and facilities of Amesbury;
views to open countryside from site;
potential increased planting on site;
provision of employment to reinforce existing economy of Amesbury;
topography – sloping site;
proximity to A303 to the north with noise effects;
large commercial/industrial buildings to the south;
need to deal with surface water / drainage issues.

3.3 This exercise has culminated in two potential scenarios, summarised below and shown overleaf

	Option A: Mixed-use	Option B: Residential only
Total site area	4.48ha	4.48ha
Net developable area	2.15ha	2.77ha
Indicative residential units (34 dph)	73	94
Indicative total footprint of B1 units	24,000 sq. ft	-

3.4. In both scenarios, the layout of the proposed development is influenced particularly by the elongated shape of the site (east-west) with topographic contours running roughly in parallel to this. Key features of the proposed layout include:

set-back distances from London Road to accommodate access;
buffer from the A303, incorporating acoustic fencing
provision of a suitable access
inclusion of attenuation areas for surface water
substantial tree planting in the relatively inaccessible eastern corner;
the use of split-level units to accommodate level changes in certain locations;
use of perimeter blocks to encourage a 'permeable' layout

[see figures 3.1 and 3.2 in attachment]

3.5. Access to the site is proposed roughly halfway along the frontage to London Road; this being the safest and most deliverable alternative, and preferable in safety terms to the existing field access at the far eastern corner. An initial access drawing is shown below, with a detailed drawing to A1 scale provided as an Appendix.

3.6. Access design has encompassed a number of considerations:

securing suitable visibility lines in both directions;
topographic levels and the desire to minimise embankment works;
deliverability within Lincoln College land (this has been confirmed with the current plans being based on a formal enquiry with Wiltshire Council in respect of where Highway Land is located, in addition to recent Land Registry searches)
pedestrian connectivity, with a link to connect in with the existing crossing at the Tesco Roundabout and a new pedestrian refuge to the east of the site.

[see figure 3.3 in attachment]

Consideration of noise

3.7. Through the Sustainability Appraisal undertaken on the site, adverse noise impacts from the A303 have been identified as a key consideration. Lincoln College therefore commissioned Clarke Saunders Associates to undertake an assessment of the current environmental noise impact on the site, in accordance with the NPPF, the recently published ProPG: Planning and Noise for new residential developments and the relevant guidance set out in BS8233: 2014 Guidance on sound Insulation and noise reduction for buildings and the World Health Organisation Guidelines for Community Noise.

3.8. An initial Stage 1 Risk Assessment (including noise monitoring) has identified the site as a low/medium to medium/high risk area in terms of noise impact during daytime and night-time respectively, following which a Stage 2 Acoustic Design Statement has considered noise impacts in detail, and addresses the requirement for any outline mitigation measures as appropriate for a proposed residential development.

3.9. Appropriate measures have been accommodated in the provisional masterplan to ensure good acoustic design. Consideration has also been made of London Road to the southeast of the site, and the light industrial & commercial units to the southwest. These include:

The potential for acoustic fencing on the northern boundary between the site and the A303;

Plots to the north of the site closest to the A303 have been set back to increase the separation distance from the A303. This buffer zone includes a mix of access road, green spaces, runoff attenuation features, and pedestrian routes.

Plots on the northern side of the site are arranged in terraces or with linked building frontages to provide acoustic screening to private amenity spaces and the rest of the site, reducing the potential impact of road traffic noise from the A303.

Non-glazed building elements of suitable materials and mass have been proposed;

Facades are of a traditional solid construction, with solid roof tiles employed throughout.

Public open space is proposed within the centre and on the southern boundary of the site, where noise levels are expected to be less affected by road traffic noise.

3.10. Overall the assessment has demonstrated that by the use of suitable mitigation measures and careful design of facade performance, layout of the site and internal layout of the dwellings, acceptable noise levels can be achieved both internally and externally. These measures are incorporated directly into the proposed illustrative masterplans, and the acoustic survey reports are included as an Appendix to this submission.

Consideration of topography

3.11. Wiltshire Council had previously indicated in correspondence that the sloping topography of the land renders it inappropriate for further consideration. It is acknowledged that parts of the site are too steep to be developed; certain areas (particularly adjoining London Road) take the form of an embankment. However, the majority of the site is of a gradient that would be developable, and a small number of simple measures would enable the changes in levels to be appropriately accommodated. These include:

retaining the steeper embankment areas (where much of the level changes take place) as greenspace, either as open amenity land or with additional planting. This would further contribute to wildlife connectivity and the amenity of residents, whilst also providing some mitigation against noise and disturbance, particularly from London Road;

arranging streets to follow contour lines;

considering split-level dwellings, i.e. where there are a greater number of storeys on the 'downhill' side than on the 'uphill'.

3.12. Wiltshire Council has routinely granted planning permission for residential developments on sites steeper than the College site; an example being application 14/02043/FUL (Chalk House, Porton), on a site with an average gradient of 1 in 9. This scheme incorporated several split-level dwellings. Redrow Homes' "Wilton Hill" development at The Avenue, Wilton (Salisbury, an allocated site) is a further recent example of a major hillside development.

3.13. In summary, topography is not a defensible basis for excluding this site from consideration in the DPD. An appropriate design solution is capable of being configured, as has been shown.

4. Rationale for allocation

4.1 As noted in the preceding sections, the College land at can be designed and delivered appropriately, and with technical issues overcome. Beyond this, however, are several key strategic factors indicating that the site should be favourably considered in order to achieve social and economic aims

Opportunity to deliver employment

4.14. Uniquely amongst the potential allocation sites in Amesbury/Bulford/Durrington, the College site offers the possibility of delivering a major new area of employment land in an accessible location as part of a mixed-use allocation.

	<p>4.15. Amesbury is already a key centre of economic activity, being strategically placed on the A303 corridor, with Boscombe Down and Solstice Park being two of the largest employment sites in Wiltshire. However, the majority of allocated employment land in Amesbury has now been built out, and although Solstice Park has been successful to some degree it has not delivered employee-intensive end users. The announcement earlier in 2017 of a major new operational base for Boeing at Amesbury is significant; whilst the majority of the expected 1,500 jobs will be at Boscombe Down itself, there is the potential for a range of spin-off activity which may require business space locally.</p> <p>4.16. By allocating the College site for mixed-use, the opportunity arises to provide up to 24,000 sq. ft of new business space within the current plan period, without awaiting a future Core Strategy review. This will be important in order to achieve early progress against several of the key objectives of the Swindon and Wiltshire Local Enterprise Partnership, whose Strategic Economic Plan prioritises “Using our pivotal location in southern England to create wealth, jobs and new business opportunities”, in part by accommodating growth and stimulate the economy in sustainable locations including market towns³.</p> <p>4.17. Mixed-use development on the College site would balance housing growth in a manner that cannot be replicated on either of the alternatives considered, and in addition, the positioning of larger employment buildings close to the A303 could augment noise mitigation for residents further to the south.</p> <p>5. Conclusion</p> <p>5.1. The allocation of the College land for residential-led development would contribute to the social, economic and environmental ‘dimensions’ of sustainability demanded by national and local planning policy.</p> <p>5.2. The Council’s rationale for omitting the site from further consideration is weak, and not supported by evidence. As set out in this document the site is deliverable, and also preferable in many respects to the alternatives identified by Wiltshire Council.</p> <p>5.3. The opportunity should therefore be taken in this Allocations Plan to proactively bring this site forward.</p> <p>The Housing Site Allocations plan should include the allocation of the College’s land at London Road, Amesbury (site 3379), because: The location is acknowledged by WC as sustainable, due to its relationship with the existing built-up area, and its proximity to a wide range of services and facilities; The site is capable of delivering the full housing requirement for the Amesbury Community Area. In contrast, WC’s proposed allocations will underprovide, and on more sensitive land. The site can also deliver a significant element of B1 employment, complementing Amesbury’s role as a key economic hub in the County, which is set to expand with the expansion of Boeing at Boscombe Down; Contrary to the incomplete analysis undertaken by WC, environmental, technical and land constraints on the site are all capable of being overcome. Under the DCLG’s new approach to calculating housing need, Wiltshire needs to increase supply by circa 6% annually. It should also, under the NPPF, plan for up to 15 years ahead whereas the draft Allocations plan extends only to 2026. Positive consideration must therefore be given to sustainable sites such as this. Please refer to the accompanying statement and appendices.</p>
<p>Attached files (Please see Objective)</p>	<p>4744390 / 4744387 / 4744385 / 4744389 / 4744386 / 4744392 / 4744388 / 4744391</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>In order to adequately put forward the case for the proposed allocation of my client’s site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Lincoln College site as an ‘omission’ site.</p>

Comment ID:	3123	Consultee Lincoln College Oxford	Agent Mr Jon Gateley Associate Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 393560	Person ID: 1131505	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Amesbury, Bulford and Durrington		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Ability to deliver the full housing requirement</p> <p>4.2. Table 2.2 of the draft Allocations Plan, confirms that there is a residual requirement at April 2017 for at least 73 dwellings in the Amesbury/Bulford/Durrington grouping. Against this requirement, the plan underprovides with the two proposed allocations totalling only 60 units.</p> <p>4.3. This underprovision is a major flaw in the draft Plan and directly contradicts planning policy at the national level (and within the Wiltshire Core Strategy) which seeks to significantly boost the delivery of housing. For a draft plan to allocate lower than the required level is a fundamental error which exposes the Council to significant risk in terms of its overall soundness.</p> <p>4.4. In contrast the College site offers the opportunity to deliver at least the full requirement of 73 units. As well as being in line with the WCS and National Planning Policy Framework this would have a number of advantages: development could be comprehensively planned and phased; a larger development would enable a mix of types to be brought forward together, including starter homes, family homes, and elderly accommodation; it will be possible to ensure through the application process that designs and styles are high quality, integrated and suited to the area. This is preferable to an ad-hoc approach on many different, unrelated sites; infrastructure, services and improvements can be co-ordinated; the right balance of affordable tenures, dwelling types, and numbers of bedrooms can be provided to specifically meet local needs</p> <p>Requirement for WC to allocate further housing land</p> <p>4.5. The draft Allocations plan has an intended end-date of March 2026, and thus by the time it is adopted (late 2018 at the earliest) it will have an effective period of only around 7½ years. This directly contradicts the NPPF's requirement for authorities to identify a supply of specific, developable sites or broad locations for growth up to years 11-15.</p> <p>4.6. In addition, under the new methodology for calculating housing need, announced by the Secretary of State for Communities and Local Government in September 2017, Wiltshire will in due course be required to plan for a total of 2,227 dwellings per annum, reflecting an uplift of around 6% from the current position.</p> <p>4.7. Wiltshire Council must therefore plan positively, and include within this Allocations Plan a range of deliverable sites that will enable housing needs to be fulfilled, aiming to boost supply. As currently drafted, particularly in Amesbury, the plan would not achieve this. The Housing Site Allocations plan should include the allocation of the College's land at London Road, Amesbury (site 3379), because: The location is acknowledged by WC as sustainable, due to its relationship with the existing built-up area, and its proximity to a wide range of services and facilities; The site is capable of delivering the full housing requirement for the Amesbury Community Area. In contrast, WC's proposed allocations will underprovide, and on more sensitive land.</p>				

	<p>The site can also deliver a significant element of B1 employment, complementing Amesbury's role as a key economic hub in the County, which is set to expand with the expansion of Boeing at Boscombe Down;</p> <p>Contrary to the incomplete analysis undertaken by WC, environmental, technical and land constraints on the site are all capable of being overcome.</p> <p>Under the DCLG's new approach to calculating housing need, Wiltshire needs to increase supply by circa 6% annually. It should also, under the NPPF, plan for up to 15 years ahead whereas the draft Allocations plan extends only to 2026. Positive consideration must therefore be given to sustainable sites such as this.</p> <p>Please refer to the accompanying statement and appendices.</p>
<p>Attached files (Please see Objective)</p>	<p>4744389</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Lincoln College site as an 'omission' site.</p>

Comment ID:	3124	Consultee Lincoln College Oxford Person ID: 393560	Agent Mr Jon Gateley Associate Director Person ID: 1131505	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	Amesbury, Bulford and Durrington				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Pre-eminence of Amesbury compared with Durrington 4.8. The proposed approach in the draft Allocations Plan, to allocate two sites at Durrington but none at Amesbury, runs counter to any rational assessment of the respective roles of the two settlements. Whilst Amesbury, Durrington and Bulford are combined for the purpose of housing targets (Wiltshire Core Strategy, Core Policy 4), the WCS recognises that the three settlements are distinct and play substantially different roles. Paragraph 5.16 of the WCS gives the following description (highlighting added): [refer to extract in attached full representations] 4.9. With regards to Durrington, the above extract acknowledges that it is a large settlement that, relatively speaking, lacks identity. In large measure this is due to the evolution of the settlement through the 20th Century, with successive suburban estates having been added to what was originally a very small village with no commercial/service centre. Population figures published by Wiltshire Council indicate that Durrington grew over seventeen-fold between 1901 and 2011, from 427 to 7,379. The above extract also acknowledges Bulford’s reliance on the other settlements. 4.10. At the 2011 Census, the respective populations of the three settlements were as shown below: [refer to graph in attached full representations] 4.11. Arising from these characteristics, paragraph 5.19 of the WCS refers to the following issues that require addressing during the plan period: 1st bullet point – the need for ‘balanced growth focussed around Amesbury’; 5th bullet point – ‘the need to make Durrington and Bulford more self-contained. They will have more local services and facilities to meet their own needs, meaning that functionally these settlements are less reliant on Amesbury 4.12. Both of these strongly imply that of the three settlements under the ‘Market Town’ cluster, Amesbury is better placed to deliver residential development in a sustainable manner, since a diverse range of higher-order services, facilities, and economic opportunities are available in the town. These notably include: substantial areas of allocated employment land (Solstice Park and Boscombe Down), in comparison with none at either Durrington or Bulford; substantial high street frontage with range of specialist shops as well as professional services including banks/building societies; several major supermarkets (whereas Durrington and Bulford have only local convenience stores) major public library, police and fire stations, and greater range of schools greater range of locations accessible by public transport. 4.13. Overall, Amesbury is plainly the pre-eminent settlement of the grouping with Durrington and Bulford; and as such in fulfilling Core Strategy housing development targets it should be the first priority. The Housing Site Allocations plan should include the allocation of the College’s land at London Road, Amesbury (site 3379), because:			

	<p>The location is acknowledged by WC as sustainable, due to its relationship with the existing built-up area, and its proximity to a wide range of services and facilities;</p> <p>The site is capable of delivering the full housing requirement for the Amesbury Community Area. In contrast, WC's proposed allocations will underprovide, and on more sensitive land.</p> <p>The site can also deliver a significant element of B1 employment, complementing Amesbury's role as a key economic hub in the County, which is set to expand with the expansion of Boeing at Boscombe Down;</p> <p>Contrary to the incomplete analysis undertaken by WC, environmental, technical and land constraints on the site are all capable of being overcome.</p> <p>Under the DCLG's new approach to calculating housing need, Wiltshire needs to increase supply by circa 6% annually. It should also, under the NPPF, plan for up to 15 years ahead whereas the draft Allocations plan extends only to 2026. Positive consideration must therefore be given to sustainable sites such as this.</p> <p>Please refer to the accompanying statement and appendices.</p>
<p>Attached files (Please see Objective)</p>	<p>4744389</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>In order to adequately put forward the case for the proposed allocation of my client's site by exploring the weaknesses of the submission draft document and discussing the benefits of including the Lincoln College site as an 'omission' site.</p>

Comment ID:	3125	Consultee Mr J Robb Managing Director	Agent Mr Murray Walker	Do you consider the draft WHSAP is legally compliant?	
		Marlborough Tiles Limited Person ID: 1137779	Person ID: 1137777	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Marlborough			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Site: Elcot LAne, Marlborough SN8 2AY Malborough Tiles Limited have a site on Elcot Lane, Marlborough that we wish Wiltshire Council to consider allocating in the Plan. We will be promoting shortly this site as a Strategic Housing Land Availability Assessment Site (SHLAA). Please find attached a plan.				
Attached files (Please see Objective)	4749158				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3128	Consultee Church Lane Residents	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132566	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Reason 1: setting of Heritage sites The Wiltshire Core Strategy (WCS) fails to recognise that Church Lane provides a rural setting for 7 Grade II Listed buildings as follows: St Johns Church School and Hall masters dwellings comprising 4 dwellings. (UID1021593), Church of St Johns (UID 1364192), 344 Frome Road (UID 1364193), Rose Villa (UID 1021594) . The WCS also fails to consider Ancient Monument: MWI73579 Water Meadow, West of Upper Studley. EVIDENCE: National Policy Paras 129 and 132, English Heritage and The National Monument Record.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3129	Consultee Church Lane Residents	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132566	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Reason 2: The rural landscape of the area Site 1021 is bordered by an "important" historical hedge as defined by the Hedgerow Act 1997". It is used by 12 different types of bats (including BECHSTEIN). Evidence of this has been passed onto Wiltshire Council and Wiltshire Wildlife Trust. This adds to the need to maintain all the existing hedgerows . EVIDENCE: Recorded data of bat activity, The Hedgerow Act 1997, DEFRA document "Habitat management for bats A guide for land managers, land owners and their advisors" and OS 1890 map and the OS Old Series 1791-1874 map.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3130	Consultee Church Lane Residents	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132566	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Reason 3: Flooding Site 1021 is sited on a flood plain. Information about flooding and Lambrok Stream relevant to the proposed Church Lane development include: the development is partially on a flood zone 1 and extremely close to flood zones 2 and 3. This area of land is on clay and the water table level is always very close to the surface. EVIDENCE: The Environment Agency website www.gov.uk/check-flood-risk identifies the land 100-200m all along either side of this section of the Lambrok Stream to be at HIGH RISK of flooding (27th June 2017). Local evidence includes Heart Radio, Photographs and newspaper reports.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3131	Consultee Church Lane Residents	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132566	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Reason 4: Accessibility The A361 is a blackspot for accidents both "in the dip" where cars currently turn into the country park as well as in the 30mph limit zone further up the hill. There is not sufficient infrastructure in place for the, already busy Frome Road to take more traffic, causing additional pollution, increased journey times, noise and disruption to the environment and local listed buildings. EVIDENCE: 2026 Trowbridge Traffic Model PFA Consulting				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3132	Consultee Church Lane Residents	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132566	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Reason 5: Suitability of the Church Lane site Development on site 1021 was assessed as being the most detrimental when compared to the other 5 SHLAA sites put forward by Wiltshire Council for housing. Each site was assessed against the following headings Bio-diversity, Water, Historic Environment, Landscape, Accessibility, Education and Housing/ Employment provision. EVIDENCE: Atkins "Wiltshire Housing Site Allocations Plan" Review document				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3133	Consultee Church Lane Residents	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132566	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Reason 6: Contradictions between the Core Strategy and National Planning Policy We believe that WC should utilise all of the Brownfield sites that are available in Trowbridge so that development is not carried out in inappropriate areas. Alternative sites include: Former council offices, East Wing, Bowyers, Margaret Stancomb School, Virgin Site, Ashton Street centre and The John Bull site. EVIDENCE: Town Council Housing Site Allocations Plan Briefing Report 5th September 2017 "Is it really worth all this grief for just 45 houses?"</p> <p>Dear Baroness Scott,</p> <p>Draft Wiltshire Housing Site Allocation Plan Please find attached a summary of our feedback to the above plan as part of the consultation period. It relates to Site 1021, Church Lane development of 45 dwellings.</p> <p>Kind Regards,</p> <p>On behalf of The Church Lane Residents</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3134	Consultee Mr Timothy John-Garrett Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119640	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Proposed Land for the Development of Houses at Southwick Court</p> <p>This letter briefly highlights a few points in opposition of the development of land for houses at Southwick Court; firstly presenting the insufficient transport infrastructure. A road for the use of the new houses has been proposed to join Balmoral Road, and therefore traffic from the new houses will use Silver Street Lane to travel to either Bradley Road or Frome Road. However as Bradley Road is already a very heavily used road, as is Frome Road, with Silver Street Lane becoming increasingly busy, any new traffic from Balmoral Road, will lead to severe congestion of Bradley and Frome Road respectively. A second problem that will inevitably arise from new houses, due to more traffic and people, is the need for new schools and the requisite parking for parents on the school run. The two primary schools likely to be used by new residents of the proposed houses are Southwick and the Grove Primary school respectively; of which the latter school has already met its carrying capacity. Regarding the parking issue, there is a paucity of parking for parent's cars at the Grove primary school such that the parent's park their cars as far down as along Silver Street Lane. The parking of more cars by parents can only exacerbate an existing problem of this parking of cars along Silver Street Lane. This problem being that cars travelling along Silver Street Lane have to negotiated a large number of these parents' cars, whilst simultaneously having to avoid traffic coming from the opposite side of the road; this will lead to much congestion along Silver Street Lane.</p> <p>Another problem that may arise from the new houses is their close proximity, and therefore the house's residents, to the solar farm in the field next to Knapp's Cottage. As new families will move into some of the new houses, it is quite foreseeable that the solar farm will present a very real danger to anyone daring enough to enter the fence behind which are the solar panels.</p> <p>A last issue is that the fields on the proposed sight of development are prone to flooding during periods of heavy rainfall, this can be verified as a problem by residents close to the proposed development site, such as those who own Bramble Farm. As concrete, being a non-porous material, is far for likely to promote flooding than the present soil and plants of the fields that aid in reducing flooding, any development has the potential to invite flooding.</p> <p>Finally, Southwick Court is a grade II listed building, and it is all very well grade listing a building, but constructing new houses so close to the Court will make a farce out of the grade listing system. This is especially true when considering some of the features belonging to Southwick Court, such as the double storey gatehouse and the moat; which will be directly next to any new houses.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3135	Consultee Mr Timothy John-Garrett Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119640	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This letter briefly highlights a few points in opposition of the development of land for houses at Southwick Court; firstly presenting the insufficient transport infrastructure. A road for the use of the new houses has been proposed to join Balmoral Road, and therefore traffic from the new houses will use Silver Street Lane to travel to either Bradley Road or Frome Road. However as Bradley Road is already a very heavily used road, as is Frome Road, with Silver Street Lane becoming increasingly busy, any new traffic from Balmoral Road, will lead to severe congestion of Bradley and Frome Road respectively.</p> <p>A second problem that will inevitably arise from new houses, due to more traffic and people, is the need for new schools and the requisite parking for parents on the school run. The two primary schools likely to be used by new residents of the proposed houses are Southwick and the Grove Primary school respectively; of which the latter school has already met its carrying capacity. Regarding the parking issue, there is a paucity of parking for parent's cars at the Grove primary school such that the parent's park their cars as far down as along Silver Street Lane. The parking of more cars by parents can only exacerbate an existing problem of this parking of cars along Silver Street Lane. This problem being that cars travelling along Silver Street Lane have to negotiated a large number of these parents' cars, whilst simultaneously having to avoid traffic coming from the opposite side of the road; this will lead to much congestion along Silver Street Lane.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3136	Consultee Mr Timothy John-Garrett Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119640	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	A last issue is that the fields on the proposed sight of development are prone to flooding during periods of heavy rainfall, this can be verified as a problem by residents close to the proposed development site, such as those who own Bramble Farm. As concrete, being a non-porous material, is far for likely to promote flooding than the present soil and plants of the fields that aid in reducing flooding, any development has the potential to invite flooding.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3137	Consultee Mr Timothy John-Garrett Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119640	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Finally, Southwick Court is a grade II listed building, and it is all very well grade listing a building, but constructing new houses so close to the Court will make a farce out of the grade listing system. This is especially true when considering some of the features belonging to Southwick Court, such as the double storey gatehouse and the moat; which will be directly next to any new houses.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3138	Consultee Mr J Stratton Land at Codford	Agent Mr Diccon Carpendale Brimble Lea and Partners	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1137830	Person ID: 1122261	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		SHLAA Site 612 Codford, Warminster Community Area Topic Paper		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Within the Warminster community area topic paper SHLAA site 612 (Chitterne Road) was positively assessed against the exclusionary criteria and recommended to be taken forward for further consideration.</p> <p>Under the next stages the site was carried forward to stage 3.</p> <p>This representation should be treated as an objection to Codford being discounted as a location for housing site allocations and, in particular SHLAA Site 612 (Chitterne Road).</p> <p>It has been noted from the Warminster Community Area Topic Paper June 2017 that SHLAA Sites in Codford were rejected at Stage 3 of the site selection process with the stated reasons in Table 6.5 being because of major adverse effects associated with River Avon SAC.</p> <p>On this basis, the Habitat Regulations Assessment June 2017 has been reviewed to provide an insight for these summary reasons for rejecting the sites at Stage 3. In the case of Codford, the settlement level screening assessment (Table 4) identifies the Likely Significant Effects (LSE) which are addressed below. Table 4 identifies a LSE for criterion W1 (Water Extraction – River Avon SAC) although the assessment results only identify potential problems in the village of Shrewton. As such, Table 4 should be modified accordingly for Codford by being coloured green with the capital letter N. Otherwise, Warminster also fails on this LSE.</p> <p>Salisbury Plain Special Protection Area (SPA) – Criterion R1</p> <p>Codford has been discounted at Stage 3 on the basis that the settlement is within 6.4km of the Salisbury Plain SPA, being the distance where the majority of visitors to the SPA originate. However, this reason cannot be substantiated on the basis that Warminster is also within 6.4km of the SPA where a significant amount of new development is being focused. This will have a much greater impact than the level of development that could be achieved in Codford, and analysis elsewhere in the Habitat Regulations Assessment and the Sustainability Appraisal demonstrates that there is scope to mitigate the impact of any additional recreational pressure upon the SPA. There is no evidence to suggest that the Stone Curlew Mitigation Strategy identified in the Core Strategy, which was developed for the established housing requirements and are not changing as a result of this Site Allocation Plan, would be ineffective. As such, development in Codford as a matter of principle will not have any LSE on this SPA.</p> <p>Phosphate – River Avon SAC – Criterion P1</p> <p>Codford has been discounted at Stage 3 on the basis that there is no mains sewage infrastructure, and would therefore expect any new development to have a package treatment plant which, according to the assessment, would typically discharge to the river at much higher phosphate concentrations than main sewage treatment works.</p> <p>There is no evidence that a package treatment plant would typically discharge to the river at much higher or, importantly, unacceptable Phosphate concentrations than mains sewerage treatment works. This is confirmed in the “Phosphorous in Package Treatment Plant Effluents” report by May & Woods in 2016, which was commissioned by Natural England (Number 221). This research was inconclusive regarding pollution from package treatment plants and concluded that a better understanding is required. Package treatment plants are subject to strict environmental permitting controls by The Environment Agency and this LSE on the SAC, which is assessed as being high risk, has therefore</p>				

	<p>been wildly exaggerated at this plan-making stage. Mitigation would be a site specific consideration through the decision-making process, with evidence accordingly.</p> <p>On this basis, it is considered that the plan is unsound and has not been positively prepared with a proper/proportionate consideration of the evidence base. A further review/assessment should be undertaken recognising that having addressed the issue of impact upon the SAC (this should not be considered a reason for opposing any further growth at Codford which would effectively stifle the future growth and sustainability of services within the village. Also, it will be noted within the site specific assessment for site 612 that any other impacts are assessed as being capable of being satisfactorily mitigated. Overall the site is extremely well related to existing built form and would comprise a modest (as in favoured within the supporting documentation) sized site and a logical rounding off of development within this part of the village.</p> <p>There is an additional site (as yet unassessed) as marked edged red on the Codford inset map attached which should also be given favourable consideration under the review process.</p> <p>The evidence base advanced in support of the plan (and in this instance the Warminster community area topic paper) is flawed and needs to be reassessed with proper/ proportionate consideration being given to those sites carried forward to stage 3. Of these site 612 is modest and well related to the existing settlement and capable of on site mitigation in relation to site specific matters identified through the process.</p> <p>Unless the plan is reappraised, it is clearly subject to challenge of being unsound in this regard.</p> <p>Throughout the plan (and in relation to other settlements not subject to this objection) a similar approach has been taken where a single issue (potentially capable of resolution with further careful Consideration or mitigation) has been used as a reason to exclude any further growth at a large village. Clearly this will have major and adverse impact upon the future sustainability of that settlement.</p> <p>Through this inappropriate application of evidence/data there are significant failings within the assessment process. The plan (and in this instance the part relating to the Warminster community area and, more specifically, the village of Codford) will need to be reappraised. Having done so it will become clear that site 612 is ideal for being recommended for allocation for a modest housing development.</p> <p>There is an additional site (as yet unassessed) as marked edged red on the Codford inset map attached which should also be given favourable consideration under the review process.</p>
Attached files (Please see Objective)	4745149
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3139	Consultee Mr Michael Rennie	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 396076		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.2		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Not using 'brownfield' sites in Trowbridge. Overloading of existing roads which are totally inadequate now let alone with this planned. Where are the employment sites for these houses - Bath? Bristol, Chippenham? (more traffic commuting, etc.). Villages on perimeter behind swallowed up gradually and choked with traffic, and losing identity. Better use of existing sites in around Trowbridge, e.g. Bowyers, District Council sites, etc. Why is green belt land is allocated to space between Trow and B.O.A. yet none on North, east or South East areas? Really object to 298 site development re North Bradley - losing identity and traffic overload.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3140	Consultee Keysley Ltd	Agent Mr Cliff Lane Savills Planning	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137935	Person ID: 556489	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		5.22			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<ul style="list-style-type: none"> • Replace Market Lavington in para 5.22 with Warminster which is an obvious mistake. 				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3141	Consultee Castlewood Properties Ventures Ltd	Agent Mr David Wetherill Senior Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137984	Turley Person ID: 1130975	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	States that Wiltshire does not have a 5 year housing land supply and therefore the capacity at allocations should be increased - see attachment for details.				
Attached files (Please see Objective)	4745895				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3142	Consultee Castlewood Properties Ventures Ltd	Agent Mr David Wetherill Senior Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1137984	Turley Person ID: 1130975	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Supports allocations 2.2 in principle but considers restricting development to the north east of the site to be unduly restrictive. Visual separation from North Bradley can be maintained alongside a more extensive development. See attached representation for further detail.				
Attached files (Please see Objective)	4745895				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3143	Consultee Messrs Roger and Mark Dykes Person ID: 1138497	Agent Jeremy Flawn Bluestone Planning Person ID: 836762	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The forms indicate that the Plan is considered to be both unsound and not legally compliant. The reasons for reaching this conclusion are as follows:</p> <p>Legal Compliance and Soundness Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment and the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) require the consideration of 'Reasonable Alternatives' in determining which sites to allocate in a Plan.</p> <p>In this case land at Fyfield (see enclosed Location Plan) is demonstrably a reasonable alternative to those considered by the Council and should have been assessed as part of the Sustainability Appraisal process. Furthermore, it is contended that the consideration of this site as a reasonable alternative should have led to the allocation of the site for residential development. These omissions mean that the Plan is legally non-compliant and it is not sound because there has been a failure to consider reasonable alternatives, with the effect that the Plan fails to deliver the most appropriate strategy when considered against reasonable alternatives.</p> <p>To remedy this significant flaw in the process, the Council must re-consider its approach to meeting the needs of the Marlborough Community Area, including the assessment of land at Fyfield as a reasonable alternative to the options already identified and assessed. Allowing a small-scale site to be allocated for local (market and affordable) housing needs at Fyfield would be consistent with Core Strategy Core Policy 1 which states that "Development at Large and Small Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities." As such it would therefore also be consistent with the principles of sustainable development.</p> <p>In addition to the above concerns, the Plan is also considered to be unsound because it fails to properly consider the most sustainable approach to meeting the objectively assessed needs of the Marlborough Community Area (CA). There is a projected under-provision of houses in the Remainder of the Marlborough CA (-14.1%). The Plan fails to make provision for this under-supply, thus undermining the delivery of the Plan's strategy and putting at risk the proposals to meet the Planning Authority's and the CA's objectively assessed needs. The justification for not allocating any sites is set out in the Marlborough Community Area Topic Paper that supports the emerging Site Allocations Plan. It states (7.2): "There is an indicative residual requirement of 34 dwellings for the Marlborough Community Area Remainder to be delivered during the Plan period. However, a main purpose of the Plan is to ensure a surety of housing land supply. To a significant degree this objective is already met for the East Wiltshire HMA. There is therefore no strategic priority to allocate sites for housing land at Large Villages where scales of housing are intended to only meet local needs. The priority for planning control to pass to the local communities to develop their own vision for the future of their area takes precedence. Local needs can be addressed through neighbourhood planning. Large Villages in the East Wiltshire HMA are therefore removed from 'areas of search'. Therefore, the Plan will not need to allocate additional land to help meet an indicative residual requirement. It is proposed that housing sites will not be identified for allocation within the Marlborough Community Area Remainder and the site selection process ends after Stage 1."</p>				

	<p>This is a significant failure to properly plan for meeting the objectively assessed needs of the Plan and the Community Area. Aiming to 'only just' achieve the target figures set out in the Core Strategy is not boosting significantly the supply of housing (NPPF para. 47) and risks longer term problems in maintaining a five year supply of housing land with little or no margin for error. In order to remedy this failing, the Plan should provide for the allocation of additional sites, to ensure that the Plan is based upon a strategy that is capable of meeting objectively assessed needs of the Plan area and the CA of Marlborough. Land at Fyfield should be allocated as a housing allocation in order to assist in meeting the Council's objectively assessed needs. Land at Fyfield is available, deliverable, and its development would help to consolidate existing dispersed development at Fyfield. It is a site which can be assimilated well into the edge of the settlement with appropriate landscaping. A suitable access into the site can be achieved via the road through the village, without giving rise to harm to highway safety.</p> <p>See attached rep for map of omission site land at Riverdell Farm, Fyfield</p>
<p>Attached files (Please see Objective)</p>	<p>4749404 / 4749398</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>In order to test the evidence provided by the planning authority.</p>

Comment ID:	3144	Consultee Ms Alice Brighton WelbeckStrategic Lan II LLP	Agent Mr Ed Heynes Heynes Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138002	Person ID: 1138006	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Omission site - Land at North Bradley, Nr Trowbridge		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The purpose of the Plan is set out at paragraph 1.1. In summary, the objective is to i) allocate new sites for housing to ensure delivery across the Plan period up to 2026;; and, ii) revise settlement boundaries. We are aware that the Plan builds upon the strategic framework provided by the Core Strategy which was adopted in January 2015 and it should be read in conjunction with that document and the Chippenham Site Allocations Plan. At paragraph 1.6 it states that “ Housing allocations have been made in general conformity with the settlement strategy outlined in Core Policy 1”.</p> <p>In the context of land being allocated for housing, this representation focuses on land at North Bradley. The site has not been the subject of representations by our Client previously (or by the relevant landowner as far as we are aware) in relation to previous versions of the Plan and/or any Call for Sites as part of the compilation of the Council’s Strategic Housing Land Availability Assessment. We are therefore submitting representations in relation to the site with the intention that it be included within the Plan as an allocation for housing.</p> <p>a) The Proposals</p> <p>In support of the representation we attach a copy of a pre-application enquiry to the Council. dated 1st September 2017. Accompanying the letter is a Masterplan, reference 7783 L 05. The letter and plan propose a scheme comprising, in the main, of residential development of up to 95 units together with a small scale local shopping facility. Appropriate supporting infrastructure is also proposed. The site is very well related to North Bradley and has access to local services and facilities. There is an opportunity for this scheme to create a sustainable development.</p> <p>The pre-application enquiry information confirms the nature and extent of the proposed development;; the position regarding the availability of the site and the fact that it is deliverable (a key consideration in establishing which sites should be brought forward as housing allocations). It provides information in support of our representation. Further, there is an explanation of how the scheme could be brought forward in the context of any site constraints and opportunities. The examination of relevant technical issues and how they can be addressed as part of the delivery of the scheme is important as it will give confidence that the site can be allocated.</p> <p>Therefore, we consider that the site should be included within the Site Allocations Plan. It can contribute towards meeting Wiltshire’s housing requirement as set out in the Core Strategy and a five year supply of deliverable sites over the Plan period. Its exclusion from the Plan means that we raise objection to it as it stands at present.</p> <p>Planning Justification</p> <p>Before making comments in respect of the site and its attributes we wish to make brief representations regarding the strategy for the delivery of sites within the Plan. [see other representations]</p> <p>As stated earlier, the Council has identified sites through a process of evaluation. The selection process is set out in Topic Paper 2. Each site as part of its evaluation has been assessed against agreed sustainability criteria (Stage 3). The ‘Sustainability Objectives’ are set out in Table 5.1 of Topic Paper 2. We have reviewed the objection site against those criteria. As we have yet to complete our final technical assessment of the site we have been unable to complete a full evaluation against the criteria (nos. 1 to 12) as set out. However, from the work undertaken so far and</p>				

	<p>having regard to the information provided in the pre- application enquiry letter (submitted with this representation) [see attached and other representations] we consider that in general terms the site performs as well and in some cases better than those sites proposed for allocation. We have reviewed the allocations proposed in terms of their suitability to come forward. It is noted that:</p> <p>The sites being on the edge of the built up area of Trowbridge have reasonably good access to services and facilities;;</p> <p>All involve the development of greenfield sites;;</p> <p>A number of the sites have a collection of potentially difficult technical issues to deal with in terms of ensuring that the development results, overall, in no significant adverse impact. Heritage, ecological, drainage and access issues affect most sites;;</p> <p>Five of the six sites are on the southern side of Trowbridge. If brought forward they would significantly close the 'gap' between the town and the villages to the south of Trowbridge, in particular, North Bradley;;</p> <p>In allocating the sites reference has been made to the number of units/density being reduced. Has that reduction been agreed with the relevant landowner/promoter? and,</p> <p>Four of the sites have a capacity (for the purposes of the allocation) of over 150 units. Should any one of those sites not come forward that leaves a significant deficit regarding delivery and meeting local needs in and around Trowbridge.</p> <p>By contrast the site at North Bradley offers the following:</p> <p>Providing development that will address ongoing local housing needs over the Plan period;;</p> <p>Provide a scheme of circa. 95 units residential units;;</p> <p>Providing a local retail facility that would improve local shopping provision with added community benefits;;</p> <p>Providing development that has access to local services and facilities by bus, cycling and walking;;</p> <p>Provide development on a flat greenfield site that is free from any significant constraint. There are technical issues/constraints that need to be addressed as set out in the pre-application enquiry letter dated 1st September 2017. However, none of these issues are out of the ordinary and are 'typical' of a development of this nature;; and,</p> <p>Development on the south western side of the village avoids encroachment towards Trowbridge so avoiding a potential for merging (at a later date) of the two settlements.</p> <p>Having regard to the fact that the site is not allocated then objection is raised to Policy H2 of the Plan. The site should be included in the list of allocated sites, given its own reference no. and description.</p> <p>Conclusion</p> <p>We consider it appropriate to bring the site forward within the Plan. The allocation of this site would represent sustainable development in the context of the NPPF. We consider that for the reasons as set out in this letter it offers both a viable alternative to other sites identified in the Plan at Trowbridge or noting the desire of the Council to apply a robust approach to providing a five year supply of deliverable sites throughout the Plan period, it would be an appropriate addition.</p> <p>As stated earlier we have reviewed the Plan having regard to the tests of soundness as set out in paragraph 182 on the NPPF. In respect of the test as to whether the Plan is justified then we consider that it fails and is unsound as the Plan has not adopted the most appropriate suitable strategy for the distribution of housing when considering the reasonable alternatives. It cannot therefore be considered to be neither justified or effective.</p>
<p>Attached files (Please see Objective)</p>	<p>4746726 / 4746728 / 4746741 / 4746727 / 4746729</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>We wish to be kept informed of the progress of the Plan and support our objections at the forthcoming Examination into the Plan. The Plan as presented (under regulation 19) does not present the most effective strategy to deliver development to meet the needs of Wiltshire. We need to present our representation orally to fully explain why this is the case and proposed changes to make the Plan sound.</p>

Comment ID:	3145	Consultee Ms Alice Brighton WelbeckStrategic Lan II LLP	Agent Mr Ed Heynes Heynes Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138002	Person ID: 1138006	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>As stated earlier, paragraph 1.6 of the Plan states that it is in general conformity with the Core Strategy. It needs to be in terms of providing sufficient land to meet the agreed housing requirement (as set out in the Core Strategy) and, most importantly, in order to provide a five year supply of housing land as set out in the NPPF.</p> <p>In terms of the spatial strategy of the Core Strategy and in establishing how the overall housing requirement may be met and in seeking to achieve a five year housing land supply the Plan refers, in Chapter 4, to the minimum amount of housing to be allocated (Table 4.1). It states at paragraph 4.2 that a surplus is needed “to maintain five years supply of housing land in each HMA and to surpass the buffer in excess of five years required by the NPPF.” This is re-iterated in Topic Paper 4, paragraph 1.5. We support this strategy but highlight the need for the Council to be robust in its approach so that sufficient land is indeed allocated. This is important noting that the Council has a history of being unable to achieve a five year housing land supply, at least in the North and West Wiltshire NMA.</p> <p>The different components of supply are set out at Table 4.7. The North and West Wiltshire HMA has, by far, the biggest housing apportionment. The number of units to be allocated in the Plan result, in part, from understanding the amount remaining to be identified including completions, commitments and a windfall allowance. As stated in Topic Paper 3, paragraph 3.10, the latest confirmed housing land supply position is presented in the update to the 2016 Housing Land Supply Statement (March 2017). The Council go on to say they have estimated the 2017 base date housing land supply position to inform the Plan.</p> <p>In our view, it is important to understand the most up to date position on confirmed evidence and would expect an update to be published before the Plan is actually examined. With that in mind we do not intend examining figures in great detail at this stage except to say that whilst we understand that the housing requirement has been established through the Core Strategy and therefore remains unaltered (understandably) through the process of allocating sites through the Plan, the number of commitments and windfalls may alter.</p> <p>The supporting evidence to the Plan examines the contribution commitments and windfalls make to meeting the housing requirement. Notwithstanding the fact that some resilience testing has been undertaken, we urge caution in terms of placing too much reliance on these components of supply. As stated earlier, the Council has recently not been able to achieve a five year housing land supply in the North and West Wiltshire HMA in recent years. The figures for commitments and windfall sites are significant and we have concern that there is potential for a significant proportion of those sites not to come forward. Further it is acknowledged that in Wiltshire a number of large, mixed use sites make up a significant component of supply in each HMA (Topic Paper 4, paragraph 1.5). Our experience of these sites is that they are slow to deliver. They are affected by commercial considerations and minor fluctuations in the economy. That being the case, it gives weight to the justification for giving priority to allocating sites that are known to comprise, in the main, housing.</p> <p>The introduction of a series of Community Areas within the Core Strategy ensures local needs are met which is important given the geographical extent of Wiltshire. In our opinion, delivery and meeting local needs should be the key considerations when identifying sites (housing allocations) for development in the Plan.</p>				

Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>We wish to be kept informed of the progress of the Plan and support our objections at the forthcoming Examination into the Plan.</p> <p>The Plan as presented (under regulation 19) does not present the most effective strategy to deliver development to meet the needs of Wiltshire.</p> <p>We need to present our representation orally to fully explain why this is the case and proposed changes to make the Plan sound.</p>

Comment ID:	3146	Consultee Ms Alice Brighton WelbeckStrategic Lan II LLP	Agent Mr Ed Heynes Heynes Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138002	Person ID: 1138006	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Selection		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In terms of the identification of sites, there is much discussion in the evidence regarding exactly where sites should be located in terms of the size/characteristics of settlements. In respect of Large Villages (of interest to our Client given the status of North Bradley) Topic Paper 4 states that resilience testing has established development at large villages should be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. (Topic Paper 4, paragraph 2.16). It goes on to say that the Neighbourhood Plan process is the most appropriate means of assessing local needs and plan growth at Large Villages.</p> <p>North Bradley sits in the Trowbridge Community Area remainder. The Trowbridge Community Area Topic Paper at paragraph 2.10 states that as there has been more delivery than expected no further allocations are necessary. We have concerns regarding this approach which should be treated as objections to the Plan.</p> <p>First, a failure to deliver any further housing in a remaining part of a Community Area ignores the fact that housing needs will continue to evolve. Whilst purely in quantitative terms sufficient housing may have been delivered such that housing targets are met, there will be an ongoing need, particularly for affordable housing. The indicative residual requirement of 23 units to be provided between 2017 and 2026 is unlikely to meet any significant needs.</p> <p>Whilst the Council rely on the Neighbourhood Plan process to deliver future housing in recognition of ongoing local housing needs, there is no certainty that a Neighbourhood Plan is going to come forward. In Table 2.3 of the Community Area Topic Paper it provides the latest position regarding the North Bradley Neighbourhood Plan. There is no evidence to suggest that it is going to be delivered in the short or medium term. That is not, in any way, a criticism of the progression of the Plan as there are many factors that can influence its delivery. However, we are concerned that no future housing (up to 2026) in the form of site allocations within which, in our view, there is the greatest opportunity to provide affordable housing have been identified. With no allocations being provided then this will potentially not lead to local needs being met.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>We wish to be kept informed of the progress of the Plan and support our objections at the forthcoming Examination into the Plan. The Plan as presented (under regulation 19) does not present the most effective strategy to deliver development to meet the needs of Wiltshire. We need to present our representation orally to fully explain why this is the case and proposed changes to make the Plan sound.</p>				

Comment ID:	3147	Consultee Ms Alice Brighton WelbeckStrategic Lan II LLP	Agent Mr Ed Heynes Heynes Planning	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138002	Person ID: 1138006	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Site Selection		Justified	
				Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Second, there seems to be a lack of recognition in the Plan of the relationship of Trowbridge to surrounding settlements and in particular North Bradley. North Bradley is a short distance from the built up area of Trowbridge and there is potential for a site (or sites) around the village to i) assist in meeting Trowbridge's needs and ii) perform as well as those that simply sit on the edge of the town.</p> <p>The sites to be allocated are identified in the Plan. The evidence supporting their allocation is contained within a number of documents but of particular relevance is the Trowbridge Community Area Topic Paper. In terms of site selection, all sites under consideration have been through the process set out on the diagram after P.11. There has been a reliance on SHLAA sites to identify appropriate sites for allocation however the site at North Bradley has not been the subject of a SHLAA submission as stated earlier. Through a 'sifting' site selection process (set out in Topic Paper 2) the allocated sites are confirmed in Table 5.7 of the Community Area Topic Paper.</p> <p>The justification for including these sites is set out in the remainder of the document including appendices. It is relevant to note that in the Conclusions at P.107 it states "Whilst they i.e.seven sites considered in the final stage of the selection process would not be capable of delivering all the indicative housing requirements for the town, they would nonetheless positively contribute towards meeting some of the indicative shortfall." We are therefore concerned that in not meeting the shortfall, the delivery of sites does not deal with the fully assessed needs of Trowbridge. Not enough housing is identified as being capable of being delivered with any great certainty. Whilst windfall sites may be relied upon to make up the shortfall it is better for the windfall allowance to create that extra supply (on top of the housing requirement being met through confirmed commitments including housing allocations) particularly as it sees the housing requirement as being a minimum.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>We wish to be kept informed of the progress of the Plan and support our objections at the forthcoming Examination into the Plan. The Plan as presented (under regulation 19) does not present the most effective strategy to deliver development to meet the needs of Wiltshire. We need to present our representation orally to fully explain why this is the case and proposed changes to make the Plan sound.</p>				

Comment ID:	3148	Consultee Ms Alice Brighton WelbeckStrategic Lan II LLP	Agent Mr Ed Heynes Heynes Planning	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138002	Person ID: 1138006	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.50 North Bradley Settlement Boundary		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Finally, we note that settlement boundaries are reviewed in the Plan. These boundaries appear not to take account of the allocations. We object to the Plan on the approach taken. Settlement boundaries should reflect allocations so as to ensure delivery. If the site at North Bradley were to be allocated then the relevant settlement boundary plan should be amended.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		We wish to be kept informed of the progress of the Plan and support our objections at the forthcoming Examination into the Plan. The Plan as presented (under regulation 19) does not present the most effective strategy to deliver development to meet the needs of Wiltshire. We need to present our representation orally to fully explain why this is the case and proposed changes to make the Plan sound.			

Comment ID:	3149	Consultee Mr Alastair Page	Agent Mr Chris Dance Associate	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1138113	LPC (Trull) Ltd Person ID: 899110	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		North and West HMA		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is absolutely fundamental that the Housing Site Allocations Plan assists the Government's Objective, as set out in paragraph 47 of the National Planning Policy Framework to "boost significantly the supply of housing".</p> <p>Core Policy 2 of the Wiltshire Core Strategy requires that a minimum of 42,000 dwellings is provided for within the period 2006 and 2026. Furthermore, when the Core Strategy was adopted in 2015 a key element of the housing delivery strategy was the provision of a significant amount of the minimum 42,000 through the Housing Site Allocations Plan.</p> <p>It is clear that new housing should be located in sustainable locations. In this respect it is highly material to note that as part of the preparation for the Core Strategy the Council undertook a Strategic Housing Land Availability Assessment (SHLAA). The land at The Grange (as shown on the enclosed Location Plan) is identified as Site Reference 291 in the SHLAA where under the detailed assessments of the SHLAA analysis, "Potential Suitability Constraints" show no prohibitive factors and under "Suitability" the assessment is suitable.</p> <p>The land at The Grange was also subject to a recent planning application (Ref: 16/01633/OUT) for the erection of up to 26 dwellings. Following as decision by the Council to refuse planning permission the decision was appealed and a decision issued in August of this year. (NB, it should be stressed that this decision is subject to a current legal challenge).</p> <p>The Inspector assessed the suitability of the location for new residential development and concluded that it was indeed in a suitable location. This was the same judgment as an Inspector who allowed an Appeal in December 2014 (Ref: 13/06879/OUT) for the erection of 15 dwellings on land immediately to the east of the land at The Grange.</p> <p>The Appeal for the land at The Grange was dismissed due to the Inspector's concerns about the "less than substantial" harm to the character of the Hilperton Conservation Area due to the loss of the gap on the south side of Devizes Road. This concern, however, should not negate the potential for some form of development on the land (which in my view can be suitably designed in terms of its layout, form and landscaping to ensure that the character of the Conservation Area is not harmed.).</p> <p>Enclosed with this submission is a document titled, "Proposed Settlement Boundary Alteration". Plan 1 shows the context of the land at The Grange, the land immediately to the east which has planning permission for the erection of 15 dwellings, the current Settlement Boundary and the minor revisions which are currently being proposed.</p> <p>The land at The Grange is readily deliverable and there are no site constraints to prevent it coming forward immediately for development. It is unquestionable that it's sustainable credentials score highly, as recognised by the Council's appraisal of the site during the SHLAA process leading to the adoption of the Core Strategy, the Appeal decision in December 2014 on the land to the east, and the appraisal by the Inspector in the recent August decision relating to the site.</p> <p>For the Housing Site Allocations Plan to be sound it is only right that land which is in a sustainable location, and deliverable / achievable, should be brought forward for development.</p>				
Attached files (Please see Objective)	4747380 / 4747383 / 4747384				

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

To articulate to the Inspector why it is appropriate to allocate the land at The Grange, Devizes Road, Hilperton within the Settlement Boundary for Hilperton.

Comment ID:	3150	Consultee Gleeson Developments Ltd	Agent Mr Martin Miller Technical Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 817896	Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Entire Plan / Overarching comment		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Principal Concerns</p> <p>Terence O'Rourke Ltd has been appointed by Gleeson Development's Ltd (Gleeson) to respond to the current consultation on the draft Wiltshire Site Allocations DPD (the draft DPD). Gleeson retains land interests in a number of sites at different settlements across Wiltshire, which offer the opportunity to secure sustainable plan led development.</p> <p>This representation deals with a number of concerns principally:</p> <p>The DPD has not been brought forward in the way envisaged when the Core Strategy inspector found the Core Strategy to be sound, particularly with respect to meeting the objective assessment of housing need (OAN). This is inconsistent with the NPPF.</p> <p>The evidence base is insufficient, in particular the sustainability appraisal and the topic papers have not been positively prepared because the Council started from a point of not assessing all of the opportunities for sustainable development across Wiltshire as part of the process.</p> <p>The output is that reasonable alternatives have not been considered.</p> <p>Also, that the plan will not be resilient and will be ineffective in meeting housing need, including addressing affordability issues.</p> <p>Overall the plan cannot be considered sound as it is not positively prepared, justified or consistent with national policy.</p> <p>Site-specific representations, and the justification as to why various sites should be allocated in the draft DPD, have been provided separately.</p> <p>Positively prepared</p> <p>Paragraph 47 of the Framework states that a Local Plan should meet the full objectively assessed needs for market and affordable housing in the relevant HMA as far as is consistent with the other policies of the Framework. There has been no attempt in the draft plan to meet the objectively assessed need (OAN) as set out below.</p> <p>The Wiltshire Core Strategy Inspectors report at paragraph 78 identified the OAN as around 44,000 and later in paragraph 80 stated "... the sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly".</p> <p>The inspectors report goes on to state "Indeed, I am particularly mindful that the Council intends to produce a new SHMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes. Consequently I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more".</p> <p>As stated this was the 'minimum housing figure' and is not the OAN. The Inspector was expecting a revised SHMA with a new OAN in early 2016 and clearly set an expectation that Wiltshire Council should be planning, through subsequent DPDs, to meet this OAN as well as the 'Swindon allowance' (900 homes) because the latter does not meet the housing needs Wiltshire. No updated SHMA with revised OAN has been published to date. Nevertheless, the most recent evidence, as reported to the Swindon Wiltshire Local Enterprise Partnership on 14 February 2017 and correlating with the Government's recently published OAN figures using a standard methodology (currently subject to consultation), is that the OAN remains at or above 44,000 homes across a 20 year period.</p>				

It is surprising that the consultation document makes no mention of these requirements, set by the Core Strategy Inspector. Further, whilst it is noted that the Site Allocations DPD proposes to allocate more than the minimum requirement, the additional provision, only amounts to 996 dwellings (above the minimum requirement) which falls significantly short of meeting the OAN and making up for the Swindon allowance. If these OAN/Swindon allowance requirements are to be met, in accordance with the NPPF and Government imperative to boost the supply of housing, a further circa 2,500 homes should be identified/allocated across Wiltshire within the DPD. A positive approach must be taken, looking for opportunities to accommodate the homes needed.

In recognition of the need, the Wiltshire Core Strategy distributed the indicative minimum across each community area, with this only being an indicative minimum due to the lack of a comprehensive evidence base of available sites and their sustainability. Flexibility to deliver more in any one Community Area was fundamental to the soundness of the Core Strategy and to its consistency with the NPPF.

In this context, the council's insufficient response to the overall numbers through the Site Allocations DPD, as set out above, creates a fundamental lack of soundness within the plan. Further its approach, as put forward in Topic Paper 2, of only assessing opportunities to allocate housing in community areas where the indicative minimum housing requirement has not been met is fundamentally flawed. The approach responds only to appeal success (resulting from sites being released over the last two years through s78 appeals given the presiding shortfall in housing land supply over that period) and fails to provide a positive approach by failing to consider and allow opportunities for sustainable plan led development which could assist settlements in meeting their own housing (market and affordable) and economic / community needs and assist more widely in meeting the full OAN across Wiltshire, as required by national policy.

In addition, the objective for the plan to "demonstrate a rolling five year supply" and to "allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy" does not go far enough. An objective of the DPD should be to meet the OAN, and the DPD should be allocating sufficient sites to meet the OAN, not the minimum housing figure, in order to be consistent with National Policy.

In the preparation of the site allocations plan, the council should have firstly understood the capacity of all promoted sites in each community area (which should have formed the evidence base) to undertake a full sustainability appraisal to determine which are most sustainable to allocate in each housing market area in order to fully meet the OAN.

The approach that has been taken conflicts with one of the key outcomes set by the core strategy, with an outcome of Objective 3 being: 'providing everyone with access to a decent, affordable home'.

Paragraph 4.22 of the Core Strategy states that:

"The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Site Allocations DPD, and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan".

By restricting allocations only to those community areas and settlements that haven't met their indicative requirements, a rigid and negative approach is taken, frustrating sustainable development, contrary to the core strategy and contrary to national policy.

The plan is not sound in its current form as it is not positively prepared and inconsistent with national policy.

Justified

The NPPF requires the plan to be "the most appropriate strategy when assessed against the alternatives".

The plan process has not assessed reasonable alternatives. Sustainable sites across housing market areas have not been assessed as reasonable alternatives, as the area of search for sites has been artificially restricted. We consider that this is contrary to national policy.

It may at times be more sustainable to meet a housing requirement in a different settlement or community area, than where the need arises (which is the fundamental justification for the Wiltshire Core Strategy approach to the settlement hierarchy). The DPD evidence has not assessed whether this is the case, and therefore cannot be considered to be 'the most appropriate strategy' for Wiltshire, as required by paragraph 182 of the NPPF. The indicative requirements allowed for this flexibility, yet no flexibility and no resilience have been tolerated in the approach to the DPD. As a consequence, it is not justified.

Effective

To be effective the NPPF states that the plan should be deliverable over its period, including being based on effective joint working on cross-boundary strategic priorities. One concern is that Wiltshire Council has agreed to work with Swindon Borough Council on housing needs. A revised SHMA was available to the Council 12 months ago, yet the Council has failed to date to publish or take positive action to address the

output. We still expect the SHMA to be published imminently, but at this stage it is unclear as to how 'effective joint working' has been undertaken.

It is of concern that by only allocating development in community areas where the indicative Core Strategy (non OAN) housing requirement has not been met does not allow for a positive response to the findings of the new SHMA, including any re-drawing of housing market areas, does not respond to the considerable housing land supply shortfall in Swindon Borough, does not allow for the OAN to be met and does not allow flexibility and resilience should any of the sites relied upon not deliver as expected. If the Council become a 20% buffer authority the DPD position will become indefensible.

To be effective, the plan should take a more flexible approach, allowed for by the Core Strategy and expected by the Core Strategy Inspector when he found that plan sound, and allocate additional sites.

Consistent with national policy

As set out above, there are a number of elements of national policy that the draft DPD is not compliant with. In particular the requirement to significantly boost the supply of housing set out in paragraph 47 of the NPPF. This is a Government imperative, supported by the recent Ministerial Statement made alongside publication of the draft standard methodology to calculate OAN. Furthermore the requirement at NPPF paragraph 28 to support economic growth in rural areas. The DPD Fails to take a positive approach to sustainable new development, as one of the starting points to achieve sustainable development (the OAN) has been ignored and the full potential to identify sustainable new housing sites has not been assessed.

Summary

In conclusion, the Wiltshire Site Allocations Plan is required to meet four tests to be considered 'sound', as set out in paragraph 182 of the NPPF. It is considered that none of these have been met / demonstrated. The plan is not sound in its current form.

As established at the core strategy examination and supported by more recent evidence, the OAN for Wiltshire is 'around 44,000 dwellings. To be compliant with National Policy, Wiltshire Council should be positively seeking opportunities to allocate sufficient sustainable sites to meet the OAN. Yet, this is not part of the objective of the plan. The plan cannot be considered to be positively prepared or consistent with national policy. It is not sound.

The NPPF requires the plan to be "the most appropriate strategy when assessed against the reasonable alternatives". Allocating development in Community Areas or settlements which have already met their indicative minimums (particularly given the process from which those requirements have been met – which has released sites on their own merits rather than against reasonable alternatives) is clearly a 'reasonable alternative'. The council should have taken a more flexible approach, as allowed for by the Core Strategy and expected by the Core Strategy Inspector, to ensure the most appropriate strategy is proposed. Without having assessed this, the plan cannot be considered justified and is not sound.

There is concern over the effectiveness of the policy, as it is not clear how work with Swindon has been integrated into the proposed plan and how the plan has responded to the redefined Housing Market Areas and difficulty that Swindon has with meeting its own OAN and five-year housing land supply. The Plan, particularly at this stage in its preparation, must respond positively to the most up to date evidence base in order to be effective. This is a key requirement of the NPPF.

It is also of concern that there is no allowance for non-delivery or under delivery in community areas.

The NPPF requires that the plan should "enable the delivery of sustainable development in accordance with the policies in the framework". The plan does not enable the delivery of sustainable development, with opportunities for sustainable development precluded. It is not in accordance with the NPPF requirement to 'significantly boost the supply of housing'.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Gleeson Developments Ltd controls land in the Wiltshire area that is capable of making a sustainable contribution towards Wiltshire's future housing supply, it is therefore important we are able to participate orally to expand on the comments we have made within this representation.

Comment ID:	3151	Consultee Gleeson Developments Ltd	Agent Mr Martin Miller Technical Director	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 817896	Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		1.20			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	At paragraph 1.20, the draft WSAP purports to quote the four tests of soundness set out in paragraph 182 of the NPPF. However, the test for a plan being justified has not been identified correctly, inaccurately stating that a plan should be “an appropriate strategy”, whereas the correct test is that the plan should be “the most appropriate strategy”. The difference between “an appropriate strategy” and “the most appropriate strategy” is hugely significant and will fundamentally affect the soundness of a plan. Paragraph 1.20 must be reworded such that it correctly reflects the tests for soundness set out in paragraph 182 of the NPPF.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The difference between a plan having “an appropriate strategy” and “the most appropriate strategy” is potentially huge and fundamental to the question of whether a plan is sound. It is essential that this matter is drawn to the examining inspector’s attention, unless the plan is amended in advance.				

Comment ID:	3152	Consultee Gleeson Developments Ltd Person ID: 817896	Agent Mr Martin Miller Technical Director Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy		
Please identify the policy, paragraph, table, figure or site to which you are referring.	N & W HMA. Housing delivery strategy. Lyneham				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Land at Pound Farm, Lyneham</p> <p>The following response should be read in the context of the overarching response we have submitted on behalf of Gleeson Developments Limited to the DPD that deals with a number of principal concerns with the approach. [Officer note: The 'overarching response' is contained in the comment with ID 3150]</p> <p>The council's approach of only allocating housing in community areas and settlements where the indicative housing requirement has not been met is flawed, and does not allow sustainable plan led development which could otherwise assist settlements in meeting housing needs (market and affordable) housing and other needs of settlements.</p> <p>The WCS states as a key outcome of Objective 3: 'providing everyone with access to a decent, affordable home' and that paragraph 4.22 of the Core Strategy states that:</p> <p>"The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Site Allocations DPD, and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan".</p> <p>By restricting allocations only to those areas which haven't met their indicative requirements is taking a rigid approach preventing sustainable development proposals, and the plan cannot therefore be considered to be positively prepared.</p> <p>An indicative requirement of 1,455 dwellings in Royal Wootton Bassett, and 1,070 dwellings for the remainder of the community area provided in the Core Strategy. In the adoption of the Core Strategy the inspectors report in recommending adoption of the Core Strategy, commented upon the indicative housing requirements for the community area, and stated in paragraph 325:</p> <p>"Consequently, the level of indicative housing contained in Core Policy 19 is proposed to be 1,455 homes, of which some 1,070 would be at Royal Wootton Bassett and 385 in the remainder of the Community Area. Given the levels of need across the wider county, I consider that these are relatively low figures".</p> <p>Further the Inspector's report goes on to state in paragraph 326 in dismissing the view that WC should be making a strategic allocation in the community area stated:</p> <p>"the Council's strategy towards this community area is cogent, consistent with the objectives of the CS as a whole, is supported by evidence and the housing volumes are expressed Indicatively thus not precluding additional provision".</p> <p>The approach taken by the council of ruling out development because the indicative housing requirement has been met is thus contrary to the approach intended at the adoption of the Core Strategy, and the approach advocated in the Inspector report. In paragraph 327 the Inspector in fact considered that:</p> <p>"The Sites DPD will provide an opportune moment, working alongside any neighbourhood planning processes, to review the need for additional housing land in Royal Wootton Bassett and the Community Area as a whole".</p>				

	<p>In this Site Allocations DPD WC should be taking this ‘opportune moment’ to review the need for additional housing land in the community area. The approach WC are taking is in direct conflict of that envisaged when the Core Strategy was recommended for adoption, and in direct conflict with the government’s objective to ‘significantly boost the supply of housing’.</p> <p>It also conflicts with the evidence base, which informed the core strategy. Appendix 4 of Topic paper 15 states in relation to the community area that</p> <p>“The need to ensure flexibility to enable local communities to deliver growth in response to local needs and aspirations should be part of the long-term strategy for the Community Area. It is not considered necessary to revise the scales of growth proposed in Wiltshire (of 1,250 homes). In rural areas the appropriate scale of growth should be determined locally through engagement with localities in the preparation of a site allocation Development Plan Document and/or through local Neighbourhood Plans”.</p> <p>This is clearly not happening and therefore the plan is unsound in this regard, and not positively prepared.</p> <p>In Lyneham, the primary school has surplus capacity, there is an urgent need for affordable dwellings, and there is a deficit in open space for the village. The recent appeal decision in relation to Pound Farm accepted that development of the promoted site would deliver substantial benefits including a better landscaped edge to the village, affordable homes and the impact of the proposed development on the listed rectory in close proximity to the site would be outweighed by the public benefits of the proposal. The site benefits from a frequent bus service in close proximity, providing three buses an hour to Chippenham and Swindon. There are a range of employment opportunities in the village, and services and facilities.</p> <p>Residential development will assist in sustaining the facilities in the village, whilst the future of the MOD site is considered.</p> <p>In other large villages, including Bratton, the draft DPD is proposing to allocate sites which will then exceed the community area indicative minimums with justification that there is a local need. There is a clear local need in Lyneham, both due to the affordable housing need, and the need to support local services including the presence of a primary school with surplus capacity.</p> <p>This site should have been considered for allocation, and is a suitable, available and deliverable. Whilst Gleeson has a land interest as shown in the attached plan, it is considered that part of the site can accommodate up to 50 dwellings, and be in accordance with the Wiltshire spatial strategy.</p> <p>The draft DPD is unsound, and needs to go beyond solely allocating sites to enable community areas to meet their indicative requirements, but to proactively embrace opportunities for sustainable development across Wiltshire.</p>
<p>Attached files (Please see Objective)</p>	<p>4747322</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Gleeson Developments Ltd controls land in the Wiltshire area that is capable of making a sustainable contribution towards Wiltshire’s future housing supply, it is therefore important we are able to participate orally to expand on the comments we have made within this representation.</p>

Comment ID:	3153	Consultee Gleeson Developments Ltd	Agent Mr Martin Miller Technical Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 817896	Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	East HMA. Housing delivery strategy. Pewsey	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pewsey Old Hospital Phase III</p> <p>The following response should be read in the context of the overarching response we have submitted on behalf of Gleeson Developments Limited to the DPD that deals with a number of principal concerns with the approach. [Officer note: The 'overarching response' is contained in the comment with ID 3150]</p> <p>Gleeson Development's Limited owns the freehold of land at the former Pewsey Hospital, part of which has been developed for residential uses. The site, which would provide an extension of the existing housing development, provides a suitable and sustainable location for additional housing. If allocated, it would be deliverable with reference to NPPF footnote 11.</p> <p>The Made Neighbourhood Plan for Pewsey (June 2015) states in Policy 1 that development outside the limits of development may be brought forward through a sites allocations development plan document, reflecting the examining report when considering the limits of development and potential that these might change through the District Council's review of settlement boundaries and allocation of non-strategic housing sites in the Site Allocations DPD, that:</p> <p>"Furthermore, the second criterion of the policy recognizes that in certain circumstances, described in the policy as "exceptional", there are occasions when development outside the LoD [limits of development] may be acceptable. This will be brought forward through a site allocation DPD, a community planning document or as an exceptions site. Therefore whilst the policy steers development it also has sufficient inbuilt flexibility as it does not preclude development outside the LoD and therefore helps to plan positively for the area." (Independent Examiners Report paragraph 75, dated 17 April 2015)</p> <p>There is no reason as to why a sustainable site should not be allocated at Pewsey in the Site Allocations DPD.</p> <p>Whilst the outstanding indicative housing requirement for the Community Area has been met, Pewsey is a local service centre, which is intended in the Wiltshire Core Strategy Policy CP1 to "provide for modest levels of development in order to safeguard their role and to deliver affordable housing". These figures are also minimums.</p> <p>The fact that there is a made neighbourhood plan, or the fact that the latest monitoring data indicates that the indicative requirement has been met, should not form the basis for precluding the allocation of housing sites at Pewsey. Such sites could contribute to sustainable development through the plan led process.</p> <p>The neighbourhood plan currently allocates two sites, 'Malborough Road' and 'Old Hospital Phase III site' for 49 and 9 dwellings respectively. There remains doubt that the Marlborough Road site is in fact deliverable as it is not being progressed in terms of a planning application despite the allocation having been confirmed two years ago. In any event, this scale of allocation (58 dwellings) is very low for a Local Service Centre, noting that a number of large villages, which are a step down in the settlement hierarchy, are allocated to receive an additional 50 dwellings each.</p>				

	<p>The promoted site in Pewsey benefits from many sustainability credentials, including the location in proximity to Pewsey Train Station (10 minute walk, under 0.5 mile), and the village centre (12 minute walk, 0.6 mile), less than half a mile from Pewsey Vale School, Pewsey Primary School and 0.2 miles from Pewsey Swimming and Sports Centre.</p> <p>Previous work has demonstrated that the development of the site would have no negative impact of the AONB. This was confirmed by the publication of the 'Landscape Sensitivity of Sites within the North Wessex Downs AONB' undertaken by Land Management Services Limited in 2012. At that time, this (together with a much smaller site on the north-eastern edge of the settlement) was the only site put forward in the SHLAA, located outside the settlement boundary at Pewsey, considered to have potential for some development. Nothing has changed in this respect since that time.</p> <p>The capacity of the site is in the region of 40 dwellings, which would also respond positively to site context and the settlement boundary/character, enable the provision of green space and footpath links through the site, as well as the retention of important trees, and retain a significant buffer to the adjacent health care use.</p> <p>The flawed methodology adopted by the council, has resulted in sustainable sites such as this site being discounted, and not assessed as reasonable alternatives. Therefore the plan cannot be considered sound.</p> <p>To be sound, the evidence base needs to assess all sites available and promoted for development, within each housing market area and assess those through the Sustainability Appraisal. At the Core Strategy stage, there was not enough detailed evidence base to understand the capacity of each settlement, it is for the Site Allocations plan to do this.</p> <p>The site at Pewsey is available, and can assist Wiltshire Council in 'significantly boosting the supply of housing' in accordance with the NPPF.</p>
<p>Attached files (Please see Objective)</p>	<p>4747321</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Gleeson Developments Ltd controls land in the Wiltshire area that is capable of making a sustainable contribution towards Wiltshire's future housing supply, it is therefore important we are able to participate orally to expand on the comments we have made within this representation.</p>

Comment ID:	3154	Consultee Gleeson Developments Ltd Person ID: 817896	Agent Mr Martin Miller Technical Director Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	N & W HMA. Housing delivery strategy. Malmesbury.			Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Malmesbury The following response should be read in the context of the overarching response we have submitted on behalf of Gleeson Developments Limited to the DPD that deals with a number of principal concerns with the approach. [Officer note: The 'overarching response' is contained in the comment with ID 3150] Malmesbury is a sustainable market town, identified in the Core Strategy as a second order settlement. It contains a local primary and secondary school, has a significant employment base, as well as a range of community, leisure and retail facilities. As a consequence of the range of employment opportunities in the town, coupled with too few homes and affordability issues, there is an established pattern of in-commuting for work, particular as for the town's major employer, Dyson, the majority of the workforce live outside the Malmesbury Community Area. The level of in-commuting for work will undoubtedly increase as Dyson expands and because the level of housing growth planned for the town does not match the job growth that is happening. As such, Malmesbury should delivery additional housing growth beyond those already planned. Whilst we acknowledge the Malmesbury Neighbourhood Plan has allocated sufficient sites to meet indicative housing requirement set out in the Core Strategy this indicative requirement should not be seen as a minimum or a ceiling to development. This is particularly the case as whilst the Backbridge site has a live planning application, to date it has failed to delivery a key link to the town centre that is a requirement of the neighbourhood plan in order to make the site sustainable. The Core Strategy Inspector was clear that the total housing requirement of 42,000 should be seen as a minimum as the objectively assessed housing need at the time was in fact 44,000. As a sustainable location, Malmesbury should be delivering more development, over and above the indicative requirement to help meet this need and reduce the level of in-commuting to the town. The evidence base is flawed as it fails to consider all locations by excluding areas where there is an adopted Neighbourhood Plan, such as Malmesbury. As a market town, Malmesbury is the most sustainable location and should be considered for additional growth. The adopted Neighbourhood Plan does not mean Malmesbury should not be considered in terms of its ability to accommodate more growth. By means of examples, the Farnham Neighbourhood Plan was made on the 28 July 2017. Following its adoption modifications to the Waverley Local Plan Part 1 have been considered by the Council, increasing Farnham's overall housing requirement, with additional sites to be allocated over and above those allocated in the made Neighbourhood Plan. Waverley Borough Council has sought legal advice on this approach which has confirmed it is appropriate and that full weight can still be attributed to the Neighbourhood Plan in these circumstances. The Sustainability Appraisal has only assessed sites in the reminder of the Malmesbury Community Area, the assessment process should have also considered sites within the Malmesbury Neighbourhood Plan area, their sustainability credentials and the benefits they may deliver. Gleeson has a long-term option in respect of land to the northern edge of Malmesbury, known as Whychurch Farm to the south of Filands, see attached site location plan.		Effective		
			Consistent with national policy		

	<p>The site is a sustainable site that is abutting the settlement boundary of the town. It is suitable, sustainable and deliverable and could deliver circa 300 dwellings, additional employment space, and a considerable amount of public open space.</p> <p>There is also land that has outline planning permission in place to deliver a primary school if required. The suitability and sustainability of this area of the town was accepted when planning permission was granted at appeal for the land to the south of Filands, now known as Filands View.</p> <p>There are no major constraints to development on the site. The land is on the other side of the town to the Cotswold AONB and is located away from environmental and flood risk constraints to the south of the town. Development can be developed to retain views of the Abbey. This area is well located in terms of its proximity to existing employment opportunities, such as Dyson Campus and is well related to the built form of Malmesbury.</p> <p>Development in this location can integrate well into the landscape and provide a natural edge to the town. It would benefit from the retention of mature trees and hedgerows. There are no technical constraints to development.</p> <p>There is a wide variety of community facilities within reasonable walking and cycling distance:</p> <p>Dyson, a key local employment that is delivering a major programme of expansion expected to provide up to an additional 3,000 jobs in the town.</p> <p>Gloucester Road and Park Road Industrial Estate Malmesbury town centre Malmesbury Church of England Primary School Malmesbury Secondary School Waitrose</p> <p>The site is also accessible to a range of bus services providing links into the town centre, to Cirencester and Swindon.</p> <p>The site is deliverable, available and offers a suitable location to deliver new housing with a realistic prospect that housing will be delivered on site within the plan period.</p>
Attached files (Please see Objective)	4747317
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Gleeson Developments Ltd controls land in the Wiltshire area that is capable of making a sustainable contribution towards Wiltshire's future housing supply, it is therefore important we are able to participate orally to expand on the comments we have made within this representation.

Comment ID:	3155	Consultee Mr Alastair Page	Agent Mr Chris Dance Associate	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1138113	LPC (Trull) Ltd Person ID: 899110	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	A.48 Trowbridge SBR	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It is a complete anomaly that the land at The Grange is not included within the settlement boundary for Hilperton, essentially being surrounded on all sides by built form.</p> <p>By altering the settlement boundary for Hilperton to include both the land at the Grange, and the land immediately to the east with planning permission for 15 dwellings, this will ensure that the principle of development on the land is acceptable (and thereafter a suitably designed scheme can be developed that fully respects the character of the Conservation Area).</p> <p>Enclosed with this submission is a document titled, "Proposed Settlement Boundary Alteration". Plan 2 shows change to the settlement boundary that is requested at Hilperton. It is incumbent upon the Housing Site Allocations Plan, to make it sound, that new development is facilitated in sustainable locations to help bring forward the housing requirement as set out in Core Policy 2.</p> <p>The alteration of the settlement boundary for Hilperton to include both the land at the Grange, and the land immediately to the east with planning permission for 15 dwellings, will ensure that the principle of residential development on the land is acceptable (and thereafter a suitably designed scheme can be developed that fully respects the character of the Conservation Area).</p>				
Attached files (Please see Objective)	4747381 / 4747382 / 4747383 / 4747380				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To articulate to the Inspector why it is appropriate to allocate the land at The Grange, Devizes Road, Hilperton within the Settlement Boundary for Hilperton.				

Comment ID:	3156	Consultee Gleeson Developments Ltd Person ID: 817896	Agent Mr Martin Miller Technical Director Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy	No	
Please identify the policy, paragraph, table, figure or site to which you are referring.	N & W HMA. Housing delivery strategy. Westbury				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Land at Westbury Leigh The following response should be read in the context of the overarching response we have submitted on behalf of Gleeson Developments Limited to the DPD that deals with a number of principal concerns with the approach. [Officer note: The 'overarching response' is contained in the comment with ID 3150] Gleeson Developments Limited has an option at Westbury Leigh, which provides a suitable and sustainable site for housing development. If allocated, it would be deliverable with reference to NPPF footnote 11. The council's approach of only allocating housing in community areas / settlements where the indicative housing requirement has not been met is fundamentally flawed. It responds only to the release of sites through the s78 appeal process over the last few years and fails to respond positively to the opportunity for sustainable plan led development, which could assist settlements in meeting housing needs (market and affordable) and other economic and community needs of the settlement. The WCS states as a key outcome of Objective 3: 'providing everyone with access to a decent, affordable home' and that paragraph 4.22 of the Core Strategy states that: "The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Site Allocations DPD, and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan". By restricting allocations only to those areas that have not met their indicative requirement is taking a too rigid approach, preventing sustainable development, the plan cannot be considered to be positively prepared. Westbury is designated as a market town in the Wiltshire Core Strategy, with respect to which Policy CP1 identifies as having "potential for significant development that will increase jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities". Whilst the indicative minimum has been met for Westbury town itself, in light of the need to significantly boost the supply of housing, and that the OAN for Wiltshire needs to be met, all available suitable sites at sustainable settlements should be considered. This would represent positive planning aimed at meeting the requirements of NPPF paragraph 47. The promoted site is sustainably located, within 800m of Dilton Marsh Railway station (with the entire site within 1.3km of the Railway station). The town centre is also within 1.3km, with access to services, shops and facilities all within easy walking and cycling distance. The site area is 8.2 hectares, and therefore this site could accommodate a range of uses including residential development. It should also be noted that the Westbury CA Remainder figure has not been met with a shortfall of 7 dwellings. The council is therefore allocating 40 dwellings to Bratton, a large village, to meet this shortfall. This would exceed the indicative requirement. It is not clear, and				

	<p>therefore unjustified, as to why exceeding the indicative requirement in Bratton but not in Westbury has been precluded from the start of the process and not therefore assessed as a reasonable alternative. The plan is not sound in this regard.</p> <p>To be considered sound the evidence base needs to robustly assess the various opportunities for sustainable development in Wiltshire, including in those areas that have already met the indicative requirements.</p>
Attached files (Please see Objective)	4747315
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>Gleeson Developments Ltd controls land in the Wiltshire area that is capable of making a sustainable contribution towards Wiltshire's future housing supply, it is therefore important we are able to participate orally to expand on the comments we have made within this representation.</p>

Comment ID:	3157	Consultee Gleeson Developments Ltd	Agent Mr Martin Miller Technical Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 817896	Terence O'Rourke Person ID: 817881	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		1.5		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Site Allocations Plan excludes the area covered by the Chippenham Site Allocations Plan, which was adopted in May 2017 and only includes “strategic allocations”. The exclusion of the CSAP area from the Wiltshire Site Allocations Plan means that:</p> <p>The WSAP has not considered the potential for non-strategic allocations at Chippenham to contribute to the county’s future housing requirements, and the sustainability merits of non-strategic developments at one of the county’s three principal settlements has not been assessed against the sustainability merits of delivering housing at lower order settlements.</p> <p>In the absence of any assessment of the potential for non-strategic developments at Chippenham to form part of the county’s future development strategy, it cannot be concluded that “the most appropriate” development strategy is being pursued. Consequently, the plan is unsound because the “justified” test is not satisfied.</p> <p>For the plan to be justified, the Wiltshire Site Allocations Plan must consider the development potential of non-strategic sites in and around Chippenham to contribute towards the county’s future development requirements, in the same way that policy H2 considers the potential for nonstrategic sites around Trowbridge.</p>				
Attached files (Please see Objective)	4747312				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Gleeson Developments Ltd controls land in the Chippenham area that is capable of making a sustainable contribution towards Wiltshire’s future housing supply (see attached map). However, as a non-strategic site that it is not allocated in the Chippenham Site Allocations Plan, in the absence of a neighbourhood plan for Chippenham, the preparation of the draft Wiltshire Site Allocations Plan represents the only development plan that can consider the development potential of non-strategic sites. The council's decision to exclude the development potential of non-strategic sites around Chippenham yet to consider the potential for non-strategic sites around Trowbridge needs to be discussed before the examination inspector.				

Comment ID:	3158	Consultee Person ID: 1138132	Agent Tom Wright Planner Origin3 Person ID: 1126888	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:			
Please identify the policy, paragraph, table, figure or site to which you are referring.	Housing Land Supply				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This letter is submitted by Origin3 on behalf of McLaren (Swindon) Limited and Primegate Properties (Hooksouth) Ltd with regards to the pre-submission version of the Wiltshire Housing Site Allocations Plan (SAP) and the wider Wiltshire planning strategy as a whole. Whilst we understand the Council's focus for this consultation period is on specific policies within the draft SAP, we consider there to be a wider issue in hand with the Council's planning strategy moving forwards that needs to be addressed relating to soundness and consistency with the NPPF (paragraph 182).</p> <p>Given the circumstances set out below, we consider that the only way the Council can deliver a sound development plan is through undertaking a more holistic review of the housing requirement and growth strategy now. Unless addressed now, the Council's planning strategy leaves the following deficiencies:</p> <p>The Council is unable to demonstrate a deliverable supply of sites for years 6-10, required by the NPPF (paragraph 47), as the Core Strategy (CS) (adopted in January 2015) did not provide for the preferable 15 year horizon advised by the NPPF (paragraph 157). There has been no "Early CS Review" as committed during the CS Examination. As such, by the time the SAP is adopted in Q4 2018 (at the earliest), there will be less than 8 years of the plan period remaining (up until 2026).</p> <p>The Council's evidence base suggests that Wiltshire will not be able to demonstrate a five year housing land supply in each of the three Housing Market Areas (HMAs) for year 8 (2025/26) (at best) meaning a more holistic planning review assessing the housing requirement would be appropriate now (see table 3.4 below).</p> <p>At a minimum, the Council should be allocating significantly more dwellings to ensure that there is a sufficient, robust rolling five year supply until the end of the plan period.</p> <p>Topic Paper 3 (Housing Land Supply), published in June 2017 as part of the Council's evidence base to support the SAP, suggests that when applying the most up to date completions data, the current planning strategy leaves the Council without a demonstrable five year supply in each of the three HMAs. Particularly in the South HMA where there is only a marginal five year supply. This does not account for any under or non-delivery.</p> <p>[Refer to table in attached full representation document]</p> <p>This is more concerning in light of recent Government announcements (DCLG Planning for the right homes in the right places: consultation proposals, 12 September 2017) suggesting that the Objectively Assessed Need (OAN) for Wiltshire will be uplifted significantly (1,270 dwellings more than the CS and SAP accounts for over the period 2016-2026) and applied to plans that have not been submitted for Examination by the 31st March 2018.</p> <p>At present, the Council anticipates the SAP being submitted for Examination beyond this date. In our view this suggests the Council should be addressing this additional need as part of this process here and now.</p>				

	<p>This can only be done properly through a more substantial Local Plan Review. We understand from the Council's draft Local Development Scheme (LDS) currently under review that the strategy is to progress with a Joint Spatial Framework in partnership with Swindon Borough Council over the timeframe Q3 2017 – Q3 2019 and a subsequent Wiltshire Local Plan Review over the period Q3 2019 – Q1 2021.</p> <p>We support this process in principle to take account of additional housing need and to assist Swindon in delivering its housing requirement (acknowledging Swindon's current housing supply of less than 2.5 years). This would also be aligned with recent Government guidance to improve cross boundary matters, looking at housing need within cross boundary areas and planning to meet neighbouring shortfalls.</p> <p>However in light of the above and with regard to the points set out page 1 of this letter, we consider the Council should be progressing with this wider Local Plan review now rather than seeking a temporary fix through the SAP which cannot provide a sufficient planning strategy for the required 6-10 year period.</p>
Attached files (Please see Objective)	4747225
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3159	Consultee Mr and Mrs Adrian and Jannette Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138190	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Wiltshire Council Community Governance Review July 2016</p> <p>A great deal of work and public expense was involved in preparing reports for the CGR consultation that took place last year. At a meeting of full council it was decided that this area of North Bradley should not be adopted by Trowbridge Town Council.</p> <p>However, in the Wiltshire Housing Site Allocations Plan it is stated in paragraph 3.3 'That no settlements in the Trowbridge Area are considered to have had their settlement boundaries reviewed through a sufficiently advanced neighbourhood planning process.'</p> <p>Are we to understand that the costly Boundary Review of 2016 was done in a less than professional manner and therefore ultimately pointless? Or is this a way of forcing a second review in order to overturn some of the earlier conclusions which do not suit Wiltshire Council and their desire to site the majority of houses in and around Trowbridge?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3160	Consultee Mr and Mrs Adrian and Jannette Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138190	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Environment This corner of North Bradley not only supports Bechstein Bats, but offers sufficient bio diversity to support Great Crested Newts, Toads, Frogs, Grass Snakes, Adders, Owls and various other birds of prey and wild deer This lane serves as public amenity used by local people walking dogs or simply enjoying a family walk in what is a rural oasis in an already built up surrounding area. Cyclists, joggers, horse riders, take advantage of the lack of cars and people also gather blackberries, sloes, rosehips, elderflowers and elderberries in the old hedgerows. The people living in the planned Ashton Park will doubtless also be making use of this facility whilst strolling through to the Spitfire Retail Park, as the workers from the White Horse Business Park already currently do. Any road widening at either end of Drynham Lane will totally spoil the nature of this much appreciated local resource. (We actually produced a petition when objecting to the boundary review - which was just a snapshot of how people use and enjoy this lane.)</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3161	Consultee Mr and Mrs Adrian and Jannette Robinson	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138190		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This area is not prone to dramatic flooding, although the fields do have a tendency to 'pool' as pointed out by a representative of Wessex Water and the lane does flood after heavy rain. It does seem that the local area copes well enough with adverse weather but any large development is likely to introduce greater strain on this natural capability.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3162	Consultee Mr and Mrs Adrian and Jannette Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138190	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>History As already mentioned in the draft plan this lane contains the original farmhouse, now a Grade II listed building, all of the cottages nearby are former farmworkers cottages and a cow/pig shed - it seems a shame to put these at risk when Trowbridge, for a county town, is woefully short of well maintained historical sites and character.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3163	Consultee Mr and Mrs Adrian and Jannette Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138190	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Infrastructure</p> <p>Why is there such a rush forward to build over precious green land without the numerous brownfield sites contained within the centre of Trowbridge being addressed first?</p> <p>Why would you consider building all these houses when the primary schools are already over-subscribed and secondary schools at full capacity within a few years (based on your own research)?</p> <p>Why would you consider building all these homes when there is insufficient capacity within dentist and doctor's surgeries in the local areas? A fact of enormous public concern with national and local resources already stretched to the limit.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3164	Consultee Mr and Mrs Adrian and Jannette Robinson Person ID: 1138190	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Traffic</p> <p>Despite the draft plan stating that Trowbridge is within walking and cycling distance (we haven't noticed any properly 'joined up' cycle lanes within this busy county town of Wiltshire) it must be appreciated in this modern age that the majority of houses will use upwards of two cars for 'school runs' and transportation to a place of work. In addition to the people living on the estate, the traffic to and from the proposed school will just exacerbate this problem.</p> <p>Any road that joins up to the roundabout near KFC will only exacerbate the gridlock that frequently occurs with the link in roads. Extra traffic along Wiltshire Drive will have a similar effect further along Bradley Road.</p> <p>However, the worst aspect of having such an increased number of cars along the very limited capacity within Drynham Road and Dursley Road will create problems because the road, at the quietest times, is like a slalom run where you have to weave in and out of parked cars which frequently causes frustration with motorists.</p> <p>It would be interesting to see how you would solve the problem at the end of Dursley Road where, with the exception of taxis and buses, you are not allowed to turn right onto County Road. Cars are often tempted to illegally turn right across two lanes of traffic or, as we do, drive to the top and then do a very risky u-turn on the roundabout at the top. I frequently have to stop on the roundabout because other vehicles have misinterpreted my indications and assumed I was just turning right - increased traffic doing this can only increase the likelihood of an accident.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3165	Consultee Mr and Mrs Adrian and Jannette Robinson	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138190	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge Brownfield			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Assumptions Your draft plan believes that green spaces could be protected and enhanced albeit you are taking a lot and giving little in return yet not looking at your brown sites. You believe that it would create employment in the local building trade - we suggest it might mean more cars driving to and from the area and any construction would be temporary anyway once the houses were built. These proposals believe that local shops would benefit from more houses whereas we truly think that the local shops won't necessarily gain from more houses in and around Trowbridge, maybe with the exception of the revitalised Odeon area, because in our experience local people prefer to visit 'nicer' towns with better facilities. In our opinion despite Trowbridge being the county town of Wiltshire it is very sadly lacking - you should be looking to building it up inside out and not making it into a big conurbation with no character or heart.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3166	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>H3.1 Land at Netherhampton Road, Salisbury</p> <p>We write to object to the designation of land south of the Netherhampton Road Salisbury for approximately 640 dwellings. The numbers of dwellings proposed is far too high and the development will join Salisbury to Netherhampton in an ugly amorphous sprawl.. The proposed development goes too far south, well beyond the southern edge of the city, and building on good arable land.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3167	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>3. There is totally inadequate road provision through Harnham and beyond for the traffic which will be generated by such a large development. There is little employment in Salisbury, except at the hospital and in retailing and domestic work. People will work elsewhere, for example in Southampton, Amesbury and Andover. Cycle paths and foot paths will not be used by workers except for recreation. The chaos at rush hours created by the repair works on New Bridge road reducing the principal bridge over the river Avon to two single carriageways, reflects the inadequacy of north south links to and from Salisbury.</p> <p>4. The Country Park will not replace real countryside with footpaths existing at present or adequately compensate for more people using the open spaces along the Harnham Hill.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3168	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is little employment in Salisbury, except at the hospital and in retailing and domestic work. People will work elsewhere, for example in Southampton, Amesbury and Andover.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3169	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5. The proposed site sprawls up the south side of the valley west of Salisbury which is visually very attractive with historical planting carried out by the Wilton Estate and vistas of the cathedral spire across the meadows. Building a large development here will destroy this historic landscape.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3170	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	6. In view of the above points the proposal does not follow the "Core Planning Principles" (Para.17) of the "National Planning Policy Framework".				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3171	Consultee Oliver Taylor Gleeson Strategic Land Ltd Person ID: 449270	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Land Supply		Justified
				Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>This representation deals with a number of concerns principally: The DPD has not been brought forward in the way envisaged when the Core Strategy inspector found the Core Strategy to be sound, particularly with respect to meeting the objective assessment of housing need (OAN). This is inconsistent with the NPPF. Also, that the plan will not be resilient and will be ineffective in meeting housing need, including addressing affordability issues. Overall the plan cannot be considered sound as it is not positively prepared, justified or consistent with national policy.</p> <p>Positively prepared Paragraph 47 of the Framework states that a Local Plan should meet the full objectively assessed needs for market and affordable housing in the relevant HMA as far as is consistent with the other policies of the Framework. There has been no attempt in the draft plan to meet the objectively assessed need (OAN) as set out below. The Wiltshire Core Strategy Inspectors report at paragraph 78 identified the OAN as around 44,000 and later in paragraph 80 stated "... the sites DPD, the Chippenham Site Allocation DPD and the neighbourhood planning processes will enable the Council to proactively seek to meet, and if necessary reassess, its objectively assessed housing need and plan for its provision accordingly". The inspectors report goes on to state "Indeed, I am particularly mindful that the Council intends to produce a new SHMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes. Consequently I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more". As stated this was the 'minimum housing figure' and is not the OAN. The Inspector was expecting a revised SHMA with a new OAN in early 2016 and clearly set an expectation that Wiltshire Council should be planning, through subsequent DPDs, to meet this OAN as well as the 'Swindon allowance' (900 homes) because the latter does not meet the housing needs Wiltshire. No updated SHMA with revised OAN has been published to date. Nevertheless, the most recent evidence, as reported to the Swindon Wiltshire Local Enterprise Partnership on 14 February 2017 and correlating with the Government's recently published OAN figures using a standard methodology (currently subject to consultation), is that the OAN remains at or above 44,000 homes across a 20 year period. It is surprising that the consultation document makes no mention of these requirements, set by the Core Strategy Inspector. Further, whilst it is noted that the Site Allocations DPD proposes to allocate more than the minimum requirement, the additional provision, only amounts to 996 dwellings (above the minimum requirement) which falls significantly short of meeting the OAN and making up for the Swindon allowance. If these OAN/Swindon allowance requirements are to be met, in accordance with the NPPF and Government imperative to boost the supply of housing, a further circa 2,500 homes should be identified/allocated across Wiltshire within the DPD. A positive approach must be taken, looking for opportunities to accommodate the homes needed.</p>			

In recognition of the need, the Wiltshire Core Strategy distributed the indicative minimum across each community area, with this only being an indicative minimum due to the lack of a comprehensive evidence base of available sites and their sustainability. Flexibility to deliver more in any one Community Area was fundamental to the soundness of the Core Strategy and to its consistency with the NPPF.

In this context, the council's insufficient response to the overall numbers through the Site Allocations DPD, as set out above, creates a fundamental lack of soundness within the plan.

Further its approach, as put forward in Topic Paper 2, of only assessing opportunities to allocate housing in community areas where the indicative minimum housing requirement has not been met is fundamentally flawed. The approach responds only to appeal success (resulting from sites being released over the last two years through s78 appeals given the presiding shortfall in housing land supply over that period) and fails to provide a positive approach by failing to consider and allow opportunities for sustainable plan led development which could assist settlements in meeting their own housing (market and affordable) and economic / community needs and assist more widely in meeting the full OAN across Wiltshire, as required by national policy.

In addition, the objective for the plan to "demonstrate a rolling five year supply" and to "allocate sites at the settlements in the County that support the spatial strategy of the Wiltshire Core Strategy" does not go far enough. An objective of the DPD should be to meet the OAN, and the DPD should be allocating sufficient sites to meet the OAN, not the minimum housing figure, in order to be consistent with National Policy.

In the preparation of the site allocations plan, the council should have firstly understood the capacity of all promoted sites in each community area (which should have formed the evidence base) to undertake a full sustainability appraisal to determine which are most sustainable to allocate in each housing market area in order to fully meet the OAN.

Effective

To be effective the NPPF states that the plan should be deliverable over its period, including being based on effective joint working on cross-boundary strategic priorities. One concern is that Wiltshire Council has agreed to work with Swindon Borough Council on housing needs. A revised SHMA was available to the Council 12 months ago, yet the Council has failed to date to publish or take positive action to address the output. We still expect the SHMA to be published imminently, but at this stage it is unclear as to how 'effective joint working' has been undertaken.

It is of concern that by only allocating development in community areas where the indicative Core Strategy (non OAN) housing requirement has not been met does not allow for a positive response to the findings of the new SHMA, including any re-drawing of housing market areas, does not respond to the considerable housing land supply shortfall in Swindon Borough, does not allow for the OAN to be met and does not allow flexibility and resilience should any of the sites relied upon not deliver as expected. If the Council become a 20% buffer authority the DPD position will become indefensible.

To be effective, the plan should take a more flexible approach, allowed for by the Core Strategy and expected by the Core Strategy Inspector when he found that plan sound, and allocate additional sites.

Consistent with national policy

As set out above, there are a number of elements of national policy that the draft DPD is not compliant with. In particular the requirement to significantly boost the supply of housing set out in paragraph 47 of the NPPF. This is a Government imperative, supported by the recent Ministerial Statement made alongside publication of the draft standard methodology to calculate OAN. Furthermore the requirement at NPPF paragraph 28 to support economic growth in rural areas. The DPD Fails to take a positive approach to sustainable new development, as one of the starting points to achieve sustainable development (the OAN) has been ignored and the full potential to identify sustainable new housing sites has not been assessed.

Summary

In conclusion, the Wiltshire Site Allocations Plan is required to meet four tests to be considered 'sound', as set out in paragraph 182 of the NPPF. It is considered that none of these have been met / demonstrated. The plan is not sound in its current form.

As established at the core strategy examination and supported by more recent evidence, the OAN for Wiltshire is 'around 44,000 dwellings. To be compliant with National Policy, Wiltshire Council should be positively seeking opportunities to allocate sufficient sustainable sites to meet the OAN. Yet, this is not part of the objective of the plan. The plan cannot be considered to be positively prepared or consistent with national policy. It is not sound.

	<p>There is concern over the effectiveness of the policy, as it is not clear how work with Swindon has been integrated into the proposed plan and how the plan has responded to the redefined Housing Market Areas and difficulty that Swindon has with meeting its own OAN and five-year housing land supply. The Plan, particularly at this stage in its preparation, must respond positively to the most up to date evidence base in order to be effective. This is a key requirement of the NPPF.</p> <p>It is also of concern that there is no allowance for non-delivery or under delivery in community areas.</p> <p>The NPPF requires that the plan should “enable the delivery of sustainable development in accordance with the policies in the framework”. The plan does not enable the delivery of sustainable development, with opportunities for sustainable development precluded. It is not in accordance with the NPPF requirement to ‘significantly boost the supply of housing’.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Gleeson control land that is capable of making a sustainable contribution towards Wiltshire's future housing supply. it is therefore important we are able to participate orally to expand on the comments made.</p>

Comment ID:	3172	Consultee Oliver Taylor Gleeson Strategic Land Ltd	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 449270	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		SA		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The evidence base is insufficient, in particular the sustainability appraisal and the topic papers have not been positively prepared because the Council started from a point of not assessing all of the opportunities for sustainable development across Wiltshire as part of the process. The output is that reasonable alternatives have not been considered.</p> <p>Justified</p> <p>The NPPF requires the plan to be “the most appropriate strategy when assessed against the alternatives”.</p> <p>The plan process has not assessed reasonable alternatives. Sustainable sites across housing market areas have not been assessed as reasonable alternatives, as the area of search for sites has been artificially restricted. We consider that this is contrary to national policy. It may at times be more sustainable to meet a housing requirement in a different settlement or community area, than where the need arises (which is the fundamental justification for the Wiltshire Core Strategy approach to the settlement hierarchy). The DPD evidence has not assessed whether this is the case, and therefore cannot be considered to be ‘the most appropriate strategy’ for Wiltshire, as required by paragraph 182 of the NPPF. The indicative requirements allowed for this flexibility, yet no flexibility and no resilience have been tolerated in the approach to the DPD. As a consequence, it is not justified.</p> <p>The NPPF requires the plan to be “the most appropriate strategy when assessed against the reasonable alternatives”. Allocating development in Community Areas or settlements which have already met their indicative minimums (particularly given the process from which those requirements have been met – which has released sites on their own merits rather than against reasonable alternatives) is clearly a ‘reasonable alternative’. The council should have taken a more flexible approach, as allowed for by the Core Strategy and expected by the Core Strategy Inspector, to ensure the most appropriate strategy is proposed. Without having assessed this, the plan cannot be considered justified and is not sound.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		Gleeson control land that is capable of making a sustainable contribution towards Wiltshire's future housing supply. it is therefore important we are able to participate orally to expand on the comments made.			

Comment ID:	3173	Consultee Oliver Taylor Gleeson Strategic Land Ltd	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 449270		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		The whole document		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The approach that has been taken conflicts with one of the key outcomes set by the core strategy, with an outcome of Objective 3 being: 'providing everyone with access to a decent, affordable home'. Paragraph 4.22 of the Core Strategy states that: "The indicative figures also allow a flexible approach which will allow the council, including through the preparation of the Site Allocations DPD, and local communities preparing neighbourhood plans, to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan". By restricting allocations only to those community areas and settlements that haven't met their indicative requirements, a rigid and negative approach is taken, frustrating sustainable development, contrary to the core strategy and contrary to national policy. The plan is not sound in its current form as it is not positively prepared and inconsistent with national policy.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Gleeson control land that is capable of making a sustainable contribution towards Wiltshire's future housing supply. it is therefore important we are able to participate orally to expand on the comments made.				

Comment ID:	3174	Consultee Oliver Taylor Gleeson Strategic Land Ltd Person ID: 449270	Agent Person ID:	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Great Somerford Gleeson controls the land edged red on the enclosed site plan. Part of the site is proposed for allocation in the emerging Neighbourhood Plan – examiner’s report dated 21 August 2017. Gleeson maintains that its wider landholding would provide an extension of the existing and proposed housing development that is both suitable and sustainable. If allocated, it would be deliverable with reference to the NPPF footnote 11. With reference to the above, there is no reason as to why a sustainable development should not be allocated at Great Somerford in the Site Allocations DPD. Whilst we acknowledge that the Great Somerford Neighbourhood Plan has allocated sufficient sites to meet indicative housing requirements set out in the Wiltshire Core Strategy this indicative requirement should not be seen as a minimum or a ceiling to development. The Core Strategy Inspector was clear that the total housing requirement of 42,000 should be seen as a minimum as the objectively assessed housing need at the time was in fact 44,000. As a larger village within the Malmesbury Community Area, Great Somerford is a sustainable location and should be delivering more development, over and above the indicative requirement to help meet this need. Furthermore, the Council’s evidence base is flawed as it fails to consider all locations by excluding areas where there are neighbourhoods in play. As a larger villages Great Somerford is one of the most sustainable locations within the Malmesbury Community Area and should be considered for additional growth. The existence of a neighbourhood plan does not meet that Great Somerford should not be considered in terms of its ability to accommodate more growth. By means of examples, the Farnham Neighbourhood Plan was made on the 28 July 2017. Following its adoption modifications to the Waverley Local Plan Part 1 have been considered by the Council, increasing Farnham’s overall housing requirement, with additional sites to be allocated over and above those allocated in the made Neighbourhood Plan. Waverley Borough Council has sought legal advice on this approach which has confirmed it is appropriate and that full weight can still be attributed to the Neighbourhood Plan in these circumstances. The Council’s Sustainability Appraisal has excluded sites at Great Somerford from the assessment process should have considered them in Gleeson’s opinion together with their sustainability credentials and the benefits they may deliver. There are no major constraints to development on the site. The land is located away from environmental and flood risk constraints to the north and east of the village. This area is well contained within the wider landscape and there are no technical constraints to development. It is submitted that the site is deliverable, available and offers a suitable location to deliver new housing with a realistic prospect that housing will be delivered on site within the Plan period.</p>			
Attached files (Please see Objective)	4747393			
If your representation is seeking a change, do you consider it necessary to	Gleeson control land that is capable of making a sustainable contribution towards Wiltshire’s future housing supply. it is therefore important we are able to participate orally to expand on the comments made.			

participate at the oral part of the examination?	
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Comment ID:	3175	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We object to building approximately ten dwellings on this site as it will impact badly on skyline views and the existing important recreational walkway to Old Sarum. At present the footpath is pleasantly open. Putting a fence along it will shut it in and destroy its character. It will also make it more secluded and less safe. The top of the ridge here has always been protected because of its recreational and visual importance.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3176	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.2			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We object to building approximately ten dwellings on this site as it will impact badly on skyline views and the existing important recreational walkway to Old Sarum. At present the footpath is pleasantly open. Putting a fence along it will shut it in and destroy its character. It will also make it more secluded and less safe. The top of the ridge here has always been protected because of its recreational and visual importance.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3177	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We object to this site because it will badly affect views of the cathedral and the appearance of the valley as a whole.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3178	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	1. The site floods from time to time and properties in the adjoining Lower Road have had problems with flooding.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3179	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	2. A new bridge into Salisbury is urgently needed. The chaos recently at New Bridge road during repairs show how unacceptable it is for Salisbury to have only one bridge from the south, plus the ancient and narrow old Harnham bridge. New Bridge Road is effectively the only access to the hospital from the city, and such a restricted access is surely unacceptable in times of terrorist activity. There is a road to the north of the river in Churchfields which should be linked to Harnham as was original planned. Building on the proposed site cannot be allowed to block this potential new route.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3180	Consultee Mr & Mrs Roderick & Priscilla Mackay	Agent	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 873511	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.4		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	This site is reasonable but a major consideration is the need for better traffic access to Salisbury from the south before any further development is allowed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3181	Consultee Mr Graham Ritchie	Agent Miss Julia Mountford Associate Director	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 933220	Boyer Planning Person ID: 1138250	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Boyer has been appointed by DWS to act on their behalf in respect of the promotion of their land interest at 'Land to the East of Royal Wootton Bassett'. A site location plan is attached at Appendix 1.</p> <p>The site is approximately 26.7 hectares and lies on the eastern of Royal Wootton Bassett and is approximately 1.8km to the east of the town centre. To the north of the site lies the A3102 Swindon Road, whilst to the west lies the Eastern Distributor Road beyond which is a significant amount of residential development. To the south and to the east lie unnamed rural lanes.</p> <p>The site has the capacity to accommodate c.600 dwellings. In addition to the contribution to Wiltshire's housing supply in a sustainable location, the site is also capable of delivering improved infrastructure which will benefit the wider community as well as the site.</p> <p>Distribution of housing</p> <p>Notwithstanding the objection that the HADPD has not been positively prepared, our client DWS notes that the housing distribution through Core Policies 4, 7, 8, 10-15, 17-20, 23, 26-27, 29 and 31- 33 reflect the indicative distribution in table 1 (page 48) associated with Core Policy 2. As acknowledged by Wiltshire in the preparation of the HADPD, additional housing can be allocated in areas where theoretically the indicating requirement has been met. Consequently, although the Royal Wootton Bassett Community Areas has fulfilled the indicative requirement in Core Policy 19, this does not prevent the authority allocating additional sites such as that controlled by DWS.</p> <p>Additionally, although a Neighbourhood Plan is being prepared for Royal Wootton Bassett, the examination of the Submitted Plan (March 2017) has yet to occur. Given the representations submitted in response to the Regulation 16 public consultation undertaken by Wiltshire Council following the formal submission of the Royal Wootton Bassett Neighbourhood Plan by Royal Wootton Bassett Town Council (including the response on behalf of DWS attached at Appendix 3), there is no certainty that the document as prepared will be endorsed by the Examiner. Consequently, it is appropriate for the Inspector examining the HSADPD to consider the suitability of the land controlled by DWS (east of Royal Wootton Bassett).</p> <p>Whilst the Core Strategy Partial Review must ensure that the Council has an up-to-date housing need position and sufficient sites to meet this identified housing need, pending its preparation the HSADPD should include additional sites (including land controlled by DWS east of Royal Wootton Bassett). This will ensure that Wiltshire will be able to demonstrate a 5 year supply of housing against a robust objective assessment of its needs.</p>				
Attached files (Please see Objective)	4747493 / 4747491				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	The attached letter details why the DPD is not considered to be sound and we would welcome the opportunity to discuss housing numbers and the emerging evidence base as part of the Examination.				

Comment ID:	3182	Consultee Mr Graham Ritchie Person ID: 933220	Agent Miss Julia Mountford Associate Director Boyer Planning Person ID: 1138250	Do you consider the draft WHSAP is legally compliant?	No
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Land Supply		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>These representations have been prepared on behalf of David Wilson Homes Southern (DWS) in respect of the pre-submission draft Wiltshire Site Allocation Plan, 2017.</p> <p>Planning policy position Core Strategy</p> <p>In January 2015 the Wiltshire Core Strategy was adopted. A significant requirement of the Examination in Public (EiP) Inspector was that the Council must commit to partially reviewing the Core Strategy to enable an adequate development plan basis for decision making over the plan period to 2026(Wiltshire Core Strategy, Inspector's Report December 2014 – Non-Technical Summary).</p> <p>Notwithstanding this commitment the plan was found sound with Main Modifications requiring a commitment to an early review. The plan makes provision for a 'minimum housing requirement (dwellings)' of 42,000 new homes in the plan period from 2006 to 2026 (Core Policy 2). The plan seeks to ensure that there is a continuous supply of housing over the plan period. Royal Wootton Bassett was identified in the Core Strategy as being capable of accommodating 1,070 dwellings (Core Policy 19).</p> <p>On the matter of the housing requirement the Inspector concluded in the EiP report (Paragraph 20 Wiltshire Core Strategy, Inspector's Report, December 2014) that:</p> <p>'Whilst this is not the preferable 15 year horizon advised by the Framework, such a period is specifically supported by the available evidence and, on balance, is sufficient to be considered appropriate and does not run counter to the PPG. Simple extrapolation of growth rates to extend the CS period would be a crude means to simply meet a 15 year aspiration; such an approach is not warranted in light of the Council's intention to monitor the effect of the CS and to ensure it is subject to partial review at an early date. Indeed, the Council has clarified that it will be undertaking a planned early review of the CS to ensure the development provision looks to an appropriately long term end date which will be supported by an updated Strategic Housing Market Assessment (SHMA)'.</p> <p>At paragraph 81 of the Inspector's report the Inspector reconfirms the Council's intention to produce a new SHMA 'by early 2016' which could revise the objectively assessed housing need for the HMAs and will inform the plan making process. Instead, the Council has to date concentrated upon the short to medium term housing requirement identified by the Core Strategy by preparing the Housing Allocations Development Plan Document (HADPD).</p> <p>Strategic Housing Market Assessment/ Housing Need Evidence Base</p> <p>A Strategic Housing Market Assessment (SHMA) and Functional Economic Market Assessment (FEMA) has been prepared jointly by Wiltshire Council and Swindon Council. Whilst they have to date still not been made public, an update on these documents was originally provided to the Swindon and Wiltshire Local Enterprise Partnership (SWLEP) Joint Strategic Economic Committee on 14th February 2017. It was acknowledged at that time that there would be some concern about 'opening the floodgates' to the market/ development industry upon publication. Given this statement, it is anticipated that the SHMA will identify an increase in objectively assessed need across Wiltshire.</p>				

This conclusion is supported by the fact that the Wiltshire Core Strategy currently makes provision for, 'at least 42,000 new homes in Wiltshire in the plan period from 2006 to 2026...' This equates to 2,100 dwellings per annum. Whilst the Core Strategy Inspector accepted that at least 42,000 new homes was an appropriate figure for the Core Strategy pending its review, he nevertheless stated (paragraph 78) that "Overall, the balance of evidence suggests that the objectively assessed housing need, to be disaggregated across the three Wiltshire HMAs, is currently in the region of 44,000 dwellings over the plan period [2006-26]." The adopted Swindon Borough Local Plan sets out that 'not less than 22,000 dwellings between 2011 and 2026' will be provided.

Whilst the breakdown for the two authorities has not to date been published, the report to the Joint Strategic Economic committee meeting of 28 June 2017 then indicated that the new SHMA required 3,650 dwellings per annum across the two authorities (as compared to 3,600 in their existing plans).

It is also noteworthy that there is currently a consultation on the standardised methodology for calculating housing need taking place until 9th November 2017. Whilst clearly a consultation document, using the standardised methodology approach the new housing need for 2016 to 2026 for Wiltshire would be 2,227 dwellings per annum. This represents a notable increase from the existing Core Strategy figures and would be above that assessed by the Core Strategy Inspector as being the objectively assessed housing need.

Local Development Scheme

In addition to the commitment to undertake an early partial review, Wiltshire Council's January 2015 Local Development Scheme (LDS), set out that the Core Strategy was to be supported by four further Development Plan Documents (DPDs). One of these documents is the Wiltshire Housing Site Allocations Development Plan Document (HSADPD).

The January 2015 LDS set out that this DPD (the subject of these representations) was originally intended to be adopted in June 2016. The LDS reflects Paragraph 1.3 of the Core Strategy which states that the Council is committed to bringing forward a suite of plans designed to support the Core Strategy that collectively deliver the Council's aspirations for growth across Wiltshire.

The updated Local Development Scheme for Wiltshire Council considered at Cabinet on 12th September sets out a consultation on the scope of the Partial Review will be undertaken at the end of this year, with an options consultation at the end of 2018 and adoption anticipated early 2021.

Maintaining a supply of housing

One of the identified purposes of the plan set out in paragraph 1.1 of the HSADPD is to, 'Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026.'

Paragraph 49 of the NPPF is clear that, 'Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.'

The delays in the progression of the HSADPD mean that the Council has new evidence regarding their objectively assessed housing needs, i.e. the SHMA together with the Government's consultation on planning for housing. Whilst the former document is currently not publically available, from the information that has been published, there is substantial weight given to the fact that the Council's housing numbers have increased, thereby rendering the Core Strategy policies regarding the supply of housing, out-of-date. This view is supported by the information published alongside the Government's planning for housing consultation.

Given the new evidence base available to the Council, it is not clear how it is possible to consider that this emerging plan (the HADPD) has been positively prepared. To be 'positively prepared', the plan 'should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so...'

The publication of the relevant and currently available evidence base would allow consideration of whether the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence, i.e. whether it is justified. Without the publication of the SHMA, this assessment is not possible to make, although the Government's planning for housing consultation enables an informed decision to be made. However, given that the indications are that the housing need is increasing in Wiltshire, other strategies now require consideration.

Given the inter-relationship of Wiltshire and Swindon Council's, it is imperative that the available up- to-date information on the HMAs is published to enable consideration of whether the emerging plan is based on effective joint working on cross-boundary strategic priorities, i.e. whether it is 'effective' and accords with national policy. This is especially important given the conclusions (14 July 2017) of the Secretary of State in the recovered appeal (APP/U3935/W/16/3147902) on land east of Marlborough Road, Wroughton, Swindon that Swindon Borough had less than a 2.5 years supply (paragraph 16), decision attached at Appendix 2.

	<p>In conclusion, it is not possible to conclude that the HSADPD plan is sound and prepared in accordance with the duty to cooperate, without the publication of the SHMA. It is anticipated that were this available piece of evidence published, it would demonstrate that the objectively assessed housing needs of Wiltshire were not being met. Subsequently, in accordance with paragraph 49 of the NPPF, relevant policies for the supply of housing within the Core Strategy would then not be considered up-to-date. Given that the HSADPD is one of a suite of plans to support the Core Strategy, the housing policies in this document would then also be rendered out-to-date as it would not be able to demonstrate the necessary 5 year supply of housing against a robustly calculated objective assessment of needs.</p> <p>In accordance with Wiltshire Council's original commitment, the early Partial Review should therefore be progressed without delay. This should be based on an up-to-date evidence base that seeks to inter alia meet objectively assessed need and is prepared in accordance with the Duty-to- Cooperate.</p>
Attached files (Please see Objective)	4747492
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3183	Consultee Neston Park Estate Person ID: 1138214	Agent Mr Geraint Jones Savills (UK) Ltd Person ID: 1095360	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Justified Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.39				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>These representations have been prepared by Savills on behalf of Neston Park Estate, in response to Wiltshire's draft Housing Site Allocations Plan (dHSAP).</p> <p>The representations set out our concerns with the Council's approach to housing delivery within the villages of Atworth and Whitley, and specifically the review of settlement boundaries and the need for additional land to be allocated to ensure the objectively assessed need for the villages is met within the plan period. As set out within these representations, land under the ownership of Neston Park Estate falls within the built form of Whitley and Atworth and the settlement boundaries should be revised to reflect this.</p> <p>These representations specifically comment upon the approach to the review of settlement boundaries set out in Chapter 6 and Appendix A of the dHSAP, with revised plans of the two villages set out in the Appendices of the representation.</p> <p>[Officer note: the appendices referred to are set out below in this Comment, and two other Comments with ID 3184 (Appendix 2) and 3185 (Appendix 3).]</p> <p>Appendix 1: West Farm, Atworth</p> <p>Atworth is identified in the Wiltshire Core Strategy as a 'Large Village' within the Melksham Community Area. Chapter 6 of the dHSAP states that settlement boundaries have been reviewed as part of the plan with the objective of ensuring there is a clear definition of the extent of the built up areas within Large Villages. However, West Farm, which falls under the ownership of Neston Park Estate incorrectly remains outside the settlement boundary of Atworth.</p> <p>The plan attached at Appendix 1 shows the revised settlement boundary and location of the land at West Farm, Atworth. The site is located in the western area of Atworth, along the A365; the primary road which runs east/west through the village. West Farm is within close proximity to the centre of the village and is highly accessible, with a bus stop approximately 100m to the west of the site.</p> <p>The existing settlement boundary of Atworth extends to include the built form to the west of the site, including the Bear Garage Petrol Station and dwellings off Bradford Road and has been reviewed to include the land to the south east of West Farm, however excludes West Farm. The site comprises predominantly built form which runs continuously within the settlement, and as such, in accordance with Chapter 6's objective, the land should be included within the settlement boundary of Atworth. The dHSAP should be amended to reflect this.</p> <p>Conclusion</p> <p>Overall, we are concerned with the robustness of the Council's approach in relation to reviewing settlement boundaries, in particular at Atworth and Whitley, both of which are classified as Large Villages and fall within the Melksham Community Area. In our view, the Council has not taken into consideration the built form of the three sites highlighted in this representation and the revised settlement boundaries do not reflect the existing composition of the two settlements; contrary to the Council's objective.</p> <p>The review of Atworth's settlement boundary fails to include West Farm which is located on the main road through the village and Atworth Business Park, a key employment site in the village. In our view, should Atworth be required to deliver housing, land to the east of Atworth</p>			

	<p>Business Park is suitable, available and achievable, in accordance with the requirements of the NPPF and is well placed to deliver small scale residential development.</p> <p>The settlement boundaries of Atworth and Whitley should be extended to include the land at West Farm, Atworth Business Park and Whitley Farm.</p>
Attached files (Please see Objective)	4747615
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Yes.

Comment ID:	3184	Consultee Neston Park Estate	Agent Mr Geraint Jones Savills (UK) Ltd	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138214	Person ID: 1095360	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.39		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>These representations have been prepared by Savills on behalf of Neston Park Estate, in response to Wiltshire's draft Housing Site Allocations Plan (dHSAP).</p> <p>The representations set out our concerns with the Council's approach to housing delivery within the villages of Atworth and Whitley, and specifically the review of settlement boundaries and the need for additional land to be allocated to ensure the objectively assessed need for the villages is met within the plan period. As set out within these representations, land under the ownership of Neston Park Estate falls within the built form of Whitley and Atworth and the settlement boundaries should be revised to reflect this.</p> <p>These representations specifically comment upon the approach to the review of settlement boundaries set out in Chapter 6 and Appendix A of the dHSAP, with revised plans of the two villages set out in the Appendices of the representation.</p> <p>[Officer note: the appendices referred to are set out below in this Comment, and in two other Comments with ID 3183 (Appendix 1) and 3185 (Appendix 3).]</p> <p>Appendix 2: Land to the east of Atworth Business Park, Atworth Amendment to settlement boundary</p> <p>The dHSAP proposes alterations to the settlement boundary to include dwellings which are located to the north of the main settlement of Atworth off Purlpit, however it excludes Atworth Business Park. As shown in Appendix 2, Atworth Business Park falls within the south eastern area of the village and comprises a number of industrial units and associated land to the east. The site comprises a significant proportion of built form, and provides important employment space to Atworth and Wiltshire, with a number of companies including Bristol Soap and Interconics located in the park.</p> <p>In comparison to the land off Purlpit, the site is located within close proximity to the A365 and local facilities within Atworth. In addition, Atworth Youth Club falls within the northern area of the land, and given the services it provides, including Babies and Toddlers Group, Brownies and Guides, it is considered to fall within the settlement boundary of Atworth and the emerging dHSAP should be amended to reflect this to follow the existing built form of the village.</p> <p>Potential site to deliver small scale residential development</p> <p>Given the site's context, with built development surrounding the site, the land to the east of Atworth Business Park is considered to be suitable, available and achievable (deliverable and developable) in accordance with the requirements of the NPPF. Should housing need to be delivered in Atworth to meet Melksham Community Area's housing target, the site is extremely well placed to accommodate the delivery of small scale residential development. The site is sustainably located with local facilities within walking distance.</p> <p>An initial feasibility study has indicated that there is capacity for approximately 30 dwellings, with the retention and improvement of Atworth Youth Club, landscaping and provision of a multi use games area (MUGA). Access to the site is already provided through the existing Atworth Business Park and would provide a logical, small scale extension to Atworth. The development of the site would allow for the enhancement of youth facilities within the village, and ensure an appropriate relationship to the existing employment use at Atworth Business Park is maintained.</p>				

	<p>Conclusion</p> <p>Overall, we are concerned with the robustness of the Council's approach in relation to reviewing settlement boundaries, in particular at Atworth and Whitley, both of which are classified as Large Villages and fall within the Melksham Community Area. In our view, the Council has not taken into consideration the built form of the three sites highlighted in this representation and the revised settlement boundaries do not reflect the existing composition of the two settlements; contrary to the Council's objective.</p> <p>The review of Atworth's settlement boundary fails to include West Farm which is located on the main road through the village and Atworth Business Park, a key employment site in the village. In our view, should Atworth be required to deliver housing, land to the east of Atworth Business Park is suitable, available and achievable, in accordance with the requirements of the NPPF and is well placed to deliver small scale residential development.</p> <p>The settlement boundaries of Atworth and Whitley should be extended to include the land at West Farm, Atworth Business Park and Whitley Farm.</p>
<p>Attached files (Please see Objective)</p>	<p>4747602</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Yes.</p>

Comment ID:	3185	Consultee Neston Park Estate Person ID: 1138214	Agent Mr Geraint Jones Savills (UK) Ltd Person ID: 1095360	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Positively prepared Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.42. Whitley				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>These representations have been prepared by Savills on behalf of Neston Park Estate, in response to Wiltshire’s draft Housing Site Allocations Plan (dHSAP).</p> <p>The representations set out our concerns with the Council’s approach to housing delivery within the villages of Atworth and Whitley, and specifically the review of settlement boundaries and the need for additional land to be allocated to ensure the objectively assessed need for the villages is met within the plan period. As set out within these representations, land under the ownership of Neston Park Estate falls within the built form of Whitley and Atworth and the settlement boundaries should be revised to reflect this.</p> <p>These representations specifically comment upon the approach to the review of settlement boundaries set out in Chapter 6 and Appendix A of the dHSAP, with revised plans of the two villages set out in the Appendices of the representation.</p> <p>[Officer note: the appendices referred to are set out below in this Comment, and two other Comments with ID 3183 (Appendix 1) and 3184 (Appendix 2).]</p> <p>Appendix 3: Whitley Farm, Whitley</p> <p>Whitley is identified in the Wiltshire Core Strategy as a ‘Large Village’ within the Melksham Community Area. As aforementioned, the first objective for the Plan is to review settlement boundaries to define the existing extent of the built up areas at Large Villages.</p> <p>The revised settlement boundary of Whitley includes significant alterations to include the built form of the village at the north and east of the village, however fails to acknowledge the existing built form of the western area of the village. Whitley Farm, identified on the plan attached at Appendix 3, is located outside, but adjacent to the settlement boundary for Whitley. The site comprises built form, currently comprising a number of agricultural buildings and a farmhouse, which lie off First Lane.</p> <p>The revised settlement boundary is unjustified and includes all built form surrounding the village with the exception of Whitley Farm. In comparison to other sites within the village, Whitley Farm is sustainably located within close proximity to a number of village amenities, including Pear Tree Inn and Daisy Chain pre-school. In addition, the settlement boundary now includes the linear development of the village to the west of West Hill which, in comparison to Whitley Farm, is not located within close proximity to the settlement of Whitley.</p> <p>The exclusion of Whitley Farm from the revised settlement boundary of the village is unjustified, and given its location adjoining the settlement, the extent of the site’s built form, it is considered the site falls within the settlement boundary of the village and the dHSAP should be amended to reflect this.</p> <p>Conclusion</p> <p>Overall, we are concerned with the robustness of the Council’s approach in relation to reviewing settlement boundaries, in particular at Atworth and Whitley, both of which are classified as Large Villages and fall within the Melksham Community Area. In our view, the Council has not taken into consideration the built form of the three sites highlighted in this representation and the revised settlement boundaries do not reflect the existing composition of the two settlements; contrary to the Council’s objective.</p> <p>Whitley Farm is built form which adjoins the settlement of Whitley and the settlement boundaries should be revised to acknowledge this.</p>			

	The settlement boundaries of Atworth and Whitley should be extended to include the land at West Farm, Atworth Business Park and Whitley Farm.
Attached files (Please see Objective)	4747579
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Yes.

Comment ID:	3186	Consultee Mr Francis Morland Person ID: 397159	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	The whole document			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Please accept this e-mail as my duly made response.</p> <p>I do not consider that the Plan is sound because it is not positively prepared, not justified, not effective and not consistent with national policy. In respect of the proposed allocations, I do not think it is consistent with or justified by the Wiltshire Core Strategy. Core Policy 1 of the WCS identifies the Settlement Strategy/hierarchy and the Principal Settlements of Chippenham, Trowbridge and Salisbury. Core Policy 2 (Delivery Strategy) requires that 24,740 new dwellings are completed in the Plan period (2006-2026) in the North and West Wiltshire Housing Market Area, but the breakdown of that figure within the HMA, including Trowbridge 6,810 and Chippenham 4,510, is only indicative, and it is now clear that those indicative figures are not sound or sustainable, and should be amended to 5,660 for each of the Principal Settlements within that HMA (viz. Chippenham and Trowbridge).</p> <p>In planning terms, Trowbridge is much more constrained than Chippenham and the existing figures ought to have taken account of that, but for purely political reasons did not.</p> <p>Hence the Plan is unsound in seeking to remain with and implement the indicative figures.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I wish to attend the Examination in Public on all of the above issues.				

Comment ID:	3187	Consultee Mr Francis Morland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 397159		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Plan is also unsound in its assessment of the current 5 Year Housing Land Supply position because although it includes an allowance (of 925 units) for brownfield windfall completions, it omits any allowance for greenfield windfall completions. The evidence of Table 3 in the recent HLS Statements demonstrates that greenfield windfall completions in the remainder of the Plan period will be very substantial (and will far exceed brownfield windfall completions), so the omission of an appropriate allowance for them is irrational and unsound. The NPPF does not preclude the inclusion of such an allowance in the computation of the 5YHLS.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I wish to attend the Examination in Public on all of the above issues.				

Comment ID:	3188	Consultee Mr Francis Morland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 397159		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>With these changes, there can be no justification for the many proposed allocations around Trowbridge (see H2.1 to HH2.6) totalling 800 dwellings, and in particular for the "less sustainable option for development" at Southwick Court (H2.6 - SHLAA 3565) of 180 dwellings. I concur with the many site specific objections to this site detailed in other consultation responses, including those of Historic England on the heritage setting of Southwick Court itself (Grade ii* listed) and of the Environment Agency against development within areas of Flood Zones 2 and 3 within the site and in close proximity to the Lambrook watercourse.</p> <p>As a matter of principle, both for this allocation site and the others around Trowbridge, I also regard it as wholly unsound to draw the red line boundaries larger than what is required for the stipulated number of dwellings themselves. Various numbers are quoted in the supporting papers about the capacity of the Southwick Court allocation site (viz. c.280, 273 and 237) and it is also suggested that no houses will be located between Frome Road (A361) and the Lambrook. The clear lesson that Spatial Planning should already have learned from the grossly oversized Warminster West allocation in the WCS is that developers will always seek to maximise the number of dwellings within the allocation red line regardless of the number stated for it. So the only safe and sound approach is to restrict the red line precisely to that required for the number of dwellings stated in the Plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I wish to attend the Examination in Public on all of the above issues.				

Comment ID:	3189	Consultee Mr Francis Morland	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 397159		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.10 Barters Farm		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Turning to the Warminster Community Area Remainder, I object to the allocation H2.10 Barters Farm Nurseries Chapmanslade of 35 dwellings, both because no allocation is required to meet the indicative figure for that area - the existing figures indicate that it will be fully met in the remainder of the Plan period by windfall development - and because I consider it unreasonable and unfair to the other large villages within the area (viz, Corsley, Sutton Veny, Heytesbury and Codford) not to spread the number required more evenly over the area. The LPA's assessment of the relevant sustainability factors is entirely unsound - for example, bus services to all the other large villages are much better than Chapmanslade's.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I wish to attend the Examination in Public on all of the above issues.				

Comment ID:	3190	Consultee Mr Francis Morland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 397159	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Turning to the Westbury Community Area Remainder, I support the allocation H2.14 at Bratton of 40 dwellings (if that number is correctly assessed - see above) and would object to allocating anything at Dilton Marsh, which would prejudice its evolving Neighbourhood Plan.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I wish to attend the Examination in Public on all of the above issues.				

Comment ID:	3191	Consultee Mr Francis Morland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 397159	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.58		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On the Settlement Boundaries Review, I object to including the West Wilts. Trading Estate within the Westbury Settlement Boundary and the White Horse Business Park within the Trowbridge Settlement Boundary. It is unsound to do so and will lead to conflicting planning uses and potential loss of the employment capacity intended in the WCS (the proposals for the former Virgin Mobile offices illustrate that). Furthermore, the WWTE is now and always has been within the parish of Heywood, not the Town of Westbury, [cont.] So it is contrary to Topic Paper 1 Settlement Boundary Review Methodology to include them within the Settlement Boundaries of those Towns, rather than outside the Settlement Boundaries of Large Villages.</p> <p>Turning to the proposed extensions to the Westbury TPL in the Town of Westbury, I object as unsound to the inclusion of Leighton House, Westbury railway station and car parks, the White Horse Health Centre and carpark, the Leighton Sports Centre and the Westbury Leigh Primary School and playgrounds. In the long term this puts at risk their availability for their existing public uses, and in the case of Leighton House pre-empts any ideas in the evolving Neighbourhood Plan as to how to protect and make best use of this site when it is sold by the MoD as surplus to its requirements. It is a crucial issue in planning the future of Westbury.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	I wish to attend the Examination in Public on all of the above issues.				

Comment ID:	3192	Consultee Mr Francis Morland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 397159	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.48		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		[cont.]and the White Horse Business Park is now and always has been within the parish of North Bradley, not the Town of Trowbridge. So it is contrary to Topic Paper 1 Settlement Boundary Review Methodology to include them within the Settlement Boundaries of those Towns, rather than outside the Settlement Boundaries of Large Villages.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I wish to attend the Examination in Public on all of the above issues.			

Comment ID:	3193	Consultee Mr Francis Morland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 397159	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.51		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Turning to the proposed Settlement Boundary of Southwick, I object to the extensions of the existing VPL as unsound, particularly those at the western end of the village, such as 100 Frome Road, and the large house on the opposite side of Frome Road, and another on the west side of Wesley Road, which will seriously prejudice its evolving Neighbourhood Plan.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I wish to attend the Examination in Public on all of the above issues.			

Comment ID:	3194	Consultee Mr Francis Morland	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 397159	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.53		Justified	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Turning to the proposed Settlement Boundary of Chapmanslade, I object to the extension of the existing VPL to include its playing field and village hall, which is unsound and in the long term puts at risk the availability of these facilities for public use.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		I wish to attend the Examination in Public on all of the above issues.			

Comment ID:	3195	Consultee Forum Trustees Ltd & Lutea Trustees Ltd	Agent Miss Rebecca Smith Senior Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1136806	Charter House Planning Ltd	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Land b/w Winterbourne Earls Village School & Railway			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocations Plan is not properly justified as it has failed to account for the potential to contribute much-needed housing through the development of SH LAA sites 90, 91 and 92 (Land between Winterbourne Earls Village School and the Railway Line, Winterbourne Earls).</p> <p>Sites 90 91 and 92 was discounted from the site selection process at stage 3 due to the major adverse effects associated with air quality specifically regarding odour from the nearby pig farm". However, it is considered that there are material considerations which demonstrate that future development will not be affected by odours from the Manor Farm Pig Unit. A planning balance demonstrates that the impact of infrequent odours will be demonstrably outweighed by the benefits the development can provide. The site should therefore be re-considered. Please see attached document and letter for futher details.</p> <p>The allocation of sites 90, 91 and 92 for residential development with the emerging Allocations Plan would help the LPA deliver the most appropriate strategy for housing development within Wiltshire.</p> <p>Presently, the site selection process has idenitified no suitable alternative sites for Winterbourne Earls and as such, the plan is not justified.</p>				
Attached files (Please see Objective)	4747861				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3196	Consultee Mctaggart & Mickel Person ID: 861027	Agent Mr Jonathan Chick Planner Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Justified Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.	Housing delivery strategy. East HMA.				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Introduction 1.1.1 These representations have been prepared by Walsingham Planning Ltd (WP) on behalf of Mctaggart & Mickel Homes Ltd (MMH) and relate to Wiltshire Council's (WC) consultation on the Pre-Submission Site Allocations Development Plan Document 'SADPD' (June 2017). 1.1.2 MMH have a general interest in Wiltshire Council's forward planning but specifically in relation to Land off Coate Road in Devizes, as edged red on the attached site location plan (Appendix1). Notably the site has been assessed as part of a slightly larger area of land in the Strategic Housing Land Availability Assessment (SHLAA) 2012 as a suitable site, available for development now, and capable of accommodating 495 dwellings (Ref: Site 693). 1.1.3 A planning application was submitted for up to 350 dwellings and retail uses on this land in January 2013 (LPA Ref: 2013/0083/OUT) which was subsequently refused by Wiltshire Council. This application was then subject to a planning appeal (PINS Ref: 2206963). 1.1.4 Whilst the site was ultimately dismissed at appeal by the Secretary of State following a positive recommendation from the Inspector, its suitability and sustainable credentials have been firmly established. The only reason the site was dismissed was due to the status of the emerging Devizes neighbourhood plan at the time. The site was deemed acceptable in all other regards with no technical issues outstanding. 1.1.5 The site was previously proposed by WC as a refined option for development in the informal consultation on the SADPD in February 2015 (Site Ref: 693a). Representations were made by RPS on behalf of MMH during this process. 1.1.6 The Wiltshire Core Strategy (WCS) was adopted in January 2015 and sets out the strategic vision for delivering sustainable growth over the period up to 2026. 1.1.7 A Neighbourhood Plan (NP) has also been made in Devizes (July 2015) which covers Devizes Town, Bishops Cannings and Roundway. The NP allocates sites of up to 65 dwellings for development in the area and has revised the limits of development around Devizes to accommodate the allocations. 1.1.8 The purpose of the Wiltshire SADPD is to: Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages; and Allocate new sites for housing to ensure the delivery of homes across the plan period in order to maintain a five year land supply in each of Wiltshire's three HMAs over the period to 2026. 1.1.9 It is noted that the draft SADPD only proposes site specific allocation policies which will supplement the strategic policies in the Wiltshire Core Strategy. 1.1.10 In accordance with the Council's Questionnaire these representations will consider the soundness of the SADPD and set out changes where appropriate which we consider necessary to make the Plan sound. Reference to the Council's evidence base is also made within these representations where appropriate.			

1.1.11 The National Planning Policy Framework (NPPF) makes it clear at Paragraph 182 that to be sound, a Local Plan should be positively prepared, justified, effective, and consistent with National Policy. In accordance with the Council's Questionnaire we have given consideration to the following points:

General Matters; [Officer note: These are discussed in Comment 3197]

Core Strategy Partial Review and SHMA; [Officer note: Discussed in Comment 3198]

Overall housing requirement in the East HMA; [Officer note: Discussed in Comment 3199]

Suitability of proposed allocations in the East HMA; [Officer note: Discussed in Comment 3200, 3201, 3202, 3203, 3204 and 3205]

The addition of Land off Coate Road as an Allocation in the SADPD. [Officer note: This is outlined below.]

1.1.12 Overall MMH raise concerns with the draft SADPD and consider that the Plan is unsound as currently drafted as it is not justified or consistent with national policy. To make the Plan sound further sites should be allocated to ensure a flexible supply of deliverable sites are available in the plan period.

1.1.13 This is particularly the case for the East HMA which includes Devizes, a sustainable Market Town (the largest in Wiltshire). As set out in the following sections [Officer note: This is set out below, within this Comment] Land off Coate Road in Devizes can accommodate a residential development which can significantly contribute to the housing supply in the East HMA. These representations are supported by a masterplan (Appendix 2), land use plan (Appendix 3) and appeal decisions for the site which help to confirm the sites overall acceptability (Appendix 4 and 5).

6.0 The addition of Land off Coate Road as an Allocation in the SADPD

6.1.1 As set out in the previous sections [Officer note: See comments 3197-3205] MMH consider that further sites should be allocated in the SADPD for the following reasons:

The status of the new SHMA and partial WCS review which could have implications on the OAHN in Wiltshire;

The flexible approach endorsed in the adopted WCS which suggests the overall housing requirement is a 'minimum' with 'indicative' requirements for each Community Area;

The doubts about the delivery of some sites in the East HMA and their build out rates;

Concerns regarding the suitability of sites proposed as allocations in Market Lavington.

6.1.2 Based on these points MMH consider that the plan is not justified and not consistent with national policy, therefore is not sound.

6.1.1 At a very minimum reserve sites should be allocated now in the event that the OAHN significantly increases when the SHMA is published/partial review of WCS takes place, but it would be prudent to allocate sites for development now which are available and can be delivered quickly to ensure the Council does not encounter problems in the future.

6.1.2 For the Plan to be considered sound the Council will also need to update its evidence base to include up to date Housing Trajectories (with a base date in March 2017).

In particular we draw the Council's attention to Land off Coate Road, Devizes which is a sustainable site capable of delivering significant housing development. The site is edged red on the attached site location plan (Appendix 1) and has previously been promoted for development. The site comprises a parcel of agricultural land immediately to the east of Windsor Drive on the edge and to the east of Devizes.

6.1.1 This site has been subject to planning applications and appeals in the past which help to confirm the sites overall suitability for development. Importantly the sites acceptability and sustainable credentials have been firmly established.

6.1.2 Notably the site has been assessed as part of a slightly larger area of land in the Strategic Housing Land Availability Assessment (SHLAA) 2012 as a suitable site, available for development now, and capable of accommodating 495 dwellings (ref: 693).

6.1.3 The site was subject to an outline planning application in 2013 for up to 350 dwellings and retail uses (LPA Ref: 2013/0083/OUT). This application identified that the site was suitable for development. The land still represents an opportunity for development and could make an important contribution to meeting future market and affordable housing needs. The site is available now and previous baseline assessments

have not identified any insurmountable constraints which would prevent development from coming forward. The planning application was supported by a suite of baseline assessments including a Landscape Visual and Impact Assessment (LVIA). The LVIA was considered by Wiltshire Council and no objections were received from the Landscape Architect.

6.1.4 The outline proposals included a number of significant infrastructure improvements in the local area. In particular this included a contribution to fund a new traffic signal controlled junction at the London Road/Windsor Drive roundabout along with other highway improvements along London Road identified as part of the Devizes strategy at the time. Additionally, the Applicant agreed to contribute to improve a roundabout further north at the Hopton Road/London Road junction and to improve connections to the canal along Windsor Drive Bridge. Thus, all the improvements which were proposed would contribute significantly to improving the traffic situation in Devizes and were agreed with Wiltshire Highways.

6.1.1 A number of the improvements proposed in the outline planning application are identified as essential sustainable transport infrastructure required in Devizes in the Wiltshire Infrastructure Delivery Plan 3 2011 – 2026 Appendix 1: Devizes Community Area (December 2016). Therefore, development on the Coate Road site would make an important contribution to the delivery of essential infrastructure required in Devizes in a timely manner.

6.1.2 The excellent and undisputed sustainability credentials of the site have been established in the Secretary of State's decision in October 2014 in relation to a proposal for up to 350 new homes (Appendix 4). This decision followed a planning appeal and public inquiry that considered all relevant issues in detail. Whilst the appeal was dismissed, despite a positive inspector's recommendation, because the site was not proposed to be allocated for housing in an emerging Neighbourhood Plan, the site is a suitable location for meeting future housing need in the form of a sustainable urban extension. The Inspector for the Coate Road appeal (Ref: 2206963) noted at Paragraph 218:

“Overall, it seems to me that housing development at the appeal site would relate well to the town and its facilities, and would contribute positively to the sustainability of the development pattern in this part of Wiltshire.”

The site went back to appeal following a high court challenge and again whilst it was ultimately dismissed by the Secretary of State in September 2016 (decision attached at Appendix 5), the proposals were considered as sustainable development based on assessment against the three dimensions set out in the Framework. At Paragraph 13 of his decision the Secretary of State noted:

“Having regard to the three dimensions of sustainable development (IR235-236), the Secretary of State agrees with the Inspector at IR237 that the potential economic benefits can be given significant positive weight. He also agrees with the Inspector (IR238) that that the scheme's substantial boost to housing supply is a significant positive aspect of the social dimension of sustainability, despite the fact that there is not an established current shortfall in the five-year housing land supply for the housing market area; and that the new open space, canal-side improvements and the availability of the local centre would provide further social benefits. For the reasons given at IR239, the Secretary of State agrees with the Inspector that these would also be environmental benefits to be placed in the balance alongside improvements to a cycle route and bus services; but that there would be a degree of harm to the countryside as a result of the extension of urbanisation beyond the existing edge of the built-up area.”

6.1.1 The site was also proposed as a refined option for development in the previous version of the SADPD (relating to the informal consultation in February 2015).

6.1.2 The land lies outside but immediately adjacent to the limits of development of Devizes and could be easily linked with existing services and infrastructure. Development at the site would also provide opportunities for delivering significant improvements to community infrastructure as well as appropriate employment opportunities for local people. For reference an illustrative masterplan is submitted in support of these representations to demonstrate how development on the site can be accommodated (Appendix 2). A Land Use Plan has also been submitted

which shows the different aspects of the scheme including a proposed woodland and vast multi functional green space and corridors around the site (Appendix 3).

6.1.3 Further proposals on land off Coate Road would be subject to a robust Community Engagement Programme which would provide residents, councillors and key stakeholders with the opportunity to discuss, comment, and leave feedback on the proposed new homes plans after the land was allocated, helping to shape any future planning application. A Public Exhibition would be held and Workshops/Seminars would be planned to gain key community input to the new homes proposals, and to enable plans to come forward for land off Coate Road which would benefit Devizes and have widespread public support. A website would support the draft allocation/new homes plans providing Devizes residents with clear, up to date and transparent information as the consultation progresses.

6.1.1 Overall MMH consider that this site should be allocated in the SADPD now to provide flexibility in the housing supply to support future housing requirements for the East HMA.

Suggested Changes to SADPD

6.1.2 To make the plan sound further consideration should be given to allocation of suitable sites in sustainable locations and further policies added. A policy should be included in the SADPD to reflect the allocation of Land off Coate Road, Devizes. This land should be included as an allocation for the following reasons:

The site is sustainable and has no technical constraints;

The sites suitability has been assessed and considered by both the Council and the Planning Inspectorate;

Market Towns such as Devizes (which is considered the largest in the whole of Wiltshire) have a significant role to play to deliver the 'minimum' Wiltshire housing requirement in the plan period;

The Wiltshire housing requirement is flexible and is not a cap on further development but is intended to encourage sustainable development on suitable sites;

The Devizes Neighbourhood Plan allocates site for up to 65 dwellings but the SADPD will ensure strategic sites can also come forward in sustainable locations in accordance with the WCS.

The East HMA is likely to require further housing in the near future once the new OAHN is known and for the period up to 2036 (including on land outside the limits of development) and therefore large strategic sites should be considered in the SADPD process now as they will make a significant contribution to meeting future needs.

6.1.2 The additional policy in the SADPD should include the following text:

“Policy X

Land off Coate Road, Devizes, as identified on the Policies Map, is proposed for residential development comprising the following elements:

Up to 350 dwellings;

Some retail uses;

Development will take place in accordance with a masterplan for the site approved by the Council as part of the planning application process.”

Attached files (Please see Objective)

4748103 / 4748107 / 4748104 / 4748106 / 4748105

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

As set out in the attached representations a number of issues are raised regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.

Comment ID:	3197	Consultee Mctaggart & Mickel	Agent Mr Jonathan Chick Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 861027	Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing supply / Evidence base			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>2.1.1 This section does not relate to a specific part of the site allocations document but raises general concerns. Housing Trajectories</p> <p>2.1.2 A Housing Trajectory is not included in the Plan or as an evidence base document. MMH consider it is very important for an up to date trajectory to be included in the Plan so that it is clear how many dwellings each site is expected to yield and at what point in the Plan period.</p> <p>2.1.3 We note that the latest trajectory available for public viewing is from the Wiltshire Housing Land Supply Statement dated November 2016. The Council have referred us to the 2016 Housing Land Availability Report showing the most up to date housing delivery figures (with a base date of April 2016), however no detailed housing trajectory is provided in this document.</p> <p>2.1.4 The draft SADPD is supported by a Five Year Land Supply Document – Topic Paper 3 (June 2017) which sets out Wiltshire’s housing land supply position, but this includes no detailed trajectory illustrating the expected delivery of housing sites over the plan period. Trajectories are essential for the testing of the deliverability of the housing land supply proposed to meet the housing requirement for the period of the SADPD.</p> <p>2.1.5 On this basis the Plan cannot be considered sound as it is not justified based on the most available evidence. Therefore, the evidence base needs to be updated for us to fully be able to consider the delivery of sites in Wiltshire and make the Plan sound. This will ensure the SADPD is up to date as required by Paragraph 17 of the NPPF.</p> <p>2.1.6 Should this evidence be provided in future versions of the Plan we reserve the right to provide further comment on the soundness of the Plan.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		As set out in the attached representations a number of issues are raised regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.			

Comment ID:	3198	Consultee Mctaggart & Mickel Person ID: 861027	Agent Mr Jonathan Chick Planner Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.		Core Strategy Partial Review & SHMA			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3.1.1 It is noted that since the WCS was adopted (in January 2015) the Council has committed to the preparation of a new joint Strategic Housing Market Assessment (SHMA) with Swindon Borough Council, in collaboration with other local authorities as necessary, to inform the need for a further review of Core Strategy policies in particular in relation to the housing market areas and levels of growth to extend the plan periods. The SHMA will inform the partial review of the Core Strategy and extend the plan period by 10 years until 2036.</p> <p>3.1.2 The commitment of the Council to provide a new SHMA is noted in the Inspectors Report for the WCS (dated 1st December 2014) in a number of paragraphs and has been a long standing item in previous versions of the Wiltshire Local Development Framework (LDF) but has been significantly delayed each time a new LDF is published. At the time the WCS was adopted it was anticipated the new SHMA would be ready by early 2016. The Inspector notes at Paragraph 81 of his Inspector report (December 2014): “Indeed, I am particularly mindful that the Council intends to produce a new SHMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes.”</p> <p>3.1.3 The latest LDF for Wiltshire dated December 2016 suggests that the new SHMA would be published in early 2017.</p> <p>3.1.4 The previous Wiltshire SHMA was published in December 2011 and provides the Objectively Assessed Housing Need (OAHN) for Wiltshire which was endorsed by the adopted Core Strategy and this also set out how the housing requirement has been disaggregated between the 3 HMA's and west of Swindon. This SHMA is now almost 6 years old.</p> <p>3.1.5 The reasoning behind the early review of the WCS is explained further in paragraphs 86 and 87 of the WCS Inspectors report in terms of the inclusion of 900 homes to the west of Swindon in Wiltshire's overall supply and the planned early review of the SHMA being the mechanism to review Wiltshire's relationship with Swindon in more detail.</p> <p>3.1.6 Paragraph 159 of the NPPF states the Local Planning Authorities should: "prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period "</p> <p>3.1.7 MMH are concerned with the timing of the proposed submission consultation on the SADPD (which allocates sites until 2026) and the fact it takes no account of the potentially imminent review of the WCS (which will allocate sites until 2036).</p> <p>3.1.8 Without the partial WCS review in place there is a risk that the SADPD (scheduled for adoption in winter 2018) along with any made Neighbourhood Plans in Wiltshire will become out of date very quickly. This is especially concerning considering the significant delays which have taken place with production of the SHMA (initially anticipated for early 2016).</p> <p>3.1.9 It is also important to note the further measures to boost housing supply in England set out in the governments recently published consultation 'Planning for the right homes in the right places: consultation proposals' (September 2017) which follows the publishing of the 'Housing White Paper' in February 2017. The consultation sets out proposals for a standard method for calculating local authority's housing need. The standard methodology approach suggests that LPA's may require a significant boost in housing in the future, this including Wiltshire</p>				

	<p>which is one of the larger LPA areas in the country. The new methodology proposes household projections as the starting point for each LPA area. It is important to note that the household projections figure simply shows the bare minimum that will be required in order to stand still and 'to boost significantly the supply of housing' for many LPA's including Wiltshire this number may raise significantly once further factors are taken into account.</p> <p>3.1.10 Based on the above and the uncertainty regarding the future OAHN for Wiltshire when details of the SHMA are still unknown, MMH consider Wiltshire have the following options: Delay further production of the SADPD until the new SHMA is published and details of the new OAHN are known; Allocate more sites in the SADPD now in the event that the OAHN is significantly increased when the SHMA is published; Allocate reserve sites in the SADPD now which can easily come forward should further sites be required when the SHMA is published. Continue work on the SADPD with a risk that it could become out of date very quickly once a new OAHN is known.</p> <p>3.1.11 MMH's preference would be for the allocation of more sites in the SADPD now which will provide certainty and flexibility to Wiltshire and will avoid the risk of having to restart this process again when the SHMA is available and the partial review of the WCS takes place. Indeed the adopted WCS housing requirement was identified as a 'minimum' to ensure opportunities for residential development can come forward in a sustainable manner without comprising the Plan, which ensures a flexible approach can be followed.</p> <p>3.1.12 As a minimum MMH consider that the SADPD must seek to identify reserve sites now relating to housing requirements to be included in the WCS review, including those extending beyond 2026. If it does not then there is a danger that there will be a significant housing shortage in the area in the future.</p> <p>3.1.13 The sites which the Council should be considering for allocation now should be the most sustainable sites in settlements which can accommodate a significant quantum of housing quickly, with a particular emphasis on available sites in Market Towns such as Devizes.</p> <p>3.1.14 Obviously the Council can continue preparing the SADPD to meet the requirements in the adopted WCS, however there is a risk that the result will be further work to find additional sites in the future when these sites could be considered now as part of this process.</p> <p>3.1.15 MMH will be monitoring the publishing of new evidence (such as the SHMA) from Wiltshire Council and reserve the right to provide further comment should this become available.</p> <p>3.1.16 The next sections [Comments 3199 and 3200] will consider the detail of the draft SADPD as currently proposed.</p> <p>Conclusion</p> <p>3.1.17 Based on the above MMH do not consider that the SADPD is sound as currently drafted as it is not the most appropriate strategy when considered against reasonable alternatives. For the Plan to be sound MMH would urge the Council to allocate more sites for residential development now to provide certainty and flexibility.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	As set out in the attached representations a number of issues are raised regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.

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Please identify the policy, paragraph, table, figure or site to which you are referring.		Overall housing requirements in East HMA		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Introduction 4.1.1 This section considers the overall housing requirements in the East HMA, the SADPD relationship with the Core Strategy and Neighbourhood Plans, and the delivery of sites in the East HMA. 4.1.2 Overall MMH consider that there is a need to allocate further sites for development in the East HMA to ensure a flexible approach to housing supply is followed. Site Allocations relation to the Core Strategy 4.1.3 Core Policy 1 of the adopted Core Strategy (WCS) sets out the settlement strategy for Wiltshire and identifies Devizes as a Market Town which are considered to have potential for significant development in the plan period. Core Policy 2 sets a ‘minimum’ housing requirement of 42,000 dwellings in Wiltshire between 2006 and 2026 which is distributed between three Housing Market Areas (HMA) in Wiltshire and the West of Swindon. 4.1.4 Paragraph 4.20 of the WCS summarises the Council’s flexible approach to housing to ensure sustainable development can come forward without being restricted by policies in the plan. It states: “Wiltshire’s proposed strategic housing requirement is set out against defined subcounty areas as identified within the Wiltshire Strategic Housing Market Assessment (SHMA). However, in order to support the most sustainable pattern of growth, in line with the principles defined in Core Policy 1, indicative requirements are provided for each Principal Settlement, Market Town and by Community Area within paragraph 4.26 below. The indicative figures also allow a flexible approach which will allow the council including through the preparation of the Site Allocations DPD and local communities preparing neighbourhood plans to respond positively to opportunities without being inhibited by an overly prescriptive, rigid approach which might otherwise prevent sustainable development proposals that can contribute to delivering the strategic objectives of the plan.” 4.1.5 This approach will ensure that there is flexibility to deliver more housing than the 42,000 proposed, and particularly as a new OAHN was envisaged at the time of the WCS adoption once the new SHMA was to become available (originally envisaged in early 2016 at the time). The Inspector stated at Paragraph 81 of his WCS Inspectors report: “Indeed, I am particularly mindful that the Council intends to produce a new SHMA by early 2016 which may revise the objectively assessed needs for the relevant HMAs affecting the county and which will inform its plan making processes. Consequently I consider that at this current time the minimum housing figure within the CS should reasonably equate to at least 42,000 homes over the plan period with the flexibility to deliver more.” 4.1.6 Core Policy 2 of the WCS sets out that sites for development will be identified through subsequent Site Allocations DPDs and by supporting communities to identify sites through neighbourhood planning. Therefore, the SADPD is the vehicle (along with neighbourhood plans) to allocate sites to meet the ‘minimum’ WCS housing requirement of 42,000 between 2006 and 2026.				

4.1.7 The 'indicative' housing requirements for each community area in the East Housing HMA derived from the draft SADPD are set out in Figure 4: Community Area Indicative Requirements [Officer note: It is assumed this is referring to Table 2.3 of the draft WHSAP]. This proposes an overall requirement of 5,940 in the plan period with 2,010 to be delivered in Devizes and 490 in the Devizes Community Area Remainder.

4.1.8 At paragraph 2.18 it states:

"There is no requirement for each individual Community Area or settlement to have five years supply of land for housing."

4.1.9 This is welcomed and reflects the flexible approach put forward in the WCS and will ensure that housing need can be met in different locations across each HMA without being fixed by a specific community area. This will ensure that sites in settlements which are identified as constrained and undeliverable can be swapped for sites in more sustainable areas which have capacity to accommodate further housing, should this be required. As explained further below, the 'indicative' requirement put forward in each Community Area allows this flexible approach.

4.1.10 Figure 5 [Officer note: It is assumed this refers to Table 4.1 of the draft WHSAP] of the draft SADPD suggests that 3,497 completions have taken place in the East HMA between 2006-2017 with 2,273 developable commitments available for the remainder of the plan period, leaving only a requirement of 170 dwellings. Importantly figure 5 [Officer note: assumed this refers to para 4.2] states this as 'minimum to be allocated' and is not a cap on further development which is consistent with Core Policy 2 of the adopted Core Strategy and reflects the aims of Paragraph 47 of the NPPF to 'boost significantly the supply of housing'.

4.1.11 MMH welcome that the requirement for each HMA has been expressed as a minimum. It will be important that the draft SADPD fully embraces this to ensure that sufficient sites which are suitable for development in sustainable locations can come forward in addition to the allocations proposed.

4.1.12 This will ensure a flexible approach to housing in Wiltshire and it is especially important to allocate enough sites now to reflect future requirements which may be required once further evidence is published relating to the OAHN.

4.1.13 On this basis MMH consider that additional site allocations over and above the 'minimum figures' specified in the plan should be set out in the SADPD now to ensure that there is greater certainty in the future. At the very least the Council should be allocating reserve sites to provide flexibility in the event further evidence is published relating to the OAHN.

Relationship to Neighbourhood Plans

4.1.14 It is acknowledged that neighbourhood plans have an important role to play in delivering housing requirements in Wiltshire in the plan period. At paragraph 2.22 of the draft SADPD it states:

"The work being done on Neighbourhood Plans influences the selection of sites⁶ and where Neighbourhood Plans have been 'made' or are well advanced the Plan leaves decisions on the scale and locations for growth in settlements to the communities concerned."

4.1.15 This is the correct approach, but it should be noted that 'made' Neighbourhood Plans should not be used as a mechanism to restrict development and constrain the delivery of strategic sites which can be brought forward through the SADPD process.

4.1.16 The situation in Devizes is exemplary of this point. Devizes is an area which was designated as a Market Town in the adopted WCS (January 2015). Core Policy 1 notes that:

"Market Towns have the potential for significant development that will increase the jobs and homes in each town in order to help sustain and where necessary enhance their services and facilities and promote better levels of self containment and viable sustainable communities."

4.1.17 The Core Strategy Inspector noted at Paragraph 32 of his Report on the WCS (December 2014) that future development may occur in a potentially significant manner in Market Towns through means such as allocations in the Sites DPD.

4.1.18 In the WCS, Devizes town is allocated an 'indicative' requirement of 2,010 dwellings in the plan period. It should be noted that this requirement has never been intended as a cap on further development but will provide flexibility for the Council to advance additional housing development in suitable locations if there are sustainable sites available. Paragraph 4.40 of the draft SADPD states:

"Indicative levels of housing for Market Towns are not a ceiling and a variance would not seem to present new or significant issues for local infrastructure and environmental capacity."

4.1.19 This suggests that there is potential for further development in Market Towns beyond 'indicative requirements' and reflects the adopted WCS.

4.1.20 As set out above Core Policy 2 of the WCS sets out that sites for development in Wiltshire can come forward through a site allocations DPD and neighbourhood planning.

4.1.21 The made Neighbourhood Plan for Devizes proposes housing numbers to meet the 2,010 'indicative' requirement, however it should be noted that this appears to be not shown as 'indicative' or 'minimum'. In addition the Neighbourhood Plan only allocates sites of up to 65 dwellings.

4.1.22 The Topic Paper 3 – Housing Land Supply (June 2017) which is part of the evidence base for the draft SADPD suggests at table 4.2 that there is a remaining indicative requirement in Devizes Town (part of the Devizes Community Area as a whole) of 0 dwellings. As set out before the requirement is indicative and this should not be seen as a sign that further housing in sustainable locations should be resisted in Devizes. The Inspector for the Coate Road appeal (Ref: 2206963) which related to a scheme for up to 350 dwellings on the edge of Devizes noted at Paragraph 231 of his decision:

"...it is worthwhile being in mind that the main aim of the NPPF is to facilitate sustainable development, not to prevent it. And by the same token, it seems to me that the DANP is about much more than just resisting development at the appeal site. Granting approval to the appeal scheme therefore need not stop the neighbourhood plan from promoting other sustainable developments as well, especially as the Devizes housing requirement is not meant to be a fixed ceiling."

4.1.23 The draft SADPD therefore provides an opportunity to allocate additional sites in suitable locations in Devizes/on the edge of Devizes such as strategic sites above 65 dwellings. The adopted WCS focus on 'indicative' and 'minimum' requirements provides the assurances for this approach.

4.1.24 The Examiner to the made Neighbourhood Plan for Devizes noted in his report (dated July 2014) at Paragraph 3.33 that 'there is also the possibility that site allocations, and indeed, the limits of development might be reviewed by Wiltshire Council through the forthcoming Site Allocations Development Plan Document'.

4.1.25 Overall the fact that a neighbourhood plan is 'made' should not result in the Council ruling out the allocation of sites in sustainable locations in the SADPD which accord with the principles of the Core Strategy as the Devizes housing requirement is by no means a fixed ceiling.

4.1.26 However, it is also important that development comes forward in a manner which is acceptable to the type of settlement. As market towns are ranked as settlements where substantial housing development is expected in the plan period, the Council should be considering additional sites as part of the SADPD process, if sustainable sites are available for development.

Deliverability of Sites in the East HMA

4.1.27 This section will consider the delivery of sites in the East HMA based on available evidence and the estimated delivery rates of the sites which contribute to the five year housing land supply.

Deliverability of sites in trajectory

4.1.28 To boost significantly the supply of housing (Paragraph 47 of the NPPF), LPA's are required to identify and update annually a supply of specific deliverable sites sufficient to provide five year's worth of housing against their housing requirements. Footnote 11 of Para 47 clarifies the meaning of deliverability as:

"achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable"

4.1.29 The Council's Topic Paper 3 - Five Year Land Supply Statement (June 2017) suggests Wiltshire are currently able to demonstrate a five year housing supply of 9.18 years (5% buffer) and (tbc) years (20% buffer).

4.1.30 As set out in Section 2 [Officer note: See Comment 3197] of these representations it is important that the Council updates its evidence base to include a housing trajectory to demonstrate how each site will be delivered.

4.1.31 The latest available trajectory is from the Housing Land Supply Statement (dated November 2016) which has an April 2016 base date. As there is nothing more recent relating to the latest housing land supply position in the evidence (which should have a April 2017 base date) for the draft SADPD we have considered the sites in the November 2016 trajectory. Should further evidence become available we reserve the right to provide further comment.

4.1.32 The November 2016 trajectory includes figures for the sites which are allocated in the made Neighbourhood Plan for Devizes and sets out the years they are expected to deliver housing development. It is important to note that a number of the figures in the trajectory are different from the allocated numbers in the Neighbourhood Plan. This suggests the Neighbourhood Plan may not deliver as expected. For instance Land at end of Hillworth Road (site 532) is shown to deliver 42 dwellings in the trajectory but is allocated for 47 dwellings in the Neighbourhood Plan.

4.1.33 In addition other sites allocated in the Neighbourhood Plan which are subject to planning applications may not deliver as expected. For instance a full application for 55 extra care dwellings on Land at Brofort Way, Bath Road (site 4003) was approved in December 2016 (ref:16/04371/FUL). However, the trajectory suggests this site is capable of delivering 60 dwellings in the plan period. This does not mean that another application will not be submitted for 5 dwellings in the future but it seems illogical for this to occur.

4.1.34 As set out above the requirement for development in Devizes is 'indicative' which provides flexibility for further sites to be allocated in the SADPD which will assist in providing further housing in sustainable locations. The further allocations will also assist in making up numbers for any sites which may not deliver as expected, particularly sites allocated in the made Neighbourhood Plan.

Delivery rates

4.1.35 In accordance with Paragraph 47 of the NPPF it is important that the Council considers whether there is a realistic prospect of the sites identified in the five year requirement coming forward at the expected rates, which in turn could impact on the number of sites which need to be allocated in the SADPD. Having reviewed the evidence, it is not clear whether the council have fully undertaken this exercise.

4.1.36 It is important that housing trajectories provide accurate delivery rates, especially for the larger sites which make a significant contribution to housing land supply. MMH raise concerns with the build out rates suggested in the housing trajectory with a significant number of dwellings anticipated to be delivered, particularly for major sites in Devizes, Ludgershall and Tidworth and Marlborough in both the 2016/2017 period and the current 2017/2018 period.

4.1.37 However, MMH raise more fundamental concerns with the delivery rates put forward on Land at Lay Wood south of Horton Road (site E13.1243) and Riverbourne Fields in Tidworth, Wiltshire (site S15.5084). These make a substantial contribution to the East HMA five year land supply.

4.1.38 The 2016 trajectory predicts that 80 dwellings will delivered in the 2019/2020 period for the Horton Road site. For the Riverbourne Fields site the trajectory predicts delivery of 83 in the 2019/2020 period and a substantial 156 dwellings in the 2018/2019 period. In later years for this site (2020/21 and 2021/22) the trajectory predicts that the site will only deliver 18 dwellings in each year. MMH consider that these figures are too high and would urge the Council to provide evidence justifying these significant rates as it is not clear this has been provided. As set out above the Council will firstly need to prepare a new trajectory for the 2017/2018 base year.

4.1.39 MMH also raise concerns with sites which are expected to deliver housing in the period 2017/2018 (i.e by end of March 2018) with some sites not delivering as quickly as expected and some which have not yet even started construction.

4.1.40 The trajectory suggests that a large proportion of the five year land supply of sites will come from large allocations. One of the largest allocations which is expected to deliver a significant quantum of housing in the next five years is 'Land West of Salisbury Road in Marlborough' (site E15.2026).

4.1.41 In this trajectory Wiltshire Council have indicated that 175 dwellings will be delivered on this site by 2021/22. An outline application for 175 dwellings was approved on July 2016 (LPA Ref: 15/02026/OUT). The trajectory suggests 55 dwellings will be delivered on this site in 2017/2018 (i.e. by end of March 2018). A reserved matters application for 168 dwellings on the same land was live at the time of writing, however, there is still likely to be a need to discharge relevant planning conditions. With this in mind it is unlikely whether the site will come forward as quickly as suggested. Based on a site visit to date we can confirm construction is yet to begin on this site with no obvious signs this will begin in the near future.

4.1.42 Based on this the SADPD provides an opportunity for the Council to allocate additional sites to provide flexibility in their housing supply and reflecting the status of sites which are not delivering as expected.

Conclusion

4.1.43 Overall whilst Wiltshire Council maintain that they can demonstrate a significant five year land supply in the East HMA, MMH consider that the level of provision is still too low, for the following reasons:

The flexible approach put forward in the adopted WCS encourages further sites to come forward in sustainable locations over and above the 'minimum' and 'indicative' requirements;

The housing requirements in made Neighbourhood Plans should not be considered as a cap on delivering housing requirements but the SADPP provides an opportunity for the Council to allocate further sites in sustainable locations in line with the adopted WCS;

There are doubts regarding the delivery of some sites in the East HMA and the rates at which they will be built out;

	<p>4.1.44 On this basis MMH consider further sites should be allocated in the SADPD. Unless a proactive approach to delivering sustainable development is adopted in the SADPD the Plan will fail to meet the NPPF objective of significantly boosting the supply of housing. On this basis the Plan cannot be considered sound as it is not justified or consistent with national policy.</p> <p>4.1.45 The next section [Officer note: Comment 3200] will consider the site specific policies in the draft SADPD for the East HMA which are intended to deliver the 170 'minimum requirement' for the remainder of the plan period.</p> <p>On this basis MMH consider further sites should be allocated in the SADPD. Unless a proactive approach to delivering sustainable development is adopted in the SADPD the Plan will fail to meet the NPPF objective of significantly boosting the supply of housing. On this basis the Plan cannot be considered sound as it is not justified or consistent with national policy.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>As set out in the attached representations a number of issues are raised regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.</p>

Comment ID:	3200	Consultee Mctaggart & Mickel Person ID: 861027	Agent Mr Jonathan Chick Planner Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1		Justified Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		Site Allocations in the East HMA 5.1.1 This section considers the policies proposed in the draft SADPD for the East HMA and whether the sites proposed are suitable for residential development, and thus whether the plan is sound. 5.1.2 As set out in the previous section [Officer note: as set out in Comment 3199], Figure 5 [Officer note: it is assumed this refers to Table 4.1] of the draft SADPD suggests that 3,497 completions have taken place in the East HMA between 2006-2017 with 2,273 developable commitments available, leaving only a requirement of 170 dwellings to be delivered in the remainder of the plan period. 5.1.3 Policy H1 of the draft SADPD proposes land allocated for residential development on a number of sites in the East HMA. 5.1.4 One of the chosen sites is Land at Empress Way, Ludgershall (Tidworth Community Area) which is allocated a total of 270 dwellings under Policy H1.1 of the draft SADPD. Paragraph 5.17 suggests that 109 dwellings have been approved with planning permission under LPA Ref E/2013/0234/OUT and that a further 160 can be developed on land next to the site. 5.1.5 The three other sites are allocated for housing in Market Lavington (Devizes Community Area) under the following references: H1.2 (Underhill Nursery) H1.3 (Southcliffe) H1.4 (East of Lavington School) 5.1.6 We have considered each of the sites in turn below: Land at Empress Way, Ludgershall(PolicyH1.1) 5.1.7 We note that an outline application for 109 dwellings was approved on this site on 15thJune2015under LPA Reference E/2013/0234/OUT. 5.1.8 We note that a further outline application for 269 dwellings (including land covered by the previous application) was refused on 15th February 2017 under LPA reference 16/10907/OUT. One of the reasons for its refusal was because of the sites location on agricultural land with an Agricultural Land classification of 'grade 3a'. According to the National Planning Policy Framework land in grades 1, 2 and 3a is the best and most versatile. 5.1.9 In addition whilst not specified in the decision notice for this application, the Council's Sustainability Appraisal (SA) which underpins policies in the draft SADPD suggests that development on this site is likely to have moderate adverse effects on the Sustainability objective to use and manage water resources in a sustainable manner (objective 3) and the objective to protect and enhance all biodiversity and geological features and avoid irreversible losses. 5.1.10 This suggests there are constraints which could prevent development on the site and potentially affect the developable area. H1.2 – H1.4 5.1.11 The three Market Lavington sites proposed as allocations can be summarised as follows: H1.2: Underhill Nursery – approximately 2.6 hectares of land on the edge of the settlement allocated for approximately 50 dwellings; H1.3: Southcliffe – approximately 0.9 hectares of land on the edge of the settlement allocated for approximately 15 dwellings;			

H1.4: East of Lavington School – approximately 0.6 hectares of land allocated on the edge of the settlement for approximately 15 dwellings.

5.1.12 Market Lavington was designated as Local Service Centre in Core Policy 2 of the adopted WCS (3rd out of 5 in the settlement hierarchy). Core Policy 2 states:
 “Local Service Centres will provide for modest levels of development in order to safeguard their role and to deliver affordable housing”

5.1.13 Paragraph 5.23 of the draft SADPD notes that Market Lavington is an area affected by flooding, it states:
 “Surface water management and flood risk: parts of Market Lavington are affected by surface water flooding during extreme weather events. In part this is due to the village’s proximity to the chalk escarpment associated with the Salisbury Plain”

5.1.14 Furthermore, all three sites are shown in the SA to have a moderate adverse effect on the objective to use and manage water resources in a sustainable manner (objective 3) and to minimise impacts on climate change through reducing vulnerability to future climate change effects. We have concerns regarding the allocation of sites located in areas at risk to flooding which should be discounted unless it can be demonstrated that there are no other reasonable options available.

5.1.15 Paragraph 100 of the NPPF is clear that:
 “Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.”

5.1.16 Paragraph 101 goes on to clarify that ‘The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available site appropriate for the proposed development in areas with a lower probability of flooding.’

5.1.17 Whilst in principle it may be considered appropriate to locate some development in lower tiered settlements such as Local Service Centres to safeguard their role (in accordance with Core Policy 1 of the adopted WCS) and deliver housing (in accordance with Core Policy 2), the significant risk of flooding now and in the future, together with the implications of climate change suggest that a more appropriate strategy which seeks to avoid areas of flood risk should be considered preferable. This does not mean that development adjacent to Market Lavington is not acceptable. However, in appropriate cases more sustainable settlements should be identified for increasing levels of growth as an alternative to building in areas at risk to flooding. The fact that the WCS proposes ‘indicative’ requirements provides flexibility to locate housing in more sustainable locations should this be required.

5.1.18 As set out in the previous section [Comment 3199] Devizes is identified as a Market Town which is expected to accommodate significant growth in the plan period.

5.1.19 MMH consider that locating further growth in Devizes should be considered as a reasonable alternative to sites located in floodplains. It is important to note that the SA has not considered sites outside of Market Lavington.

Conclusion

5.1.20 Based on the above MMH consider the Plan is not sound as it has not considered all reasonable alternatives and has based its strategy on allocating sites with doubts regarding their suitability without consideration of other sites which are less constrained and located in more sustainable locations.

5.1.21 For the Plan to be considered sound further sites should be considered in sustainable locations including in larger settlements where substantial development is expected.

5.1.21 A particular emphasis should be given to sites which have already been confirmed as acceptable, are not technically constrained and are in sustainable locations. Land off Coate Road, Devizes is a site which meets this criteria. This site is considered further in the next section.
 [The details of the site are considered in Comment 3196]

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to

As set out in the attached representations a number of issues are raised regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.

participate at the oral part of the examination?	
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Comment ID:	3201	Consultee Mctaggart & Mickel	Agent Mr Jonathan Chick Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 861027	Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.1		Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5.1.7 We note that an outline application for 109 dwellings was approved on this site on 15th June 2015 under LPA Reference E/2013/0234/OUT.</p> <p>5.1.8 We note that a further outline application for 269 dwellings (including land covered by the previous application) was refused on 15th February 2017 under LPA reference 16/10907/OUT. One of the reasons for its refusal was because of the sites location on agricultural land with an Agricultural Land classification of 'grade 3a'. According to the National Planning Policy Framework land in grades 1, 2 and 3a is the best and most versatile.</p> <p>5.1.9 In addition whilst not specified in the decision notice for this application, the Council's Sustainability Appraisal (SA) which underpins policies in the draft SADPD suggests that development on this site is likely to have moderate adverse effects on the Sustainability objective to use and manage water resources in a sustainable manner (objective 3) and the objective to protect and enhance all biodiversity and geological features and avoid irreversible losses.</p> <p>5.1.10 This suggests there are constraints which could prevent development on the site and potentially affect the developable area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	As set out in the attached representations a number of issues are raised regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.				

Comment ID:	3202	Consultee Mctaggart & Mickel Person ID: 861027	Agent Mr Jonathan Chick Planner Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is legally compliant?		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Justified Consistent with national policy		Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.1				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>5.1.1 1 The three Market Lavington sites proposed as allocations can be summarised as follows: H1.2: Underhill Nursery – approximately 2.6 hectares of land on the edge of the settlement allocated for approximately 50 dwellings; H1.3: Southcliffe – approximately 0.9 hectares of land on the edge of the settlement allocated for approximately 15 dwellings; H1.4: East of Lavongton School – approximately 0.6 hectares of land allocated on the edge of the settlement for approximately 15 dwellings.</p> <p>5.1.12 Market Lavington was designated as Local Service Centre in Core Policy 2 of the adopted WCS (3rd out of 5 in the settlement hierarchy). Core Policy 2 states: “Local Service Centres will provide for modest levels of development in order to safeguard their role and to deliver affordable housing”</p> <p>5.1.13 Paragraph 5.23 of the draft SADPD notes that Market Lavington is an area affected by flooding, it states: “Surface water management and flood risk: parts of Market Lavington are affected by surface water flooding during extreme weather events. In part this is due to the village’s proximity to the chalk escarpment associated with the Salisbury Plain”</p> <p>5.1.14 Furthermore, all three sites are shown in the SA to have a moderate adverse effect on the objective to use and manage water resources in a sustainable manner (objective 3) and to minimise impacts on climate change through reducing vulnerability to future climate change effects. We have concerns regarding the allocation of sites located in areas at risk to flooding which should be discounted unless it can be demonstrated that there are no other reasonable options available.</p> <p>5.1.15 Paragraph 100 of the NPPF is clear that: “Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.”</p> <p>5.1.16 Paragraph 101 goes on to clarify that ‘The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available site appropriate for the proposed development in areas with a lower probability of flooding.’</p> <p>5.1.17 Whilst in principle it may be considered appropriate to locate some development in lower tiered settlements such as Local Service Centres to safeguard their role (in accordance with Core Policy 1 of the adopted WCS) and deliver housing (in accordance with Core Policy 2), the significant risk of flooding now and in the future, together with the implications of climate change suggest that a more appropriate strategy which seeks to avoid areas of flood risk should be considered preferable. This does not mean that development adjacent to Market Lavington is not acceptable. However, in appropriate cases more sustainable settlements should be identified for increasing levels of growth as an alternative to building in areas at risk to flooding. The fact that the WCS proposes ‘indicative’ requirements provides flexibility to locate housing in more sustainable locations should this be required.</p>				

	<p>5.1.18 As set out in the previous section Devizes is identified as a Market Town which is expected to accommodate significant growth in the plan period.</p> <p>5.1.19 MMH consider that locating further growth in Devizes should be considered as a reasonable alternative to sites located in floodplains. It is important to note that the SA has not considered sites outside of Market Lavington.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>As set out in the attached representations a number of issues are raised regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.</p>

Comment ID:	3203	Consultee Mctaggart & Mickel Person ID: 861027	Agent Mr Jonathan Chick Planner Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H1.3				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5.1.1 1 The three Market Lavington sites proposed as allocations can be summarised as follows: H1.2: Underhill Nursery – approximately 2.6 hectares of land on the edge of the settlement allocated for approximately 50 dwellings; H1.3: Southcliffe – approximately 0.9 hectares of land on the edge of the settlement allocated for approximately 15 dwellings; H1.4: East of Lavongton School – approximately 0.6 hectares of land allocated on the edge of the settlement for approximately 15 dwellings.</p> <p>5.1.12 Market Lavington was designated as Local Service Centre in Core Policy 2 of the adopted WCS (3rd out of 5 in the settlement hierarchy). Core Policy 2 states: “Local Service Centres will provide for modest levels of development in order to safeguard their role and to deliver affordable housing”</p> <p>5.1.13 Paragraph 5.23 of the draft SADPD notes that Market Lavington is an area affected by flooding, it states: “Surface water management and flood risk: parts of Market Lavington are affected by surface water flooding during extreme weather events. In part this is due to the village’s proximity to the chalk escarpment associated with the Salisbury Plain”</p> <p>5.1.14 Furthermore, all three sites are shown in the SA to have a moderate adverse effect on the objective to use and manage water resources in a sustainable manner (objective 3) and to minimise impacts on climate change through reducing vulnerability to future climate change effects. We have concerns regarding the allocation of sites located in areas at risk to flooding which should be discounted unless it can be demonstrated that there are no other reasonable options available.</p> <p>5.1.15 Paragraph 100 of the NPPF is clear that: “Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.”</p> <p>5.1.16 Paragraph 101 goes on to clarify that ‘The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available site appropriate for the proposed development in areas with a lower probability of flooding.’</p> <p>5.1.17 Whilst in principle it may be considered appropriate to locate some development in lower tiered settlements such as Local Service Centres to safeguard their role (in accordance with Core Policy 1 of the adopted WCS) and deliver housing (in accordance with Core Policy 2), the significant risk of flooding now and in the future, together with the implications of climate change suggest that a more appropriate strategy which seeks to avoid areas of flood risk should be considered preferable. This does not mean that development adjacent to Market Lavington is not acceptable. However, in appropriate cases more sustainable settlements should be identified for increasing levels of growth as an alternative to building in areas at risk to flooding. The fact that the WCS proposes ‘indicative’ requirements provides flexibility to locate housing in more sustainable locations should this be required.</p>				

	<p>5.1.18 As set out in the previous section Devizes is identified as a Market Town which is expected to accommodate significant growth in the plan period.</p> <p>5.1.19 MMH consider that locating further growth in Devizes should be considered as a reasonable alternative to sites located in floodplains. It is important to note that the SA has not considered sites outside of Market Lavington.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>As set out in the attached representations a number of issues are raised regarding soundness of the plan. Therefore, we consider it will be necessary to participate at the oral part of the examination to ensure we have the opportunity to speak on behalf of our client.</p>

Comment ID:	3204	Consultee Mctaggart & Mickel Person ID: 861027	Agent Mr Jonathan Chick Planner Walsingham Planning Person ID: 1136403	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H1.4				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5.1.1 1 The three Market Lavington sites proposed as allocations can be summarised as follows: H1.2: Underhill Nursery – approximately 2.6 hectares of land on the edge of the settlement allocated for approximately 50 dwellings; H1.3: Southcliffe – approximately 0.9 hectares of land on the edge of the settlement allocated for approximately 15 dwellings; H1.4: East of Lavongton School – approximately 0.6 hectares of land allocated on the edge of the settlement for approximately 15 dwellings.</p> <p>5.1.12 Market Lavington was designated as Local Service Centre in Core Policy 2 of the adopted WCS (3rd out of 5 in the settlement hierarchy). Core Policy 2 states: “Local Service Centres will provide for modest levels of development in order to safeguard their role and to deliver affordable housing”</p> <p>5.1.13 Paragraph 5.23 of the draft SADPD notes that Market Lavington is an area affected by flooding, it states: “Surface water management and flood risk: parts of Market Lavington are affected by surface water flooding during extreme weather events. In part this is due to the village’s proximity to the chalk escarpment associated with the Salisbury Plain”</p> <p>5.1.14 Furthermore, all three sites are shown in the SA to have a moderate adverse effect on the objective to use and manage water resources in a sustainable manner (objective 3) and to minimise impacts on climate change through reducing vulnerability to future climate change effects. We have concerns regarding the allocation of sites located in areas at risk to flooding which should be discounted unless it can be demonstrated that there are no other reasonable options available.</p> <p>5.1.15 Paragraph 100 of the NPPF is clear that: “Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.”</p> <p>5.1.16 Paragraph 101 goes on to clarify that ‘The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available site appropriate for the proposed development in areas with a lower probability of flooding.’</p> <p>5.1.17 Whilst in principle it may be considered appropriate to locate some development in lower tiered settlements such as Local Service Centres to safeguard their role (in accordance with Core Policy 1 of the adopted WCS) and deliver housing (in accordance with Core Policy 2), the significant risk of flooding now and in the future, together with the implications of climate change suggest that a more appropriate strategy which seeks to avoid areas of flood risk should be considered preferable. This does not mean that development adjacent to Market Lavington is not acceptable. However, in appropriate cases more sustainable settlements should be identified for increasing levels of growth as an alternative to building in areas at risk to flooding. The fact that the WCS proposes ‘indicative’ requirements provides flexibility to locate housing in more sustainable locations should this be required.</p>				

	<p>5.1.18 As set out in the previous section Devizes is identified as a Market Town which is expected to accommodate significant growth in the plan period.</p> <p>5.1.19 MMH consider that locating further growth in Devizes should be considered as a reasonable alternative to sites located in floodplains. It is important to note that the SA has not considered sites outside of Market Lavington.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3205	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Marlborough Community Area		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>See detailed rep attached on housing land supply and OAN.</p> <p>The Draft Housing Site Allocations Plan will not provide for the OAN in any of the HMAs as required by national policy. Furthermore, the allocations proposed do not accord with the adopted spatial distribution of the Core Strategy.</p> <p>In order to address this, it will be necessary to identify additional allocations in those sub-areas which have a significant shortfall against the approximate sub-area housing requirements (which themselves do not meet the OAN). This will necessitate additional allocations in several sub-areas including Marlborough CA remainder and Trowbridge Town.</p> <p>The suggested change to Policy H1 is to include the following sites at Large Villages in the Marlborough Community Area as allocations to address the identified unmet housing requirement in the Community Area Remainder of 34 dwellings.</p> <p>Land at Lottage Farm, Lottage Road, Aldbourne – See Appendix 1 (SHLAA ref 3485)</p> <p>Land at Russley Green, Baydon – See Appendix 2 (SHLAA ref 3188)</p> <p>It is also requested that the detailed housing land supply evidence that sits behind the publication of the Wiltshire Housing Sites Allocation Plan be published to enable further scrutiny of the Council's five year housing land supply position for each Housing Market Area and to ensure transparency in the plan making process.</p>			
Attached files (Please see Objective)		4748732			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To be able to make further representation to the Inspector on behalf of my client with regard to the matters raised in this representation and to be able to respond to any further additional evidence that the Council may publish in advance of the Hearings into the Housing Sites Allocation Plan document.			

Comment ID:	3206	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>See attached rep for detailed comments on policy H1. It is submitted that Policy 1of the WHSAP is not sound as;</p> <ol style="list-style-type: none"> 1. It fails to plan positively in accordance with the paragraph 17 of the NPPF to identify sites to meet the Marlborough Remainder Housing need identified in the WCS and instead relies on existing committed supply within the HMA, but outside the Marlborough Community Area remainder, to meet that locally specific minimum need. Paragraph 17 of the NPPF states that, 'Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth'. 2. The WHSAP also fails to allocate sites in accordance with spatial strategy of the WCS, as in this instance, after the Market Town of Marlborough, (which had a large strategic allocation adopted through the WCS (Core Policy 14 Land to West of Salisbury Road – 220 dwellings)), the next tier of settlement to accommodate housing growth to meet housing need are the four Large Villages described above. 3. The WHSAP is inconsistent as it allocates sites in Large Villages in the North and West Housing Market Area but does not adopt the same approach for the East Wiltshire HMA. 4. The WHSAP relies on the delivery of housing to meet local need at Large Villages through Neighbourhood Plans, however of the four Large Villages in the Malborough Community Area only one has a Neighbourhood area identified. Given the WHSAP is in the process of being prepared now it is incumbent upon the Council to identify sites for development in the Marlborough Community Area Large Villages in order to provide certainty over housing delivery for the plan period in the absence of substantive neighbourhood plan preparation across the four large villages in the Community Area. 5. The Sustainability Appraisal (June 2017) states that there may be cumulative effects as a result of Policy H1 with land identified for housing development at Drummond Park (MSA) Depot, Ludgershall in the Core Strategy (Core Policy 26 for 475 dwellings). 6. Potential development sites in the Marlborough Community Area, including sites submitted to the Wiltshire Strategic Housing Land Availability Assessment process, have not been assessed in the Sustainability Appraisal (June 2017) as the WHSAP states that development in the Large Villages in the East Wiltshire HMA should come forward through Neighbourhood Plans, not through allocations in the WHSAP. There is therefore no way of comparing the relative sustainability credentials of our client's site against those sites allocated at the Market Towns in Policy H1. <p>See attached rep for detailed changes to policy H1 and supporting text. The suggested change to Policy H1 is to include the following sites at Large Villages in the Marlborough Community Area as allocations to address the identified unmet housing requirement in the Community Area Remainder of 34 dwellings. Land at Lottage Farm, Lottage Road, Aldbourne – See Appendix 1 (SHLAA ref 3485) Land at Russley Green, Baydon – See Appendix 2 (SHLAA ref 3188)</p>				

Attached files (Please see Objective)	4748732
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Marlborough Community Area remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence.

Comment ID:	3207	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1		Effective	
		<p>Housing Land Supply evidence for the Wiltshire Sites Allocation Plan is provided in Topic Paper 3 Housing Land Supply (June 2017) which will be informed by the Wiltshire Housing Land Supply Statement Update (March 2017). The published Topic Paper 3 data does not provide the detailed sources of supply across the HMA on a site by site basis and my client reserves the right to comment on this in the future as and when it is published. However, Table 3.1 of Topic Paper 3 points to the residual requirements of each Housing Market Area and each community area for the remainder of the plan period up to 2026. It is noted that Footnote 7 clearly states that the residual indicative requirement for 2017 has been estimated and paragraphs 3.10 - 3.12 apply. Table 3.1 of Topic Paper 3 states that a residual requirement of 170 dwellings exists for the whole East Wiltshire Housing Market Area, more specifically a residual requirement of 51 dwellings is identified for the Marlborough Community Area (of which 34 dwellings are in the Community Area remainder). Existing Neighbourhood Plan Allocations Is submitted however that delivery from the Neighbourhood Plans in the HMA is questionable. The Housing Land Supply Update Statement (March 2017) identifies delivery of 142 units from allocations in the Devizes Neighbourhood Plan at the end of the plan period in the 2025/2026 monitoring year. It is contended that if these allocations were truly 'deliverable' in the five-year housing land supply sense then they would be showing in the Council's trajectory as delivering earlier in the plan period. The local authority must have some considerable doubt over the delivery of the Devizes Neighbourhood Plan allocations for them to be shown as delivering so late in the plan period. Indeed the rigour that is applied to the examination of neighbourhood plan allocations is less than the rigour applied to Local Plan allocations and therefore there is some doubt over whether these particular neighbourhood plan allocations will indeed contribute to housing land supply by 2026. The same argument can be made for the planned supply of dwellings through the Pewsey Neighbourhood Plan for the HMA housing land supply total, although these units are shown as delivering earlier in the plan period during 2021/22 and 2022/23. When added together the allocations from Devizes and Pewsey total some 200 dwellings, the delivery of which in the plan period is not at all certain. It is submitted therefore that the deliverable total for the East Wiltshire Housing Market Area for the plan period should be reduced by at least 142 units to account for the uncertain source of supply from Devizes Neighbourhood Plan but this figure could be as high as 200 if the allocations from the Pewsey Neighbourhood Plan are also included. This in turn would increase the residual indicative requirement for the East Wiltshire Housing Market Area by at least 142 dwellings from 170 to 312 dwellings, or more pessimistically from 170 to 370 dwellings. Table 3.3 of Topic Paper 3 indicates that the East Wiltshire HMA has 8.47 years of housing land supply, however closer inspection of the Housing Land Supply Update (March 2017) reveals an optimistic approach to housing delivery for the WCS Strategic Allocation at Land West of Salisbury in Marlborough. While outline planning permission has been granted at the site the reserved matters application is still to be</p>			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.					

	<p>determined therefore the delivery of 55 dwellings from the site in the 2017/18 monitoring year is unlikely to be achieved. While access was approved as part of the outline application all ground works still need to be undertaken at the site before any dwellings can commence construction.</p> <p>It is more likely that a phased delivery will take place at the site with, for example, 25 dwellings delivering in the first delivery year, which realistically may be 2019/20, with increased annual delivery numbers thereafter. This would reduce deliverable capacity in the five-year supply by 50 dwellings in Marlborough Community Area.</p> <ol style="list-style-type: none"> 1. That the housing land supply for the East Wiltshire Housing Market Area be discounted by the capacity of allocations identified in the Devizes Neighbourhood Plan where the Council have concerns over the delivery of the made allocations in the plan period before 2026. 2. That careful consideration be given to the estimated delivery trajectory of dwellings from allocations in the Pewsey Neighbourhood Plan 3. That the anticipated housing delivery from the WCS strategic allocation at Land West of Salisbury Road Marlborough be amended to reflect the fact that there are currently no starts on dwelling construction at the site, and the delivery trajectory be amended accordingly to reflect this. 4. Once these matters have been taken into consideration the Indicative Remainder for both the East Wiltshire Housing Market Area and the Marlborough Community Area will require amendment where they appear in the WHSAP.
Attached files (Please see Objective)	4748732
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Marlborough Community Area remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence.

Comment ID:	3208	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		1.1 and 1.3		Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocations Plan (June 2017) (WHSAP) states at Paragraph 1.1 that one of its purposes is to: 'Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages;'</p> <p>The methodology for the review of settlement boundaries is described in Topic Paper 1 – Settlement Boundary Review Methodology (June 2017) (SBRM).</p> <p>The outcomes of the settlement boundary review are reported in each Community Area Topic Paper. (It is noted that the Chippenham Settlement boundary was reviewed and adopted through the Chippenham Site Allocations Plan.)</p> <p>The SBRM states at paragraph 1.2 that the Wiltshire Core Strategy (2015) (WCS) did not review settlement boundaries but instead carried forward the settlement boundaries adopted in each of the former local district adopted Local Plans, prior to the County becoming an unitary authority.</p> <p>The Policy of the WCS is that sites outside a settlement boundary will generally be considered unsuitable for development, Core Policy 2 states; 'Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans.'</p> <p>The WHSAP identifies at Table 4.9 that within the Marlborough Community Area there is a minus 14.1% difference between the indicative dwelling requirement 2006-2026 and the sum of completions and developable commitments 2017-2026. The Marlborough Community Area Topic Paper (MCATP) states an indicative residual requirement for 34 additional dwellings to deliver in the plan period in the Marlborough Community Area Remainder, however the SBRM does not include sites with the potential for the delivery of dwellings, including site allocations or extant planning permissions within its revised settlement boundaries.</p> <p>It is noted that the WCS provides the opportunity in the last sentence of paragraph 4.13 for neighbourhood plans to review settlement boundaries;</p> <p>'It will also be the prerogative of the community to review settlement boundaries through a neighbourhood plan.'</p> <p>It is therefore unclear how the additional indicative requirement of 34 dwellings will be provided in the Marlborough Community Area as the settlement boundary reviews of Marlborough and its associated four large villages do not include sites for the delivery of this quantum of development. It is unlikely that such a quantum of development would come forward in the plan period through windfall development within the settlement boundaries of the Marlborough Community Area.</p> <p>Aldbourn Large Village</p> <p>The settlement boundary for Aldbourn is extended to the north by the settlement review to include land parcels in I3; J2 and J3. These proposed amendments are described in Table A.2 on page 19 of the MCATP as;</p> <p>'Extension of boundary to take into account built residential development that is physically related to the settlement'.</p>				

	<p>The proposed extension of the settlement boundary to the north of the village of Aldbourne is supported by our client. Land at Lottage Farm is situated at map reference J3 and J2 adjacent to both the north of the existing settlement boundary and the proposed extension to the settlement boundary which would be situated to the west of the site. Appendix 1 clearly shows the location of our clients site. It is submitted that the settlement boundaries in Marlborough Community Area should be amended to allow for the indicative residual requirement for the Community Area to be met in the plan period, to allow the Community Area Remainder to be delivered in accordance with Core Policy 2 of the WCS.</p> <p>Inclusion of our client's sites at Lottage Farm Aldbourne and Land at Russley Green, Baydon as identified in Appendices 1 and 2, within the settlement boundaries of each of the Large Villages of Aldbourne and Baydon would ensure that sufficient land was identified within settlements to allow for the Marlborough Community Area Remainder to be delivered in a way that complies with the existing polices of the WCS and emerging WHSAP.</p>
Attached files (Please see Objective)	4750534 / 4748732
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Marlborough Community Area remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence, and to argue the case for their inclusion within Settlement Boundary amendments.

Comment ID:	3209	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The Wiltshire Housing Site Allocations Plan (June 2017) (WHSAP) states at Paragraph 1.1 that one of its purposes is to: 'Revise, where necessary, settlement boundaries in relation to the Principal Settlements of Salisbury and Trowbridge, Market Towns, Local Service Centres and Large Villages;'</p> <p>The methodology for the review of settlement boundaries is described in Topic Paper 1 – Settlement Boundary Review Methodology (June 2017) (SBRM).</p> <p>The outcomes of the settlement boundary review are reported in each Community Area Topic Paper. (It is noted that the Chippenham Settlement boundary was reviewed and adopted through the Chippenham Site Allocations Plan.)</p> <p>The SBRM states at paragraph 1.2 that the Wiltshire Core Strategy (2015) (WCS) did not review settlement boundaries but instead carried forward the settlement boundaries adopted in each of the former local district adopted Local Plans, prior to the County becoming an unitary authority.</p> <p>The Policy of the WCS is that sites outside a settlement boundary will generally be considered unsuitable for development, Core Policy 2 states; 'Other than in circumstances as permitted by other policies within this plan, identified in paragraph 4.25, development will not be permitted outside the limits of development, as defined on the policies map. The limits of development may only be altered through the identification of sites for development through subsequent Site Allocations Development Plan Documents and neighbourhood plans.'</p> <p>The WHSAP identifies at Table 4.9 that within the Marlborough Community Area there is a minus 14.1% difference between the indicative dwelling requirement 2006-2026 and the sum of completions and developable commitments 2017-2026. The Marlborough Community Area Topic Paper (MCATP) states an indicative residual requirement for 34 additional dwellings to deliver in the plan period in the Marlborough Community Area Remainder, however the SBRM does not include sites with the potential for the delivery of dwellings, including site allocations or extant planning permissions within its revised settlement boundaries.</p> <p>It is noted that the WCS provides the opportunity in the last sentence of paragraph 4.13 for neighbourhood plans to review settlement boundaries;</p> <p>'It will also be the prerogative of the community to review settlement boundaries through a neighbourhood plan.'</p> <p>It is therefore unclear how the additional indicative requirement of 34 dwellings will be provided in the Marlborough Community Area as the settlement boundary reviews of Marlborough and its associated four large villages do not include sites for the delivery of this quantum of development. It is unlikely that such a quantum of development would come forward in the plan period through windfall development within the settlement boundaries of the Marlborough Community Area.</p> <p>Baydon Large Village</p> <p>The settlement boundary for Baydon is extended to the north east by the settlement review to include land in parcel H5. The proposed amendment is described in Table A.3 on page 21 of the MCATP as;</p> <p>'Extension to include built residential development that is physically related to the settlement' (west)</p>				

	<p>'Amendment to boundary to follow but not include clearly defined physical feature – the road' (east)</p> <p>The proposed extension of the settlement boundary to the north west of the village of Baydon is supported by our client where it includes development that is physically related to the settlement, but it is not supported where the boundary is amended to follow the built form of the road and excludes a triangular parcel of land that is in the control of our client. This parcel of land is currently overgrown but could be bought forward for use as an informal village green in conjunction with the development of Russley Green site.</p> <p>Our clients land at Baydon is situated at map reference H5 adjacent to the existing and proposed settlement boundary to the south of the parcel and the proposed extension to the settlement boundary which would be situated to the east of the site. Appendix 2 clearly shows the location of our client's site in Baydon.</p> <p>It is not likely that the Baydon Village boundary would be further reviewed in the near future by a Neighbourhood Plan as minutes of the Parish Council meeting dated 9th January 2017 state that the Parish Council, 'did not have the capacity at the moment to tackle it'.</p> <p>It is submitted that the settlement boundaries in Marlborough Community Area should be amended to allow for the indicative residual requirement for the Community Area to be met in the plan period, to allow the Community Area Remainder to be delivered in accordance with Core Policy 2 of the WCS.</p> <p>Inclusion of our client's sites at Lottage Farm Aldbourne and Land at Russley Green, Baydon as identified in Appendices 1 and 2, within the settlement boundaries of each of the Large Villages of Aldbourne and Baydon would ensure that sufficient land was identified within settlements to allow for the Marlborough Community Area Remainder to be delivered in a way that complies with the existing policies of the WCS and emerging WHSAP.</p>
<p>Attached files (Please see Objective)</p>	<p>4750573 / 4748732</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Marlborough Community Area remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence, and to argue the case for their inclusion within Settlement Boundary amendments.</p>

Comment ID:	3210	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1		Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	See rep attached for detailed comments on land at Lottage Farm, Aldbourne as an omission site That the site at Lottage Lane, Aldbourne be allocated in Policy H1 as a sustainable location for the residential development of up to 25 dwellings to help meet the identified Marlborough Community Remainder Area Indicative Residual Requirement for the plan period up to 2036.				
Attached files (Please see Objective)	4750578 / 4748732 / 4750580				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Marlborough Community Area Remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence.				

Comment ID:	3211	Consultee Mr Conor Lee Hannick Homes & Developments Ltd	Agent Mrs Louise Follett Principle Planner	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 863519	Pegasus Group Person ID: 1128217	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	See rep attached for detailed comments on land at Russley Greene Farm, Baydon as an omission site That our client's site at Russley Green, Baydon be allocated in Policy H1 as a sustainable location for the residential development of up to 15 dwellings to help meet the identified Marlborough Community Remainder Area Indicative Residual Requirement for the plan period up to 2036.				
Attached files (Please see Objective)	4750583 / 4750581 / 4748732				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To be able to explain to the Inspector the relative merits of my client's sites for the delivery of housing in accordance with the Council's published spatial strategy and to meet the local housing needs of the Marlborough Community Area remainder as identified in the Draft Wiltshire Housing Site Allocations Plan (June 2017) and its supporting evidence.				

Comment ID:	3212	Consultee Mr Chris Dodds Associate Director	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1138508	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1. Introduction</p> <p>1.1 This representation is submitted to the draft Wiltshire Housing Site Allocations Pre Submission Plan (June 2017) to promote land off Calne Road, Lyneham.</p> <p>1.2 The site is approximately 7.12 ha and is located on the south western edge of Lyneham, comprising two flat fields accessed off the A3102 (Calne Road) which forms the main road running through Lyneham, including to its centre which is located to the north.</p> <p>1.3 To the north west of the site is MOD Lyneham albeit a number of large military hangars bound the north and north eastern part of the site. A field bounds the site immediately to the south, with a poultry farm further to the south of that. Fields also bound the site immediately to the south east, with Freegrove Farm further to the east of those. Immediately to the west, the site is bound by Calne Road with housing on the other side of that. Further to the west is MOD Lyneham.</p> <p>1.4 The site is located adjacent to Lyneham's existing built form and is considered to be suitable, available and achievable for residential development. It is anticipated that the site can deliver much needed homes for Wiltshire within 5 years.</p> <p>1.5 Early investigations into various technical matters suggest that there would be no significant adverse impacts as a result of residential development of this site. Any potential adverse impacts are minor and can be readily mitigated through the development management process.</p> <p>Site Location: Land off Calne Road, Lyneham [refer to site location plan in attached full representation]</p> <p>3.11 With the above in mind, the site off Calne Road, Lyneham should be allocated for residential development. It represents a logical extension to Lyneham and forms a sustainable development proposal that can contribute towards Wiltshire's and Lyneham's housing needs going forward. Any potential adverse impacts are minor and can be readily mitigated through the development management process.</p>				
Attached files (Please see Objective)	4749570				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Planning Prospects represent the landowner in promoting land off Calne Road, Lyneham for residential development and have detailed comments with regard to the delivery of that site and with respect to the approach to be taken for the emerging Housing Site Allocations Plan generally.				

Comment ID:	3213	Consultee Mr Chris Dodds Associate Director	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1138508	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>2. Development Plan Context: Meeting Housing Needs</p> <p>2.1 Lyneham is designated as a 'Large Village' and has a wide range of facilities including those associated with the growth of MOD Lyneham (formerly RAF Lyneham) throughout the previous century.</p> <p>2.2 The adopted Core Strategy, requires Wiltshire to accommodate at least 42,000 additional dwellings over the period 2006 to 2026, but this represents a minimum requirement and not a capped target. The Inspector who conducted the Core Strategy's Examination in Public (EiP) made clear that the balance of evidence suggested that the objectively assessed need for the three Wiltshire Housing Market Areas (HMAs) was somewhere in the region of 44,000 new homes over the Plan period (Inspector's Report - paragraph 78).</p> <p>2.3 The Core Strategy Inspector also expressed a clear understanding that Wiltshire was obliged to meet the full Objectively Assessed Need (OAN) through the Allocations Plan, Neighbourhood Plans and Chippenham Site Allocations Plan (Inspector's Report - paragraph) and where the Council intended to produce a new Strategic Housing Market Assessment (SHMA) in 2016 which may revise the OAN again (Inspector's Report - paragraph 81), the Core Strategy figure of 42,000 must not be seen as a ceiling in the delivery of housing for the purposes of identifying an appropriate scale of housing site allocations.</p> <p>2.4 Moreover, the Council is required by the National Planning Policy Framework (NPPF) to use its evidence base to ensure that its Local Plan meets the full OAN for market and affordable housing in the HMA. The true full OAN for Wiltshire is likely to be subject of further scrutiny and debate as the Allocations Plan progresses.</p> <p>2.5 It is also becoming increasingly likely that as a result of the publication of the Government's Housing White Paper (February 2017) and subsequent consultation (September 2017) the method of how the Government expects the housing needs of local authorities to be assessed through their local plan making will be subject to change prior to the emerging Housing Allocations Plan being examined. It is expected that a standardised approach (a draft of which is subject to consultation between September and November 2017) will be applicable to local plans that are submitted for examination after 31st March 2018, making it relevant here. the consultation is a draft itself and therefore subject to debate and change but it nonetheless continues to suggest that the OAN figure for Wiltshire is higher than that provided in the adopted Core Strategy.</p> <p>3. Emerging Housing Site Allocations Pre-Submission Draft</p> <p>3.1 In the case of Wiltshire, the OAN is known to be higher than the minimum requirement set out in the adopted Core Strategy. The proposed scale of site allocations in the emerging Housing Site Allocations Plan is inadequate to satisfactorily demonstrate that Wiltshire's full OAN will be met and a rolling five year housing land supply can be maintained.</p> <p>3.2 When allocating land for new development, local plans must be suitably pragmatic in order to ensure they are an effective tool to manage and deliver development. To achieve this, they should provide sufficient flexibility to respond to changes in circumstances over the plan period. It is important that the emerging Plan does not introduce an approach that places unreasonable restrictions upon sustainable development opportunities. However, we note that a number of sustainable development opportunities do exist across the settlement hierarchy that can support delivery of Wiltshire's full development needs but those have not been adequately considered.</p>				

Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Planning Prospects represent the landowner in promoting land off Calne Road, Lyneham for residential development and have detailed comments with regard to the delivery of that site and with respect to the approach to be taken for the emerging Housing Site Allocations Plan generally.

Comment ID:	3214	Consultee Mr Chris Dodds Associate Director Person ID: 1138508	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No
Please identify the policy, paragraph, table, figure or site to which you are referring.				Positively prepared Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>3.3 The National Planning Policy Framework (NPPF) requires that for a local plan to be found sound (in order to be adopted), it must be positively prepared (meet Objectively Assessed Needs), justified (provide the most appropriate strategy), effective (deliverable over its period) and consistent with national policy.</p> <p>3.4 In preparing its Housing Site Allocations Plan, the Council must take into account that the Core Strategy's proposed distribution of housing below the Housing Market Areas is indicative (Core Strategy - paragraph 28) and that all sustainable settlements, large or small, can play a role in meeting Wiltshire's housing needs. It should therefore take a flexible and positive approach to allocating land for development across its settlement hierarchy, recognising that the level of development considered acceptable in lower order villages should take account of their needs and ability to support further sustainable growth.</p> <p>3.5 It is also essential that sustainable settlements across the hierarchy are enabled to deliver in a manner that will support and expand the range of services and facilities to meet their day-to-day needs. Paragraph 55 of the NPPF seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. We therefore suggest that the site at Calne Road, Lyneham should be allocated where it represents a sustainable location for the growth of Lyneham.</p> <p>3.6 We object to the proposed Housing Delivery Strategy, which introduces a number of restrictions to the growth of sustainable settlements. Paragraph 4.14, for example, indicates that opportunities in some Large Villages have not been explored as allocations in the emerging Housing Site Allocations Plan because Core Strategy housing needs have already been accommodated for the wider Community Area, either through development that has already taken place or that is planned. The draft Allocations Plan suggests that further development brought about by Plan allocations would be in excess of meeting local needs would result in conflict with WCS Core Strategy Policy 1. As a result SHLAA sites from the Large Villages were not considered as reasonable alternatives going forward.</p> <p>3.7 The adopted Core Strategy sets out an indicative number of homes for the Royal Wootton Bassett and Cricklade Community Area but as set out above, that figure is indicative and represents a minimum requirement meaning there should not be an in-principle restriction to development in excess of that figure. Table 4.5 suggests that no allocations are provided for Lyneham which is by far the largest and most sustainable Large Village in the North and West Wiltshire HMA. Lyneham is a settlement capable of accommodating growth, and growth is needed if its services and facilities are to be maintained and enhanced. Development that has taken place elsewhere in the Royal Wootton Bassett and Cricklade Community Area already, will not support services and amenities in Lyneham, nor provide new houses for existing and future residents in the village.</p> <p>3.9 The unnecessarily restrictive approach proposed would result in a Plan that is not positively prepared, not effective and ultimately fails to deliver the housing needed in Wiltshire. It is essential that the site selection process acknowledges that the Core Strategy requirement is flexible and provides only an indicative approach which should ultimately not seek to restrain or restrict Wiltshire's ability to deliver the homes it needs and to maintain a five year housing land supply.</p>			

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	3215	Consultee Mr Chris Dodds Associate Director	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1138508		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.				Justified	Effective
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>3.8 We welcome the review of Settlement Boundaries (as set out at Table 6.2) but the proposed approach continues to use tightly drawn boundaries that would preclude development that is otherwise well related to existing settlements and their associated services and facilities from coming forward. Settlement Boundaries should not be used to prevent otherwise sustainable development from coming forward. Doing so would be contrary to positive approach to sustainable growth set out in the NPPF.</p> <p>3.10 Where restrictive policies are proposed, they should be positively framed in a manner that does not preclude extensions to settlements coming forward where they can be successfully integrated into their wider setting.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>Planning Prospects represent the landowner in promoting land off Calne Road, Lyneham for residential development and have detailed comments with regard to the delivery of that site and with respect to the approach to be taken for the emerging Housing Site Allocations Plan generally.</p>				

Comment ID:	3216	Consultee Mr Michael George Brookes Person ID: 1138534	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Plan stage 2/3. Legally compliant. This is assumed as I have no easy access as a member of the public to relevant documentation. Plan Stage 2 assessment. Accepte, no comments. Plan Stage 3. Assessment is UNSOUND for S1027. Comments: a) SA obj 2. Despite being adjacent to housing, the site with 127 houses proposed, this is a greenfield development with significant BMV removal. b) SA obj 3. Similar to the adverse impact on S1027, existing water/sewage facilities and capacity are inadequate. A Wessex Water capacity assessment is vital, with funded effective reccommendations. Currently no local sewage work is planned until 2020. c) SA obj 5b. Being in flood zone 1, site S1027 is subjected to partial surface flooding annually and since 1989 has suffered complete flooding 3 times. A Flood Risk Assessment with effective funded reccommendations is essential for the security of 127 households. d) SA obj 7. No effective risk reduction measures are detailed that manage the site development to ensure recommendation measures are implemented to maintain green/visual connectivity features. e) SA obj 9. As highlighted by the WCCG, the site needs additional educational/NHS/community services as existing local facilities have no capacity or are too distant, ns S1028. f) SA obj 10. With the introduction of some 100+ cars/vans, a MAJOR adverse impact on the existing Harnham Gyrotory, and local traffic density will occur. An updated Salisbury Traffic Management Strategy with the associated Traffic Assessment with funded and effective remedial action is essential. Recommended changes for S1027 stage 3 assessment to be SOUND are: a) SA obj 2. The proposed site is a SIGNIFICANT greenfield development with BMV removal on the local area. Change assessment to MODERATE adverse impact (ie--). b) SA obj 3. The water supply/sewage existing capacity is clearly inadequate. Until the necessary Wessex Water facilities assessment is completed for the proposed 127 households, the assessment has to be a MAJOR adverse impact (ie---). c) SA obj 5b. with clear evidence of flood zone 1 surface flooding on an annual basis and a major flood zone2/3 every ? 10 years, until a Flood Risk Assessment with funded effective recommendations, the assessment is changed to MAJOR adverse impact (ie---). d) SA obj 7. Until effective rusk reduction measures are detailed that will successfully manage site development to ensure green channel/visual connectivity features, the assessment is changed to MODERATE adverse impact (ie--). e) SA obj 9. Until effective and funded measures are identified to ensure adequate educational/NHS/community services are available, the assessment is changed to MAJOR adverse impact (ie---). f) SA obj 10. Until an updated Salisbury Traffic Management Strategy/local Traffic Assessment with effective and funded remedial action identified, the assessment is changed to MAJOR adverse impact (ie---). Conclusion: Site 1027 should not proceed to stage 4a due to MAJOR adverse impacts at SA obj's 3, 5b, 9 and 10.				

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	3217	Consultee Mr Michael George Brookes	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 2. Despite being adjacent to housing, the site with 127 houses proposed, this is a greenfield development with significant BMV removal. SA obj 2. The proposed site is a SIGNIFICANT greenfield development with BMV removal on the local area. Change assessment to MODERATE adverse impact (ie--).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3218	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA obj 3. Similar to the adverse impact on S1027, existing water/sewage facilities and capacity are inadequate. A Wessex Water capacity assessment is vital, with funded effective recommendations. Currently no local sewage work is planned until 2020.</p> <p>SA obj 3. The water supply/sewage existing capacity is clearly inadequate. Until the necessary Wessex Water facilities assessment is completed for the proposed 127 households, the assessment has to be a MAJOR adverse impact (ie---).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3219	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 5b. Being in flood zone 1, site S1027 is subjected to partial surface flooding annually and since 1989 has suffered complete flooding 3 times. A Flood Risk Assessment with effective funded recommendations is essential for the security of 127 households. SA obj 5b. with clear evidence of flood zone 1 surface flooding on an annual basis and a major flood zone2/3 every ? 10 years, until a Flood Risk Assessment with funded effective recommendations, the assessment is changed to MAJOR adverse impact (ie---).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3220	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA obj 7. No effective risk reduction measures are detailed that manage the site development to ensure recommendation measures are implemented to maintain green/visual connectivity features.</p> <p>SA obj 7. Until effective rusk reduction measures are detailed that will successfully manage site development to ensure green channel/visual connectivity features, the assessment is changed to MODERATE adverse impact (ie--).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3221	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA obj 9. As highlighted by the WCCG, the site needs additional educational/NHS/community services as existing local facilities have no capacity or are too distant, ns S1028.</p> <p>SA obj 9. Until effective and funded measures are identified to ensure adequate educational/NHS/community services are available, the assessment is changed to MAJOR adverse impact (ie---).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3222	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>SA obj 10. With the introduction of some 100+ cars/vans, a MAJOR adverse impact on the existing Harnham Gyrotory, and local traffic density will occur. An updated Salisbury Traffic Management Strategy with the associated Traffic Assessment with funded and effective remedial action is essential.</p> <p>SA obj 10. Until an updated Salisbury Traffic Management Strategy/local Traffic Assessment with effective and funded remedial action identified, the assessment is changed to MAJOR adverse impact (ie---).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3223	Consultee Unknown Unknown Society of Merchant Venturers	Agent Gareth Johns Savills	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 397800	Person ID: 1138537	Do you consider the draft WHSAP is sound?	Yes
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Devizes			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst we do not consider that the Plan is unsound, we would recommend that the Council identify reserve sites and include a policy mechanism to release reserve sites to respond to changed circumstances. This would make the Plan more robust. See Covering Letter for more information. Paragraph 52 of the NPPF confirms that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as extensions to existing towns. The SMV's land at Roundway Park is immediately adjacent to the built-up area of Devizes and identified with the Council's SHLAA as 'suitable' for residential development for up to 396 dwellings. We consider that all or part of the Site (i.e. the eastern part of the site and development of c.4 hectares for around 100 - 120 dwellings) should be identified as a reserve site for the following reasons:</p> <ul style="list-style-type: none"> a) The land between White Horse Way residential development and the Hopton business/industrial park would form a natural rounding off of development in this locality and would not appear as an incursion into the countryside. b) The sites have positive sustainable attributes including easy access to bus stops and a frequent bus service, excellent access to employment opportunities by means other than the private car and good access to services and facilities. c) There are no planning history or policy constraints which would prevent the sites coming forward for housing. d) There are no environmental or physical constraints to the sites. e) The scale of dwellings proposed is capable of delivering housing in line with local objectives, such as need for affordable housing. f) The sites are within the sole control of SMV which will facilitate its timely development. <p>The above demonstrates that the site is suitable, available and achievable for residential development. Moreover there are no constraints which will prevent development on the site.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3224	Consultee Mr Michael George Brookes Person ID: 1138534	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		S3187 Land at Harnham Business Park		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Stage 2/3 legally compliant. This is assumed as I have no easy access to relevant documentation. Plan stage 2 Assessment. Accepted, no comments. Plan stage 3 assessment for S3187 is UNFOUNDED. Comments: a) SA obj 2 (page 115). Site is within city bdy, is a brownfield site and there is no loss of BMV. Potential for housing is greater. b) SA obj 9 (page 127). For say 15 families, local edn capacity is available if S1027 comes to fruition. c) SA obj 10 (page 127). With Harnham Gyratory and current traffic density, an additional 30 households will have adverse effect d) SA obj 12. Disagree with loss of employment. Business Park has been open for ? 10 years, with only one occupant (Booker's). Site is suitable for house, as there is no obvious future commercial dev. Recommended changes to S3187 stage 3 assessment to be SOUND: a) SA obj 2 change to MODERATE positive effect (ie++) b) SA obj 9. Education capacity possible from S1027 if initiated. Change to MINOR adverse effect (ie-) c) SA obj 10. Until solution available for Salisbury's traffic management assessment, additional household cars will have adverse effect on Gyratory/density. Change to MAJOR adverse effect (ie---). d) SA obj 12. With no take up of employing firms over past ? 8 years, housing is possible. Change to MINOR adverse effect (ie-).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3225	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S3187 Land at Harnham Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 2 (page 115). Site is within city bdy, is a brownfield site and there is no loss of BMV. Potential for housing is greater. SA obj 2 change to MODERATE positive effect (ie++)				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3226	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S3187 Land at Harnham Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	SA obj 9 (page 127). For say 15 famalies, local edn capacity is available if S1027 comes to fuition. SA obj 9. Education capacity possible from S1027 if initiated. Change to MINOR adverse effect (ie-)				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3227	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S3187 Land at Harnham Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 10 (page 127). With Harnham Gyratory and current traffic density, an additional 30 households will have adverse effect SA obj 10. Until solution available for Salisbury's traffic management assessment, additional household cars will have adverse effect on Gyratory/density. Change to MAJOR adverse effect (ie---).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3228	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		S3187 Land at Harnham Business Park			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA obj 12. Disagree with loss of employment. Business Park has been open for ? 10 years, with only one occupant (Booker's). Site is suitable for house, as there is no obvious future commercial dev.</p> <p>SA obj 12. With no take up of employing firms over past ? 8 years, housing is possible. Change to MINOR adverse effect (ie-).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3229	Consultee Richborough Estates Person ID: 1138546	Agent Mr Darren Parker Operational Director RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Housing Delivery Strategy		Positively prepared Justified Effective Consistent with national policy		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The LPA's most up-to-date evidence on housing need is provided by Wiltshire Council's Housing Land Supply Statement, which was published in November 2016 (updated in March 2017) with a base date of April 2016. It is not conceded that this comprises the up to date full objectively assessed need for the area.</p> <p>There has been no subsequent review of the HLS position of the SWHMA and while the LPA's Annual Monitoring Report (AMR) for 2017 is in preparation, no additional information has yet been published. The LPA has not published a complete AMR since 2010/11. Further no Partial Review of the Core Strategy has been commenced, let alone completed.</p> <p>As noted within the Council's latest HLS Statement, as of April 2016, 122 dwellings had been completed at Mere with another 33 dwellings delivered within the rest of the CA. There are also 'developable commitments' for a further 143 dwellings at the former, and nine additional dwellings in the latter.</p> <p>In respect of the SWHMA, the Council's most recent HLS Statement was published in November 2016 (update March 2017) with a base date of April 2016. Accordingly, it gives a five-year requirement of 2,912 dwellings between 2016 and 2021. Against this requirement, the Council claims a deliverable supply of 3,316 dwellings or 5.69 years can be demonstrated within the SWHMA Housing Land Supply.</p> <p>However, it is important to note that this does not take into account any buffer, which the Council considers to be 5%. On the basis of a five-year requirement (including 5% buffer) of 3,058 dwellings, this would equate to a HLS in the SWHMA of 5.4 years.</p> <p>Moreover, the above is based on the 'Liverpool approach', whereby shortfall is spread over the Plan period. The Council's reasoning for applying the 5% buffer relies on the conclusions of the WCS Examination Inspector, who considered that there was not a record of persistent under-delivery in the county as a whole at the time of his report. However, the Inspector added that, whilst his conclusions remained the same in terms of most of the individual HMAs, he specifically noted South Wiltshire as an exception, which had seen completions within only 10% of requirements on five separate occasions.</p> <p>Furthermore, the Council's Housing Trajectory illustrates that annual housing delivery within the SWHMA since the start of the plan period has been below the annual requirement every year apart from 2014/15 and 2015/16. In this regard, as of April 2016, there had been a shortfall of 614 dwellings.</p> <p>It is therefore considered that a 20% buffer should be applied to the requirement. Using this, along with the 'Sedgefield approach' (i.e. dealing with any shortfall within the first five years), which is consistent with Planning Practice Guidance, the Council would be able to demonstrate, at best, a five-year HLS of just 4.29 years against a five-year requirement of 3,863 dwellings. Increased objectively assessed need would reduce this figure further to 3.7 years. The NPPF acknowledges that reducing the risk of failing to meet the minimum housing requirement will 'boost significantly the supply of housing' (NPPF para 47) and as a result the plan would only be considered to be positively prepared and effective if it relied upon sites that have not already been identified within the plan. The application of a 20% buffer to SWHMA requirements will provide more certainty that the minimum housing requirement can be reached, rather than relying on minimal builds to come forward.</p>				

	<p>As a consequence of the Council's unwillingness to acknowledge the shortfall, the housing delivery strategy has taken account of limited areas within the South Wiltshire market area and has therefore failed to adequately provide an effective plan in accordance with objective 1. Table 4.6 demonstrates the summary of allocations within the south market area and it is quite clear that Mere is not included. Similarly, table 4.11 demonstrates that with specific regard to Mere, the scale of development does not match the intention of the overall strategy with a percentage variation of -15.</p> <p>Moving back to the overall delivery strategy momentarily, the strategic assessment Stage 2b explains that opportunities for expansion of large villages have not been explored due to the claim that local housing need within the area has been accommodated through planned development (in this instance). SHLAA sites within these areas were not considered to be 'reasonable' and it was deemed that due to the production of neighbourhood plans, settlement specific housing need has already been determined. However, Mere does not benefit from a neighbourhood plan and as per the above has not been considered in terms of the scope for future development. As a result the plan has not been prepared on a strategy that seeks to meet objectively assessed development, is not based on proportionate evidence base and is ineffective in as far as its deliverability due to an anticipated failure to deliver the housing level required.</p> <p>Interestingly, within other settlements and where it suits, it is stated that the indicative levels of housing are not a ceiling and that variations do not present significant issues. This should also be the case for some other tiers of settlement as there is no justification for preventing development over the target figure, within reason. For example, para 440 with regard to the East Wiltshire HMA and Market Towns within the North and West HMA are stated to not have a ceiling figure (para 4.48).</p> <p>Apply a 20% buffer to allow more certainty that the minimum housing requirement will be reached</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Participation within the oral examination will be necessary due to the complexities of the matters concerned in order to adequately convey the necessary arguments against the lack of soundness evident.</p>

Comment ID:	3230	Consultee Richborough Estates Person ID: 1138546	Agent Mr Darren Parker Operational Director RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	No	
Please identify the policy, paragraph, table, figure or site to which you are referring.			Justified Effective Consistent with national policy		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>A very cursory review has taken place with regard to Mere as a result of the assumption that some consented housing sites will be implemented in the near future and a reliance of some windfall development. National Policy requires LPAs to produce plans capable of demonstrating a proactive approach to identifying sites that can be met, rather than awaiting windfall development within each HMA. The topic paper is therefore considered to form an inadequate evidence base due to being contrary to national policy in this regard.</p> <p>Core Policy 17 covers the spatial strategy for the Mere Community Area and states that it should be in accordance with the strategy as set out in Core Policy 1. More specifically and as referred to above, Policy E12 states that from 2006 to 2026 approximately (RPS emphasis) 285 new homes will be provided, of which 235 should occur at Mere and approximately 50 to be provided to the rest of the community area. From this it states that growth in the Mere Community Area may (RPS emphasis) consist of a range of sites in accordance with Core Policies 1 and 2.</p> <p>The above strategy is clearly not intended to provide a development ceiling which renders settlements incapable of further expansion. Indeed, where sustainable and necessary surely the stance should be taken of accepting further development where there is a clear wider need and the benefits of such development outweigh any negativities. Interestingly, paragraph 4.30 of the WCS makes clear that:</p> <p>“The disaggregation to Community Areas set out above is not intended to be so prescriptive as to be inflexible and potentially ineffective in delivering the identified level of housing for each market area. It clarifies the council’s intentions in the knowledge of likely constraints in terms of market realism, infrastructure and environmental capacity. They provide a strategic context for the preparation of the Housing Sites Allocation DPD and in order to plan for appropriate infrastructure provision.”</p> <p>The stipulated figures therefore show a minimum to be allocated, but a surplus is necessary to maintain five year supply of housing land in each HMA and to surpass the buffer in excess of five years required by para 47 of the NPPF. Due to the council having elected to fail to take into account new sites and rely on currently consented sites with no guaranteed prospect of such sites coming forward, it is contended that an inadequate housing supply will remain. In order for CP17 to be considered effective therefore, the Richborough Estates site at Castle Street, Mere should be included within the development boundary. As it stands, the failure to have any regard to any additional sites at Mere entails that there is little justification for the way in which the review has taken place.</p> <p>The Issues and Considerations section of the Topic Paper states that the outcomes stipulated by CP17 are to be addressed within the Mere Community Area include a future growth balance and to address the shortage of affordable homes. As no alternative sites have been considered, the plan should be deemed ineffective in terms of its failure to adhere to Policy CP17.</p> <p>In addition to the above, reference is made to the Wiltshire Infrastructure Delivery Plan (IDP) that identifies specific infrastructure requirements to be addressed within the community areas. In particular, two of the requirements are:</p> <ul style="list-style-type: none"> • Primary and Secondary School extensions; and • To support the development of local primary care facilities, as most practises are at capacity. <p>These requirements are caveated with the statement that they should not restrict the delivery of housing proposed over the plan period. So essentially, developments that do not contribute to these things will remain to be considered. In that regard, it does not seem logical to discount a</p>				

site that would provide a primary care facility in totality and contributions towards necessary school enhancements. Which leads to the conclusion that given the ideal location of the site, coupled with the multiple stipulated requirements being met, its lack of inclusion within the settlement boundary is therefore completely contrary to both national and local objectives.

Core Policy 17 also acknowledges that there is a risk that Mere will become a dormitory settlement unless future growth includes adequate housing and employment provision. It is not specifically stated, but this is partly due to the aging population which encourages less economic output and housing movement. The provision of further sites will attract younger, prosperous generations to the area which will in turn enhance economic activity and as such have a positive impact on the settlement and the wider area.

Policy H3 refers to land allocated for residential development at sites within the South Wiltshire HMA, which correlate with the settlement boundary extensions as set out in the Community Topic Paper. The site at land at Castle Street, Mere is not included within the South Wiltshire Housing Allocation and has not been considered. This is set out in further detail below.

4. Settlement Boundary Review

Paragraph 47 of the NPPF looks at specific policy areas with regard to delivering a wide choice of high quality homes. It states that to boost the supply of housing, Local Authorities should:

- ‘Make use of their evidence base to ensure that plans meet the full objectively assessed needs for market housing and affordable housing within housing market areas, as far as consistent with framework policy, identifying key sites critical to housing delivery over the plan period;
- Annually identify a supply of deliverable sites sufficient to provide a five-year supply of housing; and
- Identify a supply of specific, deliverable sites or broad locations for growth.’

The council have made the assumption that current figures for Mere are sufficient to meet need and thus the settlement boundary review has predominantly taken account of consented developments and areas that should have formed part of the settlement boundary previously. This is contrary to general goals of the NPPF that are centred around encouraging housing provision and it would appear that not only has there been no regard to alternative sites, but also a Sustainability Appraisal has not been undertaken for Mere in order to establish what scale of development could realistically be accommodated. A rigorous assessment has therefore not been undertaken.

The settlement boundary review was informed by the site selection process as outlined in Topic Paper 2: Site Selection Process Methodology. Stage 1 of the site selection process focusses on community areas where housing land supply requires supplementing from 2006-2026. By adopting this approach and assuming that housing need for Mere is sufficient, it eradicates any further sites that could come forward in the short-term to meet housing need. Not to mention that the stipulated requirements should not form a ceiling and where possible and appropriate, the required housing provision should be exceeded in order to ensure that housing need is met without a heavy reliance on windfall sites. It is clear from this that the strategy is flawed and therefore unjustified and ineffective in terms of seeking to accommodate housing need within the Southern HMA.

Table 2.2 dictates that the indicative (RPS emphasis) residual requirement for Mere to be delivered has been met and as a result it is claimed that the plan will not need to allocate additional land. The site selection process therefore ends at stage 1 as explained above. As a result of this, a Strategic Assessment has not been undertaken and SHLAA sites have not been considered. Further, a viability assessment has not been undertaken. In this vein, Land at Castle Street, Mere is completely viable and this has been demonstrated by the fact that an application has been submitted proposing the development of the site and its promotion prior to the application submission. In terms of viability, the site is situated within a 30% Affordable Housing Zone, where a net, on-site provision of at least 30% affordable housing is required.

It is apparent that no further options/alternatives have been considered for Mere and the lack of a sustainability appraisal should be unsupported in terms of determining the acceptability of a sites inclusion.

In terms of the physical boundary review that has taken place, it should be noted that it has included additional consented sites that wrap around the site to a further extent. Given that the council are confident about the additional sites coming forward, the area of land in question forms a logical boundary extension to a further extent that ties the two sides of the settlement together either side of Castle Street.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to

Participation within the oral examination will be necessary due to the complexities of the matters concerned in order to adequately convey the necessary arguments against the lack of soundness evident.

participate at the oral part of the examination?	
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Comment ID:	3231	Consultee Richborough Estates Person ID: 1138546	Agent Mr Darren Parker Operational Director RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?	No	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Housing Site Allocations		Positively prepared Justified Effective Consistent with national policy		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>5. Land at Castle Street, Mere</p> <p>As the Council is aware an outline application for residential-led development on the site was refused on 26th May 2017 (ref. 16/12217/OUT). The full description of development for the application is:</p> <p>‘Outline planning application for residential development (including affordable housing) and GP surgery, in addition to associated open space, infrastructure and attenuation features with all matters reserved, except access.’</p> <p>The site is situated within a sustainable location that has the capability of providing an attractive ‘soft’ landscape buffer in order to serve as a distinctive gateway feature to the southern approach to Mere via Mapperton Hill. The site would therefore fully integrate with the existing settlement and form a well thought-out urban extension that does not cause undue harm to the current form of the settlement edge. In recognition of this, the pre-application landscape input included the point that the site is located well within the ‘Urban Gateway’. That being the area whereby the character of the approach to Mere becomes built-up, but prior to the ‘distinctive historic core that marks the traveller’s arrival’. The inclusion of the additional sites surrounding the site in question entails that it constitutes a logical extension to a further degree. The inclusion of the site will assist with economic growth and boost the supply of housing by providing a mix of high quality family homes including an element of affordable housing (30%) for those on lower incomes as required by Core Policy 17. The development would generate spend on construction and related jobs (approximately £15 million estimated on construction of the proposed development). Once completed the development would generate an additional expenditure of £2.17 million, a £1.25 million uplift in annual leisure expenditure. This would equate to 41 FTE jobs in supporting retail and leisure related jobs annually. Some 150 person of working age. As well as housing delivery in Mere, Core Policy 17 of the Wiltshire Core Strategy identifies specific issues required to be addressed through the planning system. This includes the strengthening of Mere as a village, improved access and a good mix of uses. The proposed site is adjacent to employment land and the provision of land for a new GP surgery will assist in improving local accessibility to medical services and positively contribute towards the health and wellbeing of the local community. Environmental benefits include retaining the hedgerows and existing mature trees (where possible), which will be complemented with new native hedgerow planting along the existing field boundaries. New pedestrian connections with existing communities would be established and natural areas provided to improve access to the countryside. Adequate contributions will be made towards the maintenance and enhancement of existing public infrastructure, including leisure and education facilities, where appropriate. The provision of improved community facilities and infrastructure are a stipulated requirement for Mere whilst also protecting the built and natural heritage. The proposal is compliant with these requirements and therefore should be viewed as a necessary settlement extension, capable of satisfying the needs that have been disregarded within the plan. Paragraph 49 of the NPPF expresses the government ambition to ‘boost significantly the supply of housing’. It is contended that the failure to consider additional sites for Mere, over and above a perceived and incorrectly applied ‘cap’ is contrary to this pertinent government objective.</p>				

	Extend the settlement boundary to include Land at Castle Street, Mere (app. Ref 16/12217/OUT) and allocate the site for the development proposed by Richborough Estates
Attached files (Please see Objective)	4750521
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3232	Consultee Richborough Estates	Agent Mr Darren Parker Operational Director	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138546	RPS Planning & Development Person ID: 1133715	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Plan objectives		Justified Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There are three objectives to the DPD and these comprise of the settlement boundary reviews, a demonstration of an 'adequate' Housing Land Supply and sufficient site allocations.</p> <p>Objective 1, which considers the settlement boundary review, has been stated to apply a consistent methodology for the County to replace the varying methodologies formerly applied by the District Councils. In short, a policy review, followed by the application of principles applied by other LPAs and the consideration of issues raised in feedback with the Regulation 18 Consultation has taken place.</p> <p>Objective 2 concerns the requirement to demonstrate a rolling five-year housing land supply of deliverable land. Within the plan this acknowledges that some greenfield sites must be identified, involving the loss of countryside in order to achieve this objective. It is further stated that a 'realistic allowance' is included for the source of new housing when calculating the scale of land supply.</p> <p>Objective 3 refers to site allocations to support the spatial strategy set out within the Core Strategy. To fulfil this requirement a hierarchical settlement approach has been adopted in which Local Service Centres have been identified as having a level of facilities and services that provide the best opportunities outside of Market Towns for Sustainable Development.</p> <p>In terms of Objective 1 and 2, it is contended that the plan has not reviewed settlement boundaries to the degree that is necessary and neither has it provided a succinct account of the HLS situation so as to properly inform the plan. By virtue of this it is deemed to be ineffective, unjustified and fails to have been prepared in a positive manner. It follows that objective 3 fails to be satisfied also, as a result of the lack of acknowledgement of an insufficient supply which in turn leads to inadequate allocation.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Participation within the oral examination will be necessary due to the complexities of the matters concerned in order to adequately convey the necessary arguments against the lack of soundness evident.				

Comment ID:	3233	Consultee Mr Michael George Brookes Person ID: 1138534	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H3.1				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Stage 2/3 legally compliant. This is assumed, as I have no easy access to relevant documentation.</p> <p>Plan Stage 2 assessment. Accepted no comments.</p> <p>Plan Stage 3 assessment is UNSOUND for S1028. Comments:</p> <p>a) SA obj 1 (page 95). Risk reduction measure for adverse impact on biodiversity issues and to Petersfield STC capacity (as highlighted by HRA) are too simplistic.</p> <p>b) SA obj 2 (page 97). This is clearly a MAJOR greenfield development and a major removal of BMV.</p> <p>c) SA obj 3 (page 97). As highlighted by the Wessex Water utility, the water/sewage capacity is totally inadequate for 1195 households. With no sewage work planned until 2020, a Wessex Water facilities appraisal is needed to identify remedial work required and the timeframe.</p> <p>d) SA obj 5b (page 103). Annually, site 1028's lower levels inevitably flood and since 1989, major flooding across the river valley and INCL site 1028's lower levels has occurred. A Flood Risk Assessment is most vital for stage 4a approval, for the site of 1100+ households.</p> <p>e) SA obj 7 (page 107). Site is part of Woodland Down classification with significant visual connectivity across the valley to the Cathedral. No risk reduction measures are highlighted to ensure/manage any site developers introducing recommended features below 75m contours.</p> <p>f) SA obj 9 (page 109). As highlighted by the WCCG, the site is totally dependent on the developer's plan to provide adequate education/NHS/community and employment facilities. No measure has been offered to ensure coordination/facilitating and management of these vital facilities' delivery.</p> <p>g) SA obj 10 (page 110). With introduction of some 1000+ cars/vans, a major adverse impact on the Harnham Gyrotory and local traffic density will occur. The Salisbury Traffic Strategy and a Traffic Assessment is vital before stage 4a approval.</p> <p>Recommended changes for S1028 stage 3 assessment to be SOUND:</p> <p>a) SA obj 1. Adverse impact on biodiversity issues are severe with 1100+ properties. Change assessment to MAJOR adverse impact (ie---).</p> <p>b) SA obj 2. The proposed development is clearly a MAJOR greenfield development and a major removal of BMV to the local area. Change assessment to MAJOR adverse impact (ie---).</p> <p>c) SA obj 3. The water/sewage existing capacity is totally inadequate for 1100 households. Until a Wessex Water facilities appraisal is completed and remedial action taken the assessment has to be MAJOR adverse (ie---).</p> <p>d) SA obj 5b. Given the risk of significant flood on an annual basis to the lower levels of S1028, and of major flooding every ? 10 years, until the vital Flood Risk Assessment is complete and relevant remedial measures the assessment has to be a MAJOR adverse impact (ie---).</p> <p>e) SA obj 7 Until strong risk reduction measures are identified that will successfully manage the site development, to ensure greenfield and visual connectivity, the assessment is changed to MODERATE adverse impact (ie--).</p> <p>f) SA obj 9. Effective risk reduction measures to ensure coordinated design and implementation of the vital education/NHS/Community and employment facilities for 1100+ households, have not been identified. The assessment is changed to MAJOR adverse impact (ie---).</p>			

	<p>g) SA obj 10. Until the Salisbury Traffic Strategy is drawn up with fully funded proposals & a subsequent Traffic Management Assessment is made with fully funded proposals, the assessment is to reflect a MAJOR adverse impact (ie---). Conclusion: Site S1028 should not proceed to stage 4a due to MAJOR adverse impacts at SA obj's 1, 2, 3, 5b, 9 and 10.</p>
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3234	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA obj 1 (page 95). Risk reduction measure for adverse impact on biodiversity issues and to Petersfield STC capacity (as highlighted by HRA) are too simplistic.</p> <p>SA obj 1. Adverse impact on biodiversity issues are severe with 1100+ properties. Change assessment to MAJOR adverse impact (ie---).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3235	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 2 (page 97). This is clearly a MAJOR greenfield development and a major removal of BMV. SA obj 2. The proposed development is clearly a MAJOR greenfield development and a major removal of BMV to the local area. Change assessment to MAJOR adverse impact (ie---).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3236	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 3 (page 97). As highlighted by the Wessex Water utility, the water/sewage capacity is totally inadequate for 1195 households. With no sewage work planned until 2020, a Wessex Water facilities appraisal is needed to identify remedial work required and the timeframe. SA obj 3. The water/sewage existing capacity is totally inadequate for 1100 households. Until a Wessex Water facilities appraisal is completed and remedial action taken the assessment has to be MAJOR adverse (ie---).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3237	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 5b (page 103). Annually, site 1028's lower levels inevitably flood and since 1989, major flooding across the river valley and INCL site 1028's lower levels has occurred. A Flood Risk Assessment is most vital for stage 4a approval, for the site of 1100+ households. SA obj 5b. Given the risk of significant flood on an annual basis to the lower levels of S1028, and of major flooding every ? 10 years, until the vital Flood Risk Assessment is complete and relevant remedial measures the assessment has to be a MAJOR adverse impact (ie---).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3238	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 7 (page 107). Site is part of Woodland Down classification with significant visual connectivity across the valley to the Cathedral. No risk reduction measures are highlighted to ensure/manage any site developers introducing recommended features below 75m contours. SA obj 7 Until strong risk reduction measures are identified that will successfully manage the site development, to ensure greenfield and visual connectivity, the assessment is changed to MODERATE adverse impact (ie--).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3239	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA obj 9 (page 109). As highlighted by the WCCG, the site is totally dependent on the developer's plan to provide adequate education/NHS/community and employment facilities. No measure has been offered to ensure coordination/facilitating and management of these vital facilities' delivery.</p> <p>SA obj 9. Effective risk reduction measures to ensure coordinated design and implementation of the vital education/NHS/Community and employment facilities for 1100+ households, have not been identified. The assessment is changed to MAJOR adverse impact (ie---).</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3240	Consultee Mr Michael George Brookes	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138534	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA obj 10 (page 110). With introduction of some 1000+ cars/vans, a major adverse impact on the Harnham Gyratory and local traffic density will occur. The Salisbury Traffic Strategy and a Traffic Assessment is vital before stage 4a approval. SA obj 10. Until the Salisbury Traffic Strategy is drawn up with fully funded proposals & a subsequent Traffic Management Assessment is made with fully funded proposasl, the assessment is to reflect a MAJOR adverse impact (ie---).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3241	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
		Person ID: 645345	Person ID: 1138525		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>1. Introduction</p> <p>These representations have been prepared by Savills on behalf of Hallam Land Management (HLM), in response to the Wiltshire Housing Site Allocations Plan Pre-Submission Draft Plan.</p> <p>HLM control an area of land approximately 11.05 hectares in size adjacent to the eastern edge of Warminster, a proportion of which is allocated within the Draft Plan under Policy H2.7 (East of the Dene, Warminster) for residential development. The land has previously been promoted through the Wiltshire Core Strategy, and throughout the Site Allocations DPD process, seeking an allocation for residential development. The site has also been submitted previously to the SHLAA. A copy of the Site Location Plan is attached at Appendix 1.</p> <p>In addition, an outline planning application was submitted in October 2016 for the development of the site for up to 135 residential dwellings. This application is currently pending a decision. A significant amount of technical work has been prepared to support the application proposals, all of which concludes that there are no technical or environmental matters which would preclude development and that appropriate design and mitigation measures can be readily implemented to create an attractive high-quality development. Indeed, the proposals have evolved to respond to the technical evidence prepared as well as comments provided by officers at Wiltshire Council, local interested parties, and Warminster Town Council.</p> <p>It is therefore considered that the development of the site would be technically sound and is entirely deliverable and achievable. Furthermore, HLM have control of all the land outlined in the plan attached at Appendix 1, which is considered a significant benefit.</p> <p>The suitability and sustainability credentials of the land strongly support its allocation for development through the emerging Housing Site Allocations Plan, and the allocation of this site would enable a positive and balanced spread of development across the town. There are a number of further benefits to the proposed allocation, including:</p> <ul style="list-style-type: none"> The delivery of housing and affordable housing for the local community, in accordance with the identified need set out in the Council's Strategic Housing Market Assessment; The locational sustainability merits of the site, including the excellent pedestrian and cycling connectivity; Balanced delivery of housing across Warminster; Integration of development with the existing urban form so that the development will be observed within the context of the adjacent built edge; The delivery of a high quality residential environment that can embrace local character and vernacular; The lack any significant technical or environmental constraints to development; The potential to deliver high quality green infrastructure that can provide biodiversity and recreational benefits. This includes considerable areas of open space on the site, over and above adopted policy requirements, in the form of formal sports and informal provision including children's play space, allotments and a community orchard; Support for the development of the site from Warminster Town Council, including a letter of support for the pending outline planning application (see Appendix 2); and 			

Financial benefits derived from the development including but not limited to employment creation.

These Representations focus on the draft allocation of the site, and the evidence supporting the draft Housing Allocations Plan. Overall, whilst we fully support the allocation of the site in principle and welcome the Council's recognition that the site is suitable for development, we are concerned that the current wording and allocation boundary for Policy H2.7 will unnecessarily restrict the delivery of development upon the site, and stifle the masterplanning process. This includes the allocation of the site for 100 dwellings which is considered an underprovision given that the outline planning application demonstrates that a higher figure can be readily accommodated and the draft wording "2ha of undeveloped land to be located in the south west part of the site" is overly prohibitive in masterplanning terms.

We have therefore proposed, within the final section of these representations, changes to draft Policy H2.7 to address these concerns and ensure that the policy is sound and that a well-planned and well-designed residential development can come forward.

These representations are structured as follows:

Section 1: Introduction and Update on Outline Planning Application;

Section 2: Overview of Evidence Supporting the Allocation of Land East of the Dene, Warminster;

Section 3: Response to draft Policy H2.7 (East of the Dene, Warminster);

Section 4: Conclusion

Outline Planning Application – Latest Position

An outline planning application was submitted in October 2016, for the land outlined on the plan attached at Appendix A.

The application was registered under reference number 16/10502/OUT, with the following description of development:

Outline application for the demolition of existing agricultural building, removal of a section of boundary wall, and residential development of up to 135 dwellings with associated access, landscaping and open space (Reserved matters: Access)

The outline planning application was submitted following pre-application discussions with Wiltshire Council. In particular, a pre-application enquiry was submitted to Wiltshire Council in February 2016, and a formal written response received on 14 March 2016 (ref: 16/01612/PREAPP).

The applicant comprehensively reviewed the pre-application response from Wiltshire Council and made positive changes to the draft proposals to address the various comments received, including:

Enlarging the site area so that it encompasses the northern field (i.e. the field north of Grange Farmhouse) to provide a comprehensive masterplan which provides greater social and environmental benefits;

Providing a deeper set back of the proposed building line from the Conservation Area near the Home Farm track, and adopting a wider area of greenspace and planting to include a Community Park along the eastern edge of the site to create an appropriate landscape edge;

Locating new housing away from Home Farm and Bishopstrow Court;

Ensuring that new housing is well-designed and has regard to local character and vernacular, particularly near the Conservation Area where lower-density building groups are adopted;

Introducing wider corridors of green space and landscape planting around the perimeter of the site, to include the interface with properties on Grange Lane;

Providing a greater amount of accessible green space that will provide wider community benefits, this includes a Community Park in the north eastern part of the site that can accommodate new planting, community orchards, space for play and recreation, along with walking and cycling routes;

A reduction in the average density across the site from 35dph to 33dph and ensuring that new housing will be no more than 2 storeys in height.

During the determination period, comments were received from statutory consultees and members of the public, and, as a result, further modest changes were made to some of the application plans to address the outstanding matters. On 11 May 2017, revised material was submitted to Wiltshire Council to address matters relating to highways, heritage, drainage and ecology.

Overall, of the statutory consultees who have commented on the planning application, the following support the proposals:

Wiltshire Council Highways Officer;

Wiltshire Council Drainage Officer;

Wiltshire Council Housing Officer;

Wiltshire Council Environmental Health Officer;

Wiltshire Council Play & Leisure Strategy Officer;
Wiltshire Council Waste Collection Team;
Wiltshire Council Rights of Way Officer;
Wiltshire Council Arts Service;
Department Of Children Services;
County Archaeologist;
Environmental Control and Protection Officer;
Environment Agency;
Wessex Water;
Warminster Town Council;
Ministry of Defence

Therefore, the only outstanding matters relating to the outline planning application relate to HRA, conservation and landscape. Although there is no objection from the Council's Landscape Officer on landscape and visual issues, the officer's concerns are instead in relation to the masterplan's approach to conservation issues. These are matters however for which the applicant has provided a significant amount of evidence to demonstrate that the development would sensitively respond to the identified heritage and landscape constraints. Furthermore, given that the Housing Site Allocations evidence base underpinning the proposed allocation of the site, supports the development of the site in principle from a heritage and landscape perspective, it is considered that these outstanding matters on the planning application are capable of being addressed. It is important to note the support of the Town Council, who, having been through the Neighbourhood Plan process, still considered the site to be appropriate to support.

2. Overview of Evidence Supporting the Allocation of Land East of the Dene, Warminster

Having reviewed the evidence base supporting the Housing Site Allocations Plan, it is considered important to provide an overview of, and response to, the relevant evidence which confirms the suitability of the land East of the Dene, under Policy H2.7. The documents covered in this section include the following:

Sustainability Appraisal

Sustainability Appraisal Annex 1 A.11 Warminster Market Town

Stage 4a Site Landscape Assessment

Habitat Regulation Assessment.

The relevant evidence is outlined below, including extracts which support the suitability of the site for development. This is also supplemented with technical evidence which has been prepared to support the current outline planning application, which demonstrates the suitability of the site on a variety of sustainability grounds.

3. Policy H2.7 (East of the Dene, Warminster)

We strongly support the allocation of the Land East of the Dene as an entirely appropriate and suitable option for future development. The evidence demonstrates that the development of the site would be technically sound and that the suitability and sustainability credentials of the land strongly support its allocation for development.

However, we have significant concerns over the scope and form of draft Policy H2.7, which, in its current form is considered to have the potential to unnecessarily restrict the delivery of the site and stifle the masterplanning and placemaking process. The main areas of concern are:

Reference to "2ha of undeveloped land to be located in the south west part of the site";

Draft site allocation boundary;

Site capacity of 100 dwellings;

Firstly, there is considered to be no reasoned justification to support a 'buffer' of 2 hectares in size. Not only is this not justified by the evidence but it would unnecessarily limit the developable area, resulting in the loss of potentially 66 homes (if one applies a density of 33dph as shown by the planning application).

The draft Plan, at paragraph 5.89 states that "the south west part of the site is considered to be unsuited to built development because of its sensitivity in heritage and landscape terms". This is contrary to the Council's own evidence, which highlights the general heritage and landscape constraints which exist and would need to be carefully considered as part of any future application proposals, but specifically concludes that the

south west and north west parts of the site are less constrained. Indeed, the evidence suggests that mitigation may be necessary in the southern and eastern parts of the site given proximity to the Conservation Area and heritage assets, not the south western parts of the site. As already outlined, the current outline application proposals have been sensitively designed to be sympathetic to, and compatible with, the Conservation Area and heritage assets. In particular, the proposals incorporate a significant green corridor along the eastern boundary of the site, and the proposed development area has been 'pulled away' from Boreham Road along the southern boundary of the site, to respond to the nearby heritage assets.

The application proposals incorporate approximately 66,600 sqm of multi functional green space across the site, resulting in a significant overprovision when compared to a requirement of 8,140 sqm required by the Council's Leisure and Recreation Development Plan Document. With a significant over-provision of open space, and a sensitive response to the constraints, the site has the potential to deliver a quantum of development in excess of 100 dwellings which will help to address the diminishing housing supply as confirmed in the Housing Land Supply Paper June 2017 which will fall below the required five year supply in the N&W HMA in years 2024/25 and 2025/26 (Table 3.4). Importantly, the application proposals respond to the constraints without the need to exclude a significant element of the site closest to the eastern boundary, as currently shown in the draft allocation boundary. We have significant concerns with the extent of land excluded by this draft allocation boundary, when compared to the site boundary for the application site.

In our view, there are significant benefits to including all of the land currently included as part of the outline planning application, and shown at Appendix 1 within a future allocation. Most importantly, the ability to provide quality and useable green space for the benefit of the local community. By unnecessarily restricting the eastern part of the site, the draft policy reduces the ability of development proposals to plan for a high quality environment for future and existing residents. Such a constraint also unnecessarily restricts the ability of the site to introduce appropriate mitigation to overcome the identified heritage constraints, as required by the draft Plan, and highlighted through the supporting evidence.

Overall, it is considered that there is no justification for reducing the extent of the site with the site boundary as currently drafted within Policy H2.7, as well as a lack of justification for designating an area of land within the site as 'undeveloped'. We consider the draft policy in its current form to be too prescriptive and should be revised to instead cover the key principles and development requirements for the site.

In this respect, we recommend the policy be re-worded as follows:

Policy H2.7

Land east of The Dene, as identified on the policies map, is allocated for residential development, comprising approximately 135 dwellings.

Development will be subject to the following requirements:

Delivery of approximately 135 dwellings, with a target of 30% affordable homes;

Suitable vehicular access via Boreham Road, along with pedestrian connections to create permeable routes to the surrounding area;

Surface water management that achieves equivalent or less than current Greenfield rates of run-off;

Sensitive design which responds to the adjacent Bishopstrow Conservation Area and designated heritage assets, including the potential for a strategic landscaping along the eastern site boundary to provide a 'development buffer';

The provision of areas of greenspace for play and recreation, including areas of equipped play, playing pitches, parks, and the potential for allotments.

appropriate areas of green infrastructure providing opportunities for biodiversity enhancement, recreation, cycle and pedestrian routes and local food production;

It is not entirely clear from the draft Plan how the Council would approach the requirement for a masterplan as part of development, and we consider this should be clarified. There are a number of inconsistencies within the draft Plan where masterplans are required for some draft allocations, but not all. From a review of the plan it would appear that a supporting masterplan is required for only 5 of the 24 draft allocations, for a scale of development ranging from 50 dwellings to 640 dwellings. This current approach taken is considered to be unjustified and onerous.

In our view, a masterplan which supports a planning application, as is the case with the current outline planning application, should be sufficient. Indeed, the outline planning application is supported by a Development Framework Plan and Indicative Layout Plan which demonstrate how the site is capable of accommodating up to 135 residential dwellings, along with the required supporting infrastructure and services.

We have therefore recommended that the current requirement for a masterplan to be prepared is removed from Policy H2.7.

4. Conclusion

	<p>For the reasons outlined in these representations, whilst we strongly support the allocation of the land East of the Dene, Warminster, given the highly sustainable nature of the site, we are concerned with the policy wording of draft Policy H2.7. The policy, as currently drafted will unnecessarily restrict the delivery of the site through the designation of 2ha of undeveloped land in the south west part of the site, the site allocation boundary and by limiting development to 100 dwellings.</p> <p>In order to ensure the Housing Site Allocations Plan is sound, we have proposed changes to Policy H2.7 to ensure that the policy includes the key principles and development requirements for the site, as specified through the available evidence.</p> <p>The revisions to the policy will ensure that development is not unnecessarily restricted and that sufficient flexibility exists to ensure that proposals for the site have the opportunity to promote development which responds in the most effective manner to the site constraints whilst ensuring such development is deliverable.</p> <p>The outline planning application for the site (16/10502/OUT), which is currently being determined by Wiltshire Council, is already supported by the necessary design and technical information to demonstrate the suitability of the site. In particular, a Development Framework Plan and Indicative Layout Plan show that the site is capable of delivering up to 135 residential dwellings alongside a significant provision of multi functional open space. Furthermore, with the exception of heritage and landscaping, all technical aspects of the planning application have been found acceptable by officers.</p> <p>Overall, we strongly support the allocation of the site with the changes proposed to Policy H2.7 set out within these representations. Given the potential significant implications for the site as a result of the current policy wording, we would welcome the chance to discuss the site with the Council's Planning Policy Team at the earliest opportunity, and to provide assistance where required.</p>
Attached files (Please see Objective)	4749819 / 4749814
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.

Comment ID:	3242	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management Person ID: 645345	Savills Person ID: 1138525	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Sustainability Appraisal This section expands upon the Sustainability Appraisal and provides a summary under each objective. SA objective 1. Protect and enhance all biodiversity and geological features and avoid irreversible losses The SA provides the following summary in relation to the site: “The site comprises arable fields bordered by hedgerows with trees, scrub and small areas of grassland. Mitigation to offset the potential effects of development on local ecological features is likely to be possible, which would need to be determined by an ecological assessment in support of a planning application to inform mitigation, compensation and enhancement measures. Due to the relationship of the site with the SAC and SPA, likely significant effects are triggered based on a settlement level HRA screening. An appropriate assessment is required if the site is taken forward into any subsequent stage of the selection process. Overall it is considered that the effects would be moderate adverse given mitigation associated with the River Avon SAC is likely to be problematic”.</p> <p>As outlined in the previous section of these representations, an outline planning application has already been submitted to Wiltshire Council, and is currently being determined. This application is supported by an Ecological Appraisal, prepared by FPCR.</p> <p>The Ecological Appraisal is based upon a number of surveys undertaken over several years including an Extended Phase I Habitat Survey and various further species specific surveys completed between 2008 and August 2016. The report concludes that the impact upon the Salisbury Plain SPA/SAC can be adequately mitigated in line with the conclusions of the Core Strategy HRA and that there are no anticipated adverse impacts upon non-statutory designated sites. Therefore, with appropriate mitigation, including a significant level of green infrastructure provided, the development and the application proposals would have no significant adverse impact upon protected species or habitats.</p> <p>In addition, the site itself is considered to have limited habitat value. It comprises predominantly species poor semi-improved grassland, arable land and tall ruderal vegetation which is commonplace and supports a low diversity of species. Similarly, the hedgerows, whilst protected under the NERC Act (2006), exhibit restricted diversity. As part of the ‘ground up’ approach to masterplanning all of the mature trees and hedgerows on the boundary of the site have been retained and located within areas of green space as part of the application proposals and there will therefore be no harmful impact upon these features. In addition, the veteran trees within the site have been retained and protected as part of the scheme. The Ecological Surveys identified no badger setts within or immediately adjacent to the site and no records of badger setts within the vicinity, the site is considered to have only limited value as a habitat for breeding birds, and the protection and retention of boundary hedgerows and trees will ensure no harmful impact. There are no water bodies within or adjacent to the site suitable for Great Crested Newts. The site is considered to have low potential for invertebrates as it is relatively small and lacks floristic diversity.</p> <p>Overall, the Report concludes there are no reasons on ecological grounds to restrict development of the site. Mitigation measures required for the protection of hedgerows, trees within the site and along the site boundaries and species specific mitigation measures can be addressed through suitably worded conditions. This is a position supported by the Council’s Ecology Officer, who, in a consultation response to the application on 17 November 2016 stated:</p>				

	<p>“Over half of the site is designed as open space and I expect that the Council can be confident that the development will be capable of delivering a net gain for biodiversity in accordance with Core Policy 50. Few ecological features are of any more than local value and I expect it will be possible to retain the range and abundance of species within the indicative layout which provides a significant amount of new planting and wide buffers to existing planting”.</p> <p>Indeed, the development’s Green Infrastructure proposals would enhance biodiversity with a range of new habitats such as broadleaved trees and species rich hedgerows, grassland that can be designed and managed for biodiversity benefits, and the introduction of wetland planting and grassland mixes as part of the drainage strategy. The consultation response also recommended conditions requiring the submission of a Landscape and Ecological Management Plan (LEMP) and Construction Environmental Management Plan (CEMP) prior to the commencement of development.</p> <p>A copy of the consultation response is attached at Appendix 3.</p> <p>We therefore do not agree that the effects on Objective 1 would be ‘moderate adverse’.</p> <p>Habitat Regulation Assessment</p> <p>The Council has commissioned an updated Habitat Regulation Assessment (HRA) to support the emerging Housing Site Allocations Plan. This supports the ability of the site, along with the other sites identified in the draft Plan for Warminster, to deliver residential development to meet the identified need without resulting in significant impacts.</p> <p>In particular, the Assessment, on page 46, states that</p> <p>“Planned housing growth including the DPD policies, extant permissions, pending applications and recent delivery (2006-16) is still within the Core Strategy indicative housing targets for the vast majority of settlements and community areas within the visitor catchment of Salisbury Plain. The only exception is at Warminster town, where a masterplan has been approved by the Council which would see the Core Strategy allocation deliver approximately 650 more houses than the Core Strategy had allocated. However based on planned housing trajectories, the majority of this planned housing would not be delivered until well after the end of the current plan period (i.e. post-2026), indeed even when all the in-combination growth is considered there is still expected to be an under delivery of 292 dwellings at Warminster at the end of the current plan period compared with the Core Strategy indicative requirements. Therefore the in-combination effects of growth are arguably still lower than was anticipated in the Salisbury Plain Mitigation Strategy”.</p> <p>Furthermore, on page 55 of the Assessment, it is stated that “the three allocations at Warminster will deliver an estimated 200 dwellings. Wessex Water’s forecasts used in the NMP took account of a population increase of 1,563 residents between 2010/11 and 2020/21, equivalent to 689 dwellings (@2.2 persons / dwelling). The allocations are therefore well within the NMP growth scenario (assuming that all dwellings were completed by 2021), and as such it is concluded that the plan would not compromise the delivery of the NMP target reductions through phosphate loading from increased sewage discharges of these dwellings alone”.</p> <p>Indeed, it is now clear that all planned development at Warminster, including the proposed allocation for Land East of the Dene, has been assessed as part of an updated HRA which supports the draft Housing Site Allocations Plan. This confirms that such development proposals would be within the headroom of the HRA assessment, and therefore would not result in any adverse impacts.</p> <p>Therefore, whilst we have yet to receive the Council’s HRA for the current outline planning application, the updated HRA which supports the draft Housing Site Allocations Plan confirms that this matter can be addressed</p>
<p>Attached files (Please see Objective)</p>	<p>4749824</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.</p>

Comment ID:	3243	Consultee C/O Agent Hallam Land Management Person ID: 645345	Agent Mr Nick Matthews Director Savills Person ID: 1138525	Do you consider the draft WHSAP is legally compliant?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site			Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.7		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Effective	Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA objective 2. Ensure efficient and effective use of land and the use of suitably located previously developed land and buildings</p> <p>The SA provides the following summary in relation to the site:</p> <p>“The site comprises greenfield land not previously developed land. The site is on the edge of the settlement, some distance from the services and facilities in the town centre. Future residents are likely to rely on the private vehicle to access some of these services which are not within walking or cycling distance. There are bus stops at Boreham Road and Woodcock Road which serve the regular 265 Bath – Salisbury route. The site would involve the permanent loss of BMV land which would be problematic to mitigate given the location of the 3b land and its relationship with the settlement edge. Overall it is considered that the effects on this objective would be moderate adverse”.</p> <p>Whilst the site is not classified as previously developed land, the site benefits from being located on the edge of a sustainable market town, close to many of the services and facilities available in Warminster.</p> <p>The locational suitability and sustainability of the site was clearly acknowledged by the Inspector in his Report on the West Wiltshire District Plan First Alterations when he previously considered the site. Indeed he noted that the site is within maximum desirable walking distances for many of the facilities in the town and commented positively on the proximity to the secondary school, leisure centre and employment opportunities. He recognised that these are destinations that often attract visitors arriving by private car and thus their close proximity to the site has considerable highways and sustainability advantages.</p> <p>In addition, the Council's SHLAA confirms that the site is suitable for development. The site, referred to within the SHLAA as ‘Site 603-Land East of the Dene’ (Appendix 4), is considered deliverable within five years for up to 256 dwellings overall.</p> <p>There are bus stops within 200m of the site on Boreham Road and Woodcock Road, from which there are buses available that provide direct services to the centre of Warminster and Salisbury. The bus stops and shelters on Boreham Road will be improved as a result of a financial contribution that has been agreed between Wiltshire Council and Hallam Land Management. There are regular services between Warminster and Salisbury which stop at ‘Boreham Fields, The Dene’ in both directions and a link with the 264/265 service which provides services to Trowbridge, Bradford-on-Avon and Winsley en route into the centre of Bath. Warminster train station is a walk or short cycle ride of 1.24 miles from the site, from which there are direct services to Bath Spa, Bristol Temple Meads, Salisbury, Trowbridge and London Waterloo. There are therefore considerable benefits in locating development near to the train station where maximum advantage can be made of this attribute.</p> <p>Given its location, the range of services and facilities available within walking and cycling distance, and the opportunities for public transport, the site is considered to represent a suitable and sustainable location for residential development.</p> <p>In response to the ‘assumed’ best and most versatile categorisation of the land by the SA, the pending outline planning application is supported by a Soils and Agricultural Use and Quality Report, which confirms that the agricultural land quality of the site varies between Grades 3a and 3b. However, it should be noted that the land around Warminster generally varies between Grades 1 and 4, although the Grade 4 land is primarily limited by high flood risk which is likely to restrict the potential of those areas for development.</p>				

	Overall, we do not agree that the effects on Objective 2 would be 'moderate adverse'. Given the location of the site, on the edge of the town, with limited brownfield sites available in Warminster to meet the identified housing requirement, we consider that the site is suitably located. We therefore consider a more positive effect as an appropriate conclusion.
Attached files (Please see Objective)	4749818
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.

Comment ID:	3244	Consultee C/O Agent Hallam Land Management Person ID: 645345	Agent Mr Nick Matthews Director Savills Person ID: 1138525	Do you consider the draft WHSAP is legally compliant? No
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified Effective Consistent with national policy
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA objective 3. Use and manage water resources in a sustainable manner</p> <p>The SA provides the following summary in relation to the site:</p> <p>“A capacity appraisal of water supply would be needed to confirm the scope of network reinforcement to serve development proposals. In relation to sewerage, foul water flows to Boreham Road SPS and capacity appraisal would be needed to confirm the scope of any necessary network reinforcement to serve development proposals. Any such appraisal work would need to be tailored to the number of homes proposed on the site. Foul drainage capacity may be an issue in this location. There are also records of complaints of surface water flooding in the area of Grange Road, which is likely to be an issue for this site and would need detailed investigation as part of any planning application. Storm water disposal is also likely to be an issue as soakaways will not work in this location. A connection to the main river to the south may be possible but would require access over third party land. There may be significant additional infrastructure works required to bring this site or part of it forward, which would need to be determined through further appraisal work. Due to the relationship of the site with the SAC, likely significant effects are triggered based on a settlement level HRA screening. Appropriate assessment would be required if the site is taken forward into any subsequent stage of the selection process. Overall it is considered that the effects on this objective would be moderate adverse given that mitigation measures associated with the River Avon SAC as well as the use of soakaways and storm water disposal would be problematic to achieve”.</p> <p>Following the submission of the outline planning application, which was supported by a Flood Risk Assessment and Drainage Strategy, ongoing discussions have been held with Wessex Water and the Lead Local Flood Authority (LLFA) to agree a suitable approach to the drainage of the site.</p> <p>In discussions with the LLFA, the drainage proposals have been revised. The agreed approach comprises a SuDS scheme consistent with local and national policy at the proposed development, including an attenuation pond, along with additional measures such as permeable paving, ditches and swales.</p> <p>The attenuation pond is intended to mimic the greenfield nature of the surface water regime with the new outfall of the site adjacent to the existing access to Home Farm and Bishopstrow Court. From this point, the site currently drains onto Boreham Road southwards, via fields into the River Wylye, and westwards along the Boreham Road to outfall into the River Wylye in the vicinity of Boreham Mill. It is proposed that, a surface water sewer connection will be made to collect the surface water from the site and discharge to the River Wylye through the fields south of Boreham Road.</p> <p>This approach has been agreed with the LLFA given that the River Wylye to the south of the site is the most appropriate receptor of storm water from the site, having the potential to employ source control measures and detention features to control peak discharges to no greater than the baseline conditions. As the site lies above the River Wylye flood plain, there will be no incidents of back flow into the development.</p> <p>The implementation of source control measures through the use of SuDS can provide a 59% betterment in peak run-off from the site. This is a significant positive benefit given the existing baseline conditions, and demonstrates the ability of development to make a significant improvement</p>			

	<p>through mitigation measures. As a result, we do not agree that the effects on Objective 3 would be 'moderate adverse'. On the contrary, we consider that the measures proposed through development of the site would result in a major positive impact.</p> <p>Copies of the relevant consultation responses, confirming agreement to this approach, are attached at Appendix 5.</p>
Attached files (Please see Objective)	4749822
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.</p>

Comment ID:	3245	Consultee C/O Agent Hallam Land Management	Agent Mr Nick Matthews Director Savills	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 645345	Person ID: 1138525	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		SA objective 4. Improve air quality throughout Wiltshire and minimise all sources of environmental pollution The SA confirms that Warminster does not have an AQMA, and supporting information covering air quality has not been requested as part of the pending outline planning application. Overall, it is considered that there would be no adverse impacts, both individually or cumulatively, on air quality as a result of development of the site.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.			

Comment ID:	3246	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
		Person ID: 645345	Person ID: 1138525		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SA objective 5a. Minimise our impacts on climate change – through reducing greenhouse gas emissions</p> <p>The SA provides the following summary in relation to the site:</p> <p>“Minimising the impacts of climate change through reducing greenhouse gas emissions will be possible through the implementation of measures outlined in ‘Delivering strategic objective 2: to address climate change’ and the related ‘Core Policy 41: Sustainable construction and low carbon energy’ of the Wiltshire Core Strategy. These measures will ensure the incorporation of design measures to reduce energy demand and increase energy efficiency, as well as the promotion of low carbon energy sources and encouragement of sustainable building practices. However, the effect of the development of this site will be to increase greenhouse gas emissions overall and on balance this site is considered to have a minor adverse impact in relation this SA objective”.</p> <p>We question the conclusions reached under Objective 5a. As already stated above, the site is situated in a sustainable location, as confirmed by the SA. Given the pressing need to deliver additional housing at Warminster, and the lack of available sites within the town itself, it would follow that the draft Plan should look to identify suitable sites on the edge of the town to accommodate the identified housing need. Locating development on the edge of the town, with good access to services and facilities, is likely to be far more sustainable than the allocation of sites further afield.</p> <p>With regards to the built fabric, we agree that a number of measures can be explored through the development of the site to ensure the incorporation of design measures to reduce energy demand and increase energy efficiency, as well as the promotion of low carbon energy sources and encouragement of sustainable building practices. The adoption of comprehensive and extensive Green Infrastructure will have benefits for climate change.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.			

Comment ID:	3247	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SA objective 5b. Minimise our impacts on climate change – through reducing our vulnerability to future climate change effects</p> <p>The SA provides the following summary in relation to the site: “The site is located in Flood Zone 1, although there is an area within the site that is at risk of surface water flooding, which would need to be investigated and resolved through any subsequent planning application process and informed by a Flood Risk Assessment. Due to the size of the site it is likely that the parts of the site that are vulnerable to surface water flooding could remain undeveloped, or that suitable mitigation could be achieved. Conventional soakaways are unlikely to work effectively in this part of the site, and ground investigations would be required to support and subsequent planning application. Storm water drainage to the River Wylde to the south may also be an issue due to levels, and there may be a need to look at surface attenuation methods which would reduce developable area. Overall it is that the effects on this objective are minor adverse”.</p> <p>As already stated under our response to Objective 3 above, a drainage strategy for the site has already been agreed as part of the current outline planning application, and the proposals have been found acceptable by the LLFA. Copies of the relevant consultation responses demonstrating this are attached at Appendix 5.</p> <p>Not only will the surface water strategy reduce runoff rates, but it will reduce it considerably below existing levels. Indeed, there is anticipated to be a 59% decrease in runoff water. Furthermore, the development proposals would result in the planned discharge of the (reduced) residual runoff through off-site drainage improvements. In contrast to the conclusions of the SA, it is considered that the development would result in a major positive impact.</p>			
Attached files (Please see Objective)		4749822			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.			

Comment ID:	3248	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SA objective 6. Protect, maintain and enhance the historic environment</p> <p>The SA provides the following summary in relation to the site:</p> <p>“The site adjoins the Bishopstrow Conservation Area on its east and south sides, and there are also a number of Listed Buildings within proximity to the site, including the Grade II Listed Bishopstrow House Hotel to the east. A Historic Impact Assessment would be required as part of any future planning application to determine the impacts of development on the heritage assets of the area to avoid harm to the significance of heritage assets from adverse impacts on their settings and in particular to maintain as much as possible of the character of the approach to the town along Boreham Road which is a particular local feature. Overall it is considered that the effects on this objective would be moderate adverse and mitigation would be problematic”.</p> <p>Ongoing discussions have been held with the Council in relation to potential heritage impacts of the outline application proposals. Comments were received from the Council’s Archaeological Officer on 9 December 2016, stating that given the significance of heritage assets, archaeological trial trench evaluation work is necessary. As a result, trial trenching has been undertaken and a summary report submitted to the Council. Following this, the Council’s Archaeological Officer (Rachel Foster) confirmed on 28 April 2017 and 30 May 2017 that the content of the report is acceptable and that there is no evidence to indicate significant remains (of national importance) which would preclude development of the site, and that necessary mitigation measures can be secured by condition. A copy of the confirmation is attached at Appendix 6.</p> <p>It is acknowledged that the Council’s Conservation Officer has expressed concerns with the perceived impact of the outline application proposals on heritage assets. However, whilst there is agreement that the potential harm to the heritage assets falls within the ‘less than substantial range’, we remain of the opinion that this harm is ‘low’ within the less than substantial range.</p> <p>The application plans have followed an iterative design process, evolving over a considerable period of time and have sensitively responded to comments received during pre-application discussions, including a public consultation event. Furthermore, the submitted layout has been designed to be sympathetic to, and compatible with, the heritage assets. The principles are that built development would be located some distance from the Conservation Area and that new housing would be set back behind new green space and planting. Along with the adoption of well-designed locally distinct new housing this would create a sensitive and attractive interface between the development and the Conservation Area. It should also be noted that future Reserved Matters applications covering layout, scale, appearance and landscape can develop these principles further to ensure a positive integration with the site’s setting. This is recognised in the SA which itself confirms that “there may be adverse effects but some aspects would seem capable of mitigation”.</p> <p>In direct response to the potential heritage impacts set out within the SA, it should be noted that visibility towards the site from Bishopstrow House is restricted by extensive mature woodland around the perimeter of the house and within the gardens. For much of the landscape around Bishopstrow House, views of the site are prevented and obscured by the intervening woodland within the curtilage of the building. Where there are occasional views, such as from the car park, these are restricted to the southern parts of the site and include views of properties at Grange Lane. The existing mature tree cover within the grounds of the house, coupled with proposed new planting along the eastern edge of the site as</p>			

	<p>part of the application proposals would filter and 'soften' views of the built form where glimpsed views remain, thereby minimising the visual impact on the setting. The magnitude of the impact on setting and significance would further reduce over time as a result of additional green infrastructure and the maturing of habitats as part of application proposals.</p> <p>In addition, the outline application proposals incorporate a significant green corridor along the eastern boundary of the site and the proposed development area has been 'pulled away' from Boreham Road along the southern boundary of the site to respond to the adjacent Conservation Area (See Landscape Framework Plan attached at Appendix 7).</p> <p>Overall, we are of the view that the development of the site has been designed to be sympathetic to, and compatible with, the Conservation Area and adjacent heritage assets. Furthermore, the benefits associated with the development outweigh any potential harm to the heritage assets in accordance with NPPF paragraphs 134 and 135.</p> <p>We therefore disagree with the SA conclusion that the effects of this objective would be moderate adverse and that mitigation would be problematic. Further details of our justification for the development of the site on heritage grounds is contained within Appendix 8, comprising the Heritage Impact Assessment and subsequent statement from Orion Heritage on 19 December 2016 in connection with the outline planning application. Consistent with these reports, we consider that the impact would be minor adverse at worst.</p>
Attached files (Please see Objective)	4749817 / 4749825 / 4749826
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.

Comment ID:	3249	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SA objective 7. Conserve and enhance the character and quality of Wiltshire's rural and urban landscapes, maintaining and strengthening local distinctiveness and sense of place</p> <p>The SA provides the following summary in relation to the site: "The site comprises a number of fields which are open in character with limited boundary screening. The site is a strong visual setting for this part of Warminster, and there are issues that development would erode the gap between Warminster and Bishopstrow. A substantial buffer would be required to Bishopstrow House, with only western parts of the site capable of delivering development without likely significant effects on the landscape setting on this part of the town. The level of effect of development would depend on design and employment of appropriate mitigation such as the retention of hedgerows and mature vegetation where possible, and to what degree the site was developed. The site contains and adjoins public footpaths WARM40 and WARM41 which would need to be protected and enhanced through any future development of the site. Given the size of the site, a degree of mitigation or reduction in developable area to address landscape impacts is likely to be achievable, although the development area may be limited to the western parts of the site. With regard to SA Objective 7 the effects are judged to be minor adverse".</p> <p>It is considered that the current outline planning application proposals respond to the objectives of the SA in relation to landscape and built character and have full regard to the sites setting.</p> <p>The site and the local landscape is not subject to any landscape quality designation at either national and local level. The site has the benefit of being located within the context of the existing settlement edge such that new development would be observed within that context. The site's landscape features such as the veteran trees, mature trees and hedgerows and rights of way are all conserved within areas of green space and form key elements of the design. Additional planting, green space and habitat creation around the perimeter of the site will strengthen these habitats and would successfully assimilate the built form within its landscape and built context. In particular, the application proposals incorporate a significant green corridor along the northern and eastern boundaries of the site, and development has been 'pulled away' from Boreham Road along the southern boundary of the site to respond to the adjacent Conservation Area (See Development Framework Plan attached at Appendix 9).</p> <p>With regards to the degree of 'buffer' required to Bishopstrow House, the application proposals incorporate a significant area of green infrastructure, along with retention of hedgerows and mature vegetation, that would create an attractive well-designed gateway and a sympathetic response to the surrounding context of Bishopstrow House.</p> <p>The Design & Access Statement supporting the outline planning application provides the overarching design principles for the development. These respond to local distinctiveness and aim to develop a sense of place through the placemaking process. This includes:</p> <p>1) Creating a high quality residential development that is well related to its setting in terms of scale, appearance, materials and colours, and to have regard to the setting of surrounding properties, the adjacent Conservation Area and Battlesbury Hill; and</p>			

2) To take reference from examples of good urban design, as well as taking inspiration from local character and vernacular that can be found within and around Boreham, Bishopstrow and Warminster. These can be developed further, with the Council, through reserved matters applications.

In relation to the perceived potential impacts of development in 'eroding a gap' between Warminster and Bishopstrow, when entering or exiting Warminster, the distinction between the two settlements in heritage terms is not readily legible. It is considered that the distinction between the settlements is already blurred, especially as the main village at Bishopstrow is to the south rather north of the B3414. Any sense of separation between Warminster and Bishopstrow can only be experienced when the site is viewed from the high ground in the vicinity of Battlesbury Hill to the north. Looking back towards the settlement, this is restricted to a small and rather inconsequential 'gap' between the housing surrounding the military base and Bishopstrow House. However, what is plainly apparent is that the site forms a small part of the more extensive panorama of the wider urban area of Warminster that is visible within the valley, and that built development would be seen within that context.

We consider that the conclusions reached by the Inspector, and supported by the Secretary of State, in the appeal decision for Land at Boreham Road, Warminster, BA12 9JP (APP/Y3940/W/16/3150774), are directly comparable to the Land East of the Dene, given the proximity to the appeal site and similar circumstances. It is important to note that the appeal decision states:

"The degree of physical separation of the appeal site from Bishopstrow and the level of screening that would be afforded to the proposed development would prevent any unacceptable impression of coalescence between it and Warminster. The proposed development would be so well removed and screened from Bishopstrow College as to have no significant impact on it and there is no reason why a sensitively designed development would have any adverse impact on Boreham Mill from which it would be well screened".

"there would be no harm to the character and appearance of the area generally or through creating unacceptable coalescence between Warminster and Bishopstrow".

A copy of the appeal decision is attached at Appendix 10.

Further evidence on landscape can be found in the Council's own Site Landscape Assessment, which provides a positive summary on the potential for development on the site. Furthermore, the planning application proposals incorporate a significant level of open space and green infrastructure, over and above that required by the Council's planning policies, this demonstrates the potential of the site to deliver the benefits outlined under objective 7.

In conclusion, we consider that the SA overstates the degree of harm resulting from the allocation and that the combination of the proposed mitigation and considerable landscape and open space enhancements that can be delivered provide benefits for the community that result in a neutral impact overall.

Stage 4a Site Landscape Assessment - Part 2: Salisbury, Tidworth, Trowbridge, Warminster and Westbury Community Areas

The Council's Stage 4a Landscape Assessment provides a positive summary on the potential for development on the site, referred to within the Assessment as 'Site: 603 Land East of The Dene'.

Firstly, in relation to 'remoteness and tranquillity judgement', the Assessment confirms that the site is considered to be located in an area considered as "Some interruption", as opposed to remote or peaceful. In addition, the Assessment confirms that the site benefits from a level of screening given that "the site is enclosed to the west, east and south by built form and vegetation".

In relation to 'mitigation measures and capacity to accommodate change', the Stage 4a Site Landscape Assessment provides a positive summary for the site, stating on page 60 that "however, proposed development would be less constrained in the north west and south west of the site due to the proximity of existing development and the lower sensitivity in terms of wider landscape setting and views. Boundaries to development could be planted with groups of trees, copses and individual specimen trees to help mitigate the effect on landscape character and views. The northern and eastern parts of the site would be more sensitive to development due to the proximity of the Conservation Area and views north towards Battlesbury Hill".

The report clearly sets out the design and mitigation measures that need to be adopted, such as the planting of "groups of trees" around the site boundaries, which are embraced by the application proposals. The application shows that built development would be located alongside and within the context of existing housing and is set within a green infrastructure framework. This includes broad areas of open space and broadleaved planting around the northern and eastern parts of the site that would minimise effects on landscape character and visual amenity.

	<p>The planning application included a Landscape & Visual Appraisal (LVA). As recorded by the Council's Landscape Officer in her response: "...It is the appropriate level of assessment for this development and has been prepared to best practice and the guidelines published by the Landscape Institute". A copy of the consultation response is attached at Appendix 13.</p> <p>The LVA explored landscape character and visual amenity and assessed the resulting landscape and visual effects of the Proposed Development on the receiving landscape and visual receptors. The LVA states that:</p> <p>"In conclusion, it is assessed that the site's landscape character has the ability in which to absorb development of the scale and type proposed, as presented by the Framework Plan, without causing any unacceptable long term landscape and visual harm. The Proposed Development of well designed locally distinct new homes, attractive streets and a varied GI of open space and new planting is considered to be an appropriate design approach within this landscape context."</p> <p>The Officer concluded that: "On the whole I agree with the assessment judgements".</p>
<p>Attached files (Please see Objective)</p>	<p>4749816 / 4749820 / 4749823</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.</p>

Comment ID:	3250	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
		Person ID: 645345	Person ID: 1138525		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SA objective 8. Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures</p> <p>The SA provides the following summary in relation to the site: “The whole SHLAA site provides capacity for approximately 163 residential units (though this may be reduced through the mitigation set out in this assessment). Development of the would contribute towards Wiltshire’s housing supply as well as boost the local supply of affordable houses in accordance with national policy and local plan policy requirements. Other policies in the Core Strategy also require a mix of housing by affordability, tenure and size. Overall the effects on this objective are considered to be moderate positive”.</p> <p>We agree entirely that there would be a positive impact as a result of the provision of a mix of housing to meet the identified housing need for the town. This is particularly important given that the made Warminster Neighbourhood Plan does not allocate land, and therefore does not deliver certainty of supply in the local area to meet residual housing needs. Therefore it will be appropriate to allocate additional land for housing through the Housing Site Allocations Plan to meet requirements over the remainder of the Core Strategy plan period.</p> <p>We also agree that the provision of a mix of housing types, along with 30% affordable housing, should be considered a significant benefit. Indeed, providing a choice and range of housing sites at Warminster to meet future housing needs will not only increase certainty over the future delivery of growth but will also provide choice for house purchasers.</p> <p>In this context we consider the development would have a major, as opposed to moderate, positive impact.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.			

Comment ID:	3251	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
		Person ID: 645345	Person ID: 1138525		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>SA objective 9. Reduce poverty and deprivation and promote more inclusive and self-contained communities</p> <p>Whilst we agree with the conclusions of Objective 9, that development of the site would reduce poverty, deprivation and promote more inclusive and self-containment within the community, we do not agree with the overall conclusions that the development would result in a moderate adverse effect.</p> <p>The SA states that “In terms of secondary education, there is no capacity to expand Kingdown on its existing site and no immediate prospect of an expansion site being secured and delivered since it is wholly dependent on other development in the town”.</p> <p>We strongly recommend the Council review the response provided by the School Places Planning Officer on 17 November 2017. This confirms that whilst the school currently has no spare capacity, “the Council intends to substantially expand the school”.</p> <p>The consultation response, attached at Appendix 11, goes on to state that “As Kingdown is effectively already full, we require a developer contribution towards the provision of the 27 places that this development requires. The contribution will be secured by S106 to which standard payment terms will apply, and subject to appropriate indexation, there are currently four S106s pooled towards the first phase of expansion at Kingdown Academy, with one in the process of being completed. However, a second phase of expansion at the school will also be needed to accommodate continuing demand from new housing, necessary, and so further S106s will be secured to fund it, and this site will be one of those Phase 2 contributors”.</p> <p>Therefore, contrary to the conclusions of the SA, we consider that the development of the site would provide a significant benefit in enabling contributions towards a Phase 2 expansion of the school which the Council itself has already identified. As a result, it is considered that the development would result in a positive impact.</p>			
Attached files (Please see Objective)		4749815			
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?		To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.			

Comment ID:	3252	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
		Person ID: 645345	Person ID: 1138525		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>SA objective 10. Reduce the need to travel and promote more sustainable transport choices</p> <p>The SA provides the following summary in relation to the site:</p> <p>“The site is in an edge of town location, and there are few shops and other facilities available nearby, although there are primary and secondary schools close to the site. The site is over 2km from the rail station and whilst within a reasonable cycling distance, it is not a reasonable walking distance. There are bus stops close to the site at Boreham Road and Woodcock Road serving the reasonably regular 265 Bath – Bradford on Avon – Trowbridge – Westbury – Warminster – Salisbury route. Future residents are still likely to rely on the private vehicle to access services and facilities from this location. It may be possible to provide pedestrian linkages to the local PROW network. Development in this location provides for reasonable accessibility to a range of services and facilities, and there is scope that some future residents will be able to make sustainable choices about their mode of travel. Overall it is considered that the effects on this objective are minor adverse”.</p> <p>In the same way as outlined for our response under objective 5a, we question the conclusions reached for this objective given the site is situated in a sustainable location. Indeed, given the pressing need to deliver additional housing at Warminster, and the lack of available sites within the town itself, it would follow that the draft Plan should look to identify suitable sites on the edge of the town to accommodate the identified housing need. The sustainable credentials of the site are supported by the consultation response to the outline planning application provided by the Council’s Highways Officer, dated 3 February 2017, which stated that:</p> <p>“Taking all these points into account together with the walking and cycling distances to local schools and retail facilities the development can be considered sufficiently sustainable in transport terms”.</p> <p>A copy of the consultation response is attached at Appendix 12. It is also important to note that the Council’s Highway Officer supports the application proposals, the consultation response for which is also attached at Appendix 12.</p> <p>In addition, the recent Secretary of State appeal decision for Land at Boreham Road, Warminster (APP/Y3940/W/16/3150774), confirms the sustainable credentials for this general location, by stating that “although it would not be on the side of Warminster where most new development is to occur it would be on a site reasonably well located in relation to existing development in the town and with reasonable non-car accessibility to the town centre”. With this in mind, we consider the SA should instead conclude that the allocation would have a minor positive impact on this objective as opposed to a minor negative.</p>				
Attached files (Please see Objective)	4749821				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.				

Comment ID:	3253	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management	Savills	Do you consider the draft WHSAP is sound?	No
Person ID: 645345			Person ID: 1138525		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA objective 11. Encourage a vibrant and diversified economy and provide for long-term sustainable economic growth We agree with the conclusion set out in the SA which confirms that the allocation of the site would “boost the number of homes and thereby increase the population of the area”, which as a result would “potentially directly assist in the support of local retail, leisure and employment uses, including the various Principle Employment Areas in Warminster and the planned further 6ha employment land at the West Urban Extension”. This would be in addition to the direct and indirect construction employment which would be generated which would help stimulate the local economy. We therefore agree with the conclusion that the effects on this objective are considered to be positive.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.				

Comment ID:	3254	Consultee C/O Agent	Agent Mr Nick Matthews Director	Do you consider the draft WHSAP is legally compliant?	No
		Hallam Land Management Person ID: 645345	Savills Person ID: 1138525	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.7		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	SA objective 12. Ensure adequate provision of high quality employment land and diverse employment opportunities to meet the needs of local businesses and a changing workforce We agree with the SA in concluding that the allocation of the site could help to support the vitality and viability of the services and employment in Warminster, and that the effects on this objective are considered to be positive.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	To provide clarification relating to changes required to Policy H2.7 (East of the Dene, Warminster) to ensure the Plan is sound and to assist the Inspector with any additional information which may be relevant.				

Comment ID:	3255	Consultee Ms Moria Barton Person ID: 1138571	Agent Mrs Janet Montgomery Brimble, Lea and Partners Person ID: 438199	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.65				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>This representation should be treated as an objection to Shrewton being discounted as a location for housing site allocations and, in particular the suitability and availability of an area of land off Elstone Lane in Shrewton outlined red on the plan enclosed with this representation (drawing no. 17146-1).</p> <p>It has been noted from the Amesbury Community Area Topic Paper June 2017 that SHLAA Sites in Shrewton were rejected at the Stage 3 of the site selection process with the stated reasons in table 6.5 as mainly being because of major adverse effects associated with River Avon SAC and water and sewer constraints (with some minor variations between sites).</p> <p>On this basis, the Habitat Regulations Assessment (HRA) June 2017 has been reviewed to provide an insight for these summary reasons for rejecting the sites at Stage 3. In the case of Shrewton, the settlement level screening assessment (Table 4) identifies the Likely Significant Effects (LSE) which are addressed below.</p> <p>Salisbury Plain Special Protection Area (SPA) – Criterion R1 Shrewton has been discounted at Stage 3 on the basis that the settlement is within 6.4km of the Salisbury Plain SPA, being the distance where the majority of visitors to the SPA originate. However, this reason cannot be substantiated on the basis that Warminster is also within 6.4km of the SPA where a significant amount of new development is being focused. This will have a much greater impact than the level of development that could be achieved in Shrewton, and analysis elsewhere in the HRA and the Sustainability Appraisal demonstrates that there is scope to mitigate the impact of any additional recreational pressure upon the SPA. There is no evidence to suggest that the Stone Curlew Mitigation Strategy identified in the Core Strategy, which was developed for the established housing requirements and is not changing as a result of this Site Allocation Plan, would be ineffective. As such, development in Shrewton as a matter of principle will not have a LSE on this SPA.</p> <p>River Avon Special Area for Conservation (SAC) – Criterion H2 The identified LSE of development in Shrewton on this SAC is flawed on the basis that Policy CP69 of the Core Strategy states that impacts are most likely to occur on developments within 20m of the river but the Stage 3 assessment then incorrectly assumes that development at settlements within 20m of the River Avon SAC could lead to LSE. This incorrect assumption is confirmed in the summary of screening assessment results where it states that the potential impacts of development in such settlements would be entirely site specific. Again, Warminster (and Salisbury) are settlements within 20m of this SAC but have not been discounted at Stage 3, and it is unreasonable to cherry pick the inclusion or exclusion of settlements for the purposes of the HRA.</p> <p>Water Abstraction – River Avon SAC – Criterion W1 The LSE has identified a number of settlements but singles out any development in Shrewton as it is likely to contribute towards reduced flows which would consequently cause an unfavourable condition of the River Till. The HRA acknowledges that the impact on flows is based on Wessex Basin Ground Water Model (2016) which was based on an assumption of full uptake of private water supply licensed abstractions, but this does not reflect the recent actual abstraction rates in the area. Mitigation can be</p>			

	<p>achieved to the local water supply network if necessary, as being applied to the allocation at Durrington. It is therefore inappropriate to discount Shrewton as a location for some development owing to potential mitigation if necessary to prevent any LSE.</p> <p>Site Specific Assessment of Land at Elstone Lane</p> <p>In the first instance, it should be noted that The Parish of Shrewton has published a Draft Neighbourhood Plan on their website (dated August 2016). This includes the results of a housing need survey which revealed that 89.1% of those who responded to the survey support the provision of new housing, and states that a development of 53 dwellings would be expected to deliver the identified need for affordable housing. Even more housing may be required to deliver some of the Parish's other objectives in the Draft Plan (i.e. redevelopment of the village hall and enhanced recreational facilities). As such, Wiltshire Council's decision to discount any development in Shrewton through the Site Allocations Plan is unreasonable and unsustainable. The analysis further above demonstrates that development of this site in Shrewton will not have any LSE on the River Avon SAC and that water abstraction can be mitigated if necessary. A suitable drainage scheme would ensure that there would not be any pollution.</p> <p>The site is being made available by the landowner for housing development and it is suitable for housing on the basis that it relates well to the settlement and is in a sustainable rural location. Importantly, there are no specific policies in the Core Strategy or National Planning Policy Framework which indicate that development should be restricted on this site. The site is currently occupied by a private manège and therefore constitutes previously developed land. There is an existing vehicular access to the site which is safe and suitable for housing as a matter of principle although this would be demonstrated further during the decision-making process in respect of an application to develop the site.</p> <p>Any development proposal would be required by national and local planning policies to demonstrate with evidence that there is sufficient infrastructure in place (e.g. highways, education, health, sewerage, water supply etc) and, if necessary, capacity can be secured through the planning process. This would be covered by specific criteria in a site allocation policy.</p> <p>Any potential adverse effects can be fully mitigated through detailed assessment and, where appropriate, the imposition of conditions and provision of planning obligations through the development management decision-making process.</p> <p>At present, the absence of any housing site allocations in Shrewton is unjustified. For the above reasons, there is no justified basis to discount Shrewton for housing site allocations and there are no likely significant effects. As such, the Council should re-assess their pre-submission position regarding Shrewton and re-run Stages 3 and 4 of the site selection process within the Amesbury Community Area, with this newly identified site included for consideration.</p>
<p>Attached files (Please see Objective)</p>	<p>4750527</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>There should be an opportunity to present expert evidence to challenge the Council's conclusion on LSE</p>

Comment ID:	3256	Consultee Robert Hitchens Ltd Person ID: 841197	Agent Sarah Hamilton-Foy Pegasus Planning Group Person ID: 397761	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not: Positively prepared Effective Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.		2.12		
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Robert Hitchins Limited do not support the Plan and consider that there are grounds to increase the housing requirement to reflect the OAN as since the Core Strategy Examination there is no longer the evidence to support the constrained housing requirement. At the Core Strategy Examination there was considerable debate over the OAN. The Inspector in examining the Wiltshire Core Strategy (Sept 2014) recommended :-</p> <p>An increase in the minimum number of houses to be provided over the plan period, from 37,000 to at least 42,000 and revisions to their distribution;</p> <p>A commitment to partially review the Core Strategy to enable an adequate development plan basis for decision making over the plan period to 2026;</p> <p>a commitment to produce additional Development Plan Documents to ensure the effective delivery of necessary development. Such documents will include a Housing Sites Allocation DPD, a Gypsy and Traveller DPD based upon updated needs evidence and a Chippenham Site Allocation DPD;</p> <p>The Inspector acknowledged that "Overall, the balance of evidence suggests that the objectively assessed housing need, to be disaggregated across the three Wiltshire HMAs, is currently in the region of 44,000 dwellings over the plan period."</p> <p>Paragraph 47 of the NPPF requires that the full objectively assessed needs for market and affordable housing (OAN) is met within the Housing Market Area (HMA) as far as is consistent with the policies set out in the NPPF.</p> <p>The Wiltshire Core Strategy Inspector issued a letter on 2nd December 2013 (large parts of which are maintained in his Final Report) which identified that the OAN was in the region of 44,000 dwellings over the plan period. Nevertheless, the Inspector went on to accept a housing requirement of 42,000 dwellings.</p> <p>The High Court Judgment of <i>Jelson Limited vs Hinckley and Bosworth Borough Council et al</i> [2016] EWHC 2979 (Admin), defines what is meant by the terms OAN and housing requirement in paragraph 41, as follows:</p> <p>"Full Objective Assessment of Need for Housing: This is the objectively assessed need for housing in an area, leaving aside policy considerations. It is therefore closely linked to the relevant household projection; but it is not necessarily the same. An objective assessment of housing need may result in a different figure from that based on purely demographics ...</p> <p>Housing Requirement: This is the figure which reflects, not only the assessed need for housing, but also any policy considerations that might require that figure to be manipulated to determine the actual housing target for an area. For example, built development in an area might be constrained by the extent of land which is the subject of policy protection, such as Green Belt or Areas of Outstanding Natural Beauty. Or it might be decided, as a matter of policy, to encourage or discourage particular migration reflected in demographic trends. Once these policy considerations have been applied to the figure for full objectively assessed need for housing in an area, the result is a "policy on" figure for housing requirement. Subject to it being determined by a proper process, the housing requirement figure will be the target against which housing supply will normally be measured."</p>			

	<p>This identifies that a policy-on housing requirement can be different from the policy-off OAN to achieve particular policy objectives, such as protecting environmental assets or preventing unsustainable cross- boundary relationships. However, in Wiltshire no such policy objective was fulfilled through the adoption of a housing requirement below the OAN. The reasons were in effect that:</p> <ul style="list-style-type: none"> the OAN could not be achieved; the Council could not demonstrate a five-year land supply against the OAN; the OAN was not assessed as being the preferred option through the Sustainability Appraisal; and the Council were committed to rapidly reviewing and responding to the OAN. <p>However, none of these reasons can now be justified (as described below) and so there can be no reason for not meeting the full OAN as required by paragraph 47 of the NPPF</p> <p>The OAN could not be achieved</p> <p>Wiltshire delivered in excess of the annualised housing requirement in 2013/14 and in 2014/15, even in the absence of allocations prior to 2015. This clearly demonstrates that the adopted housing requirement can be sustainably exceeded. Indeed, now that the Strategic Allocations of the Core Strategy (and the Chippenham Site Allocations Plan and Neighbourhood Plans) are delivering it would be expected that these rates of delivery would increase significantly. This entirely undermines the previous evidence presented to the Inspector examining the Wiltshire Core Strategy that such rates of development were unachievable.</p> <p>2. The Council could not demonstrate a five-year land supply against the OAN</p> <p>Based on the Council's figures and method of calculation, the Council would currently be able to identify a five-year land supply against a housing requirement of 46,158 dwellings (7,440 in East Wiltshire HMA; 27,898 in North and West Wiltshire HMA; 10,820 in South Wiltshire HMA) in addition to the allowance for 900 dwellings at the West of Swindon. The adopted housing requirement can therefore be increased to reflect (or even exceed) the OAN in accordance with the NPPF.</p> <p>3. The OAN was not assessed as being the preferred option through the Sustainability Appraisal</p> <p>The Sustainability Appraisal (SA) has evolved since the adoption of the Core Strategy, and this has been used to inform the Housing Site Allocations Plan which proposes to deliver circa 46,600 dwellings.</p> <p>4. The Council were committed to rapidly reviewing and responding to the OAN</p> <p>The Inspectors Final Report relied upon the Council producing a new SHMA by early 2016 (see paragraph 81). This would have enabled the Council to respond positively to address the identified needs through the planned early review of the Core Strategy. However, in the intervening 3 years, no such SHMA has been produced and published and there has been no progress on the early review of the Core Strategy. In fact it is noted that the Council have recently considered a revised Local Development Scheme at the Cabinet meeting on 12th September and the partial review of the Core Strategy is replaced by the Wiltshire Local Plan Review. However, it remains self-evidently the case, that the Council have not re-assessed needs and responded appropriately. The continued reliance upon the commitments of the Council to identify and address the OAN should not be afforded weight, given that the previous commitments have not been fulfilled.</p> <p>Based on the preceding analysis, there is no evidence and no justification for not meeting the OAN in full in Wiltshire, as required by paragraph 47 of the NPPF. The Housing Site Allocations Plan should therefore seek to deliver the OAN of 44,000 dwellings. Such an approach would be wholly consistent with the housing requirement of the Core Strategy which requires the delivery of at least 42,000 dwellings.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Pegasus on behalf of Robert Hitchins Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.</p>

Comment ID:	3257	Consultee Robert Hitchens Ltd Person ID: 841197	Agent Sarah Hamilton-Foy Pegasus Planning Group Person ID: 397761	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Table		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared Consistent with national policy	
Please identify the policy, paragraph, table, figure or site to which you are referring.	2.1				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Robert Hitchens Limited do not support the Plan.</p> <p>Further to our representations in respect of paragraph 2.12 i.e.. that the Inspector should use the OAN of 44,000 dwellings because the housing requirement in the Core Strategy is phrased as “at least”; this would be consistent with national policy, and as evidenced in the recent documentation it is achievable because the difference between the OAN of 44,000 and the housing requirement is largely accounted for. It would only leave the opportunity for a few allocations in each of the HMAs in accordance with the settlement strategy. The OAN for the North and West Wiltshire HMA would be 25,918 assuming the same distribution between the HMAs i.e. $44,000/42,000 \times 24,740 = 25,918$</p> <p>The supply for North and West Wiltshire HMA of 27,450 dwellings (Table 4.7) can be reduced by the following:</p> <ul style="list-style-type: none"> Delete saved Local Plan allocations in the HMA i.e. 446 dwellings Delete the inclusion of the brownfield sites to avoid double counting (only one in the HMA is Warminster) 35 dwellings Recalculate windfalls (i.e. critique of WC methodology) reduce total number of windfalls in HMA by 977 Delays to Ashton Park and a strategic site in Chippenham (this arose at the recent Lynham appeal) i.e. 385 dwellings <p>Therefore, the supply of 27,450 is reduced by 1,843 (i.e. total from bullet points above) = supply equals 25,607 dwellings</p> <p>Therefore against the new housing requirement of 25,918 the supply is 25,607 and therefore there is a shortfall of 311 dwellings in the North and West Wiltshire HMA..</p> <p>Against the new housing requirement of 25,918 the supply is 25,607 and therefore there is a shortfall of 311 dwellings in the North and West Wiltshire HMA</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Pegasus on behalf of Robert Hitchens Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan				

Comment ID:	3258	Consultee Robert Hitchens Ltd Person ID: 841197	Agent Sarah Hamilton-Foy Pegasus Planning Group Person ID: 397761	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	2.19			Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Pegasus on behalf of Robert Hitchins Limited do not support the Plan and have the following objections in respect of housing supply. Para 2.19 sets out the number of sources of supply to meet the new homes requirements of Core Policy 2. The Council have identified the developable supply in the CA Topic Papers and in Table 4.9 of the draft Plan. However, the Council have not identified the individual components that make up this supply and as such the total figures in Table 4.9 cannot be relied upon. The necessary evidence should have been made available for this consultation, and will be required prior to examination. Pegasus Group reserve the right to submit detailed representations on this when the necessary evidence is made available.</p> <p>The latest assessment of the developable supply which is available is contained in the Wiltshire Housing Land Supply Statement Update March 2017 (HLSS). It is useful to consider some of the components of supply identified in this report in order to assess the robustness of the Councils current unpublished assessment.</p> <p>However, there are a number of sources of supply in the HLSS which should not be relied upon to deliver as outlined below.</p> <p>Windfall allowance</p> <p>The Draft Plan includes a windfall allowance based on the previous delivery of previously developed sites. This source of supply is in itself uncertain, but it is useful as an indication of what would be delivered if previous rates of delivery were able to be maintained. There are however, two methodological flaws in the approach the Council take to calculating the windfall allowance.</p> <p>Firstly, the Council propose to allocate at least one previously developed site (at Chapmanslade) which would otherwise have been classified as windfall development. The inclusion of this site as an allocation as well as maintaining the windfall rates results in double counting. This makes only a minor difference of 35 dwellings.</p> <p>Secondly, the Council have changed their methodology for calculating the windfall allowance since the examination of the Wiltshire Core Strategy. At that time, the Council assumed that small sites would deliver circa 575 dwellings and that large sites would deliver circa 364 dwellings totalling 939 dwellings within five years. However, the Council now assume that there will be 1,611 windfall dwellings within five years. This has been calculated using a consistent methodology for calculating the small site allowance (although based on a different period) from which it can be calculated that the Council now assume that circa 1,036 dwellings will be delivered on previously developed large windfall sites. This is despite the fact that the Council do not have any evidence that there is sufficient capacity on such sites to deliver this level of housing. Indeed, at the time of the examination the Council identified a total potential capacity of only 364 dwellings (and some of these may have subsequently gained consent and so be included in the developable supply already).</p> <p>The approach of the Council in regards to the large windfall allowance relies upon the delivery of a level of dwellings for which there is no evidence that there is the requisite capacity. Indeed, the Council rely upon the trends of large windfall development in recent years, but this is inevitably hugely variable and a single large windfall development can have a disproportionate effect on the average.</p> <p>Saved Local Plan Allocations</p>			

The Council continue to rely upon the delivery of saved Local Plan allocations in the HLSS. This includes sites which were allocated in the North Wiltshire Local Plan in June 2006, the Salisbury District Local Plan in June 2003, and the West Wiltshire District Plan 1st Alteration in June 2004. Despite the fact that these sites have been allocated for development for between 11 and 13 years, there has been no progress towards site delivery.

In the North Wiltshire Local Plan saved local plan allocations are:
 Quemerford House and Mill {10 dwellings}
 Foundary Lane, Chippenham Town {250 dwellings}
 Works, Cocklebury Road, Chippenham Town {66 dwellings}
 AB Haulage Contractors, 14 Happy Land, Ashton Keynes, Malmesbury Community Area remainder {5 dwellings}

In the West Wiltshire Local Plan saved local plan allocations are:
 Land adjacent to Westbury Hospital, Westbury Town {25 dwellings}
 Station Road, Westbury Town {90 dwellings}

The record of delivery of sites needs to be taken into account when assessing the availability of sites as set out in the NPPG (3-020). These saved allocations have an extensive record of non-implementation and against this background the certainty of any delivery from these sites is limited. Accordingly, in accordance with the NPPG these sites should not be relied upon to deliver.

Newly Arising Information

It is understood that new information in relation to the delivery of some sites has been made available to the Council, including through recent planning inquiries. By way of example, a new trajectory for Ashton Park was provided to the recent Lyneham inquiry since the publication of the Draft Plan. This identifies that this allocation will deliver 300 fewer homes during the plan period.

The Inspector in this case also considered that the trajectories for some other sites were overly optimistic and these should also be delayed, which is likely to further reduce the developable supply. The effects of these necessary adjustments to the identified supply cannot be identified in full until the supporting evidence is made available. Nevertheless, based solely on this analysis, it is clear that the supply relied upon by the Council is overly optimistic. Indeed, it is estimated that the above would reduce the developable supply by circa 3,734 dwellings. With a detailed site specific analysis, it is likely that the supply would be even lower. Table 4.7 of the Draft Plan identifies that with the proposed allocations and including an allowance for windfall, it is expected that 45,639 dwellings will be delivered across the plan period, although an additional 950 dwellings will be provided to the west of Swindon. However, with the removal of at least 3,734 dwellings this would amount to only 41,905 dwellings to meet the requirements of Wiltshire in addition to the 950 dwellings at the west of Swindon. This would marginally exceed the adopted housing requirement but would be over 1,000 short of meeting the OAN, even if every site delivered on schedule.

The effect of the above is that the plan cannot be justified and effective or consistent with National Policy and consequently does not satisfy the tests of soundness.

The supply for North and West Wiltshire HMA of 27,450 dwellings (Table 4.7) can be reduced by the following:
 Delete saved Local Plan allocations in the HMA i.e. 446 dwellings
 Delete the inclusion of the brownfield sites to avoid double counting (only one in the HMA is Warminster) 35 dwellings
 Recalculate windfalls (i.e. critique of WC methodology) reduce total number of windfalls in HMA by 977
 Delays to Ashton Park and a strategic site in Chippenham (this arose at the recent Lynham appeal) i.e. 385 dwellings
 Therefore, the supply of 27,450 is reduced by 1,843 (i.e. total from bullet points above) = supply equals 25,607 dwellings
 Therefore against the new housing requirement of 25,918 the supply is 25,607 and therefore there is a shortfall of 311 dwellings.
 The text and tables relating to the housing land supply should be amended accordingly.

Attached files (Please see Objective)

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Pegasus on behalf of Robert Hitchins Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.

Comment ID:	3259	Consultee Robert Hitchens Ltd Person ID: 841197	Agent Sarah Hamilton-Foy Pegasus Planning Group Person ID: 397761	Do you consider the draft WHSAP is legally compliant? Yes
				Do you consider the draft WHSAP is sound? No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.1 - 3.4		Effective
				Consistent with national policy
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Robert Hitchins Limited do not support the Plan and have the following objections in respect of settlement boundaries. It is noted that the first Objective of the plan is to review the settlement boundaries. The following comments also relate to Section 6 Settlement Boundary Review.</p> <p>Paragraph 4.13 of the WCS allows for the review of the existing settlement boundaries through the Wiltshire Housing Site Allocations Plan. Paragraph 4.15 states that:</p> <p>‘these settlement boundaries will also be reviewed as part of the Wiltshire Housing Site Allocations Plan as set out in the Council's Local Development Scheme, in order to ensure they remain up to date and properly(emphasis added) reflect building that has happened since they were first established ’ . (my emphasis).</p> <p>In some cases these are clearly out of date as they do not reflect recent planning permissions.</p> <p>Topic Paper 1 Settlement Boundary Review Methodology states that as the boundaries were not altered in the Wiltshire Core Strategy and they relied on the district local plan boundaries. Para 1.3 states that the “Council has undertaken a comprehensive review of the boundaries to ensure they are up-to-date and adequately reflect changes which have happened since they were first established. The Plan amends settlement boundaries where necessary. It is also the prerogative of local communities to review them through the preparation of neighbourhood plans.”</p> <p>It is noted that the three case studies referred to in Topic Paper 1 that Winchester City included in the settlement boundary “Built/ commenced allocations/ planning permissions”.</p> <p>Purbeck includes “Uses and buildings (including sites with unimplemented planning permission) that have a clear social or economic function.”</p> <p>Kettering Borough Council includes “Existing commitments for built developments.”</p> <p>It is noted that the Wiltshire Council draft settlement boundary methodology included “Both built and extant planning permissions for residential and employment uses for areas which are physically/ functionally related to the settlement.” However, following consultation with the Parish and Town Councils who disagreed that the settlement boundary should include allocations, development proposals and unimplemented planning permissions as those who objected to the inclusion of sites with planning permission considered that many planning permissions never get built out and that the final built form may differ substantially from the original permission; the methodology was changed.</p> <p>Only for those planning permissions that have commenced are included in the settlement boundary as they consider that there is much greater certainty.</p> <p>The Topic Paper concludes “Therefore, the revised settlement boundary review methodology will include within the settlement boundary built or commenced planning permissions but exclude all unimplemented planning permissions. Nevertheless, it is recognised that settlement boundaries represent a snapshot in time. Unimplemented planning permissions subsequently built out can be included within a future review.”</p> <p>The revised settlement boundaries proposed for Melksham, Westbury and Calne are not up to date and do not reflect recent planning permissions to RHL references 15/12454, 14/09262/OUT, 14/11179/OUT land at Prince Charles Drive, Calne respectively and also land at Low Lane Calne LPA reference 17/00679/OUT).</p>			

	<p>The settlement boundary of Melksham should be revised to reflect planning permission 15/12454 land to the north of Sandridge Common, Sandridge Road, Melksham, where development has started.</p> <p>Likewise the settlement boundary of Westbury should be revised to reflect planning permission 14/09262 which was granted on appeal in July 2016 (300 dwellings, land north of Bitham Park, Trowbridge Road, Westbury) which has started. It is noted that the proposed new settlement boundary includes land to the west of Trowbridge Road which was granted permission and is under construction (220 dwellings 13/03568), but not land to the east of Trowbridge Road.</p> <p>It is noted that the settlement boundary is proposed to be altered to reflect earlier planning permissions at Calne, namely land off Sandpit Road and land south of Abberd Lane, which have been built and under construction; however recent planning permissions land at Prince Charles Drive (14/11179 for 130 dwellings) and land at Low Lane Calne (17/00679 for 165 dwellings) are not reflected in the changes to the settlement boundary. Building has commenced on Land at Prince Charles Drive.</p> <p>The issue is what harm would there be to the settlement strategy of updating the settlement boundary to reflect the recent planning permissions in addition to those under construction. These sites are after all considered against the housing supply and are consistent with the settlement strategy and are in some cases under construction.</p> <p>The comments above are also applicable to Chapter 6 and the Community Area Topic Papers.</p> <p>The issue is what harm would there be to the settlement strategy of updating the settlement boundary to reflect the recent planning permissions in addition to those under construction. These sites are after all considered against the housing supply and are consistent with the settlement strategy and are in some cases under construction.</p> <p>It is considered that the settlement boundaries should be amended to reflect allocations and sites with planning permissions.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Pegasus on behalf of Robert Hitchins Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.</p>

Comment ID:	3260	Consultee Robert Hitchens Ltd	Agent Sarah Hamilton-Foy Pegasus Planning Group	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 841197	Person ID: 397761	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.7		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Robert Hitchens Limited do not support the Plan and have the following objections in respect of housing supply. Further to representations submitted in response to para 2.19, Table 4.7 The supply for North and West Wiltshire HMA of 27,450 dwellings (Table 4.7) can be reduced by the following:</p> <ul style="list-style-type: none"> Delete saved Local Plan allocations in the HMA i.e. 446 dwellings Delete the inclusion of the brownfield sites to avoid double counting (only one in the HMA is Warminster) 35 dwellings Recalculate windfalls (i.e. critique of WC methodology) reduce total number of windfalls in HMA by 977 Delays to Ashton Park and a strategic site in Chippenham (this arose at the recent Lynham appeal) i.e. 385 dwellings <p>Therefore, the supply of 27,450 is reduced by 1,843 (i.e. total from bullet points above) = supply equals 25,607 dwellings Therefore against the new housing requirement of 25,918 the supply is 25,607 and therefore there is a short fall of 311 dwellings as opposed to a surplus of 2,710. The text and tables relating to the housing land supply should be amended accordingly.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Pegasus on behalf of Robert Hitchens Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.				

Comment ID:	3261	Consultee Robert Hitchens Ltd	Agent Sarah Hamilton-Foyn Pegasus Planning Group	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 841197	Person ID: 397761	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.8		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Robert Hitchens Limited do not support the Plan, there is a lack of transparency in the evidence base. It is noted that Table 4.8 HMA 5 year land supply estimate 2017 – 2018 indicates that there is in excess of a 5 year supply for the North and West HMA through to 2025/2026, however, in this year the housing supply is only 5.3 years. It is noted from Topic Paper 4 that the 5 year supply has been calculated on the basis that if a 20% buffer was required then a 5 year land supply could be met. Even in the year 2025/26 it would appear that the Council can demonstrate a 5 year land supply in the North and West HMA with a 5% buffer. However, what is not clear from Topic Paper 4 is the calculations behind these figures. Pegasus reserve the opportunity to comment on these figures when the information is made available. There is a lack of transparency in the figures presented. Consequently the plan is not sound as it is not justified.</p> <p>Detailed information on housing land supply should be made available in order to assess the soundness of the plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Pegasus on behalf of Robert Hitchens Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.				

Comment ID:	3262	Consultee Robert Hitchens Ltd Person ID: 841197	Agent Sarah Hamilton-Foy Pegasus Planning Group Person ID: 397761	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.44 - 4.61		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Robert Hitchins Limited do not support the Plan and consider that there are grounds to increase the housing requirement to reflect the OAN as since the Core Strategy Examination there is no longer the evidence to support the constrained housing requirement. Furthermore, Pegasus question the housing supply and also the deliverability of some of the sites.</p> <p>It is noted that within the North and West Wiltshire HMA that there are marked differences in the anticipated growth of Calne and Westbury compared to the two Principal Settlements of the HMA i.e. Chippenham and Trowbridge, where land has not come forward as the Council anticipated.</p> <p>The market towns of Calne and Melksham have exceeded anticipated rates over the first part of the plan period. However, it is noted that indicative levels of housing for market towns are not a ceiling and according to the plan variations would not seem to present new or significant issues for local infrastructure and environmental capacity, consequently there is further capacity at these settlements which is available, suitable and achievable.</p> <p>The Plan states that Chippenham has failed to meet anticipated growth rates and as a consequence land at Calne has come forward to meet housing needs over and above what was envisaged for Calne in the Plan period. However, the Plan now anticipates that as a result of the significant allocations for housing development made in the recently adopted Chippenham Site Allocations DPD that development will now come forward.</p> <p>Nevertheless, it is noted that the indicative housing requirement for Chippenham urban area is 4,510 dwellings, i.e. 225 per year. According to Table 4.10 only 1,204 dwellings have been completed in the period 2006 – 2017, half the plan period, leaving a significant amount to be delivered in the remaining plan period. It seems that the majority of dwellings are to come forward on strategic sites which have been delayed due to the Chippenham SADPD and other reasons. These sites have particular constraints to overcome before they can deliver e.g. North Chippenham which is a site for 750 homes and 2.7 hectares of employment land (12/00560/OUT) was permitted in February 2011, but still not achieved any completions. Consequently it is not clear when first completions will be delivered. Land at Hunters Moon is a site for 450 homes and 2.3 hectares of employment land (13/01747/FUL) and in para 4.6 of the Chippenham Site Allocations DPD states that “it has been approved subject to the signing of a section 106 agreement.”. According to the list of planning applications a full application for the first phase has been submitted. However the Housing Land Supply of March 2017 does not envisage any completions on site until 20/21.</p> <p>Rawlings Green site for 650 dwellings - Only up to 200 new homes can be accommodated before a new link road is needed to connect the site over a new railway bridge to the distributor road provided as part of the North Chippenham development in Area A). the Chippenham Site Allocations DPD states in par 4.19 that “It is an objective of this Plan that the route through North Chippenham connecting the B4069 with the A350 must be in place before any development commences beyond the first phase of 200 dwellings on the Rawlings Green allocation.”</p> <p>Patterdown and Rowden (South West Chippenham) is assumed to deliver in 2017/18 but has not started. Para 4.20 of the Chippenham Site Allocations DPD acknowledges that “...two sites can accommodate a total of approximately 2,050 homes although it is possible that not all this number will be built within the plan period to 2026. At a late point in the current plan period allocated land may contribute to meeting housing</p>				

requirements for the next plan period and reduce the potential for a fall off in housing supply while a new plan is emerging for the period beyond 2026. The scale of development recognises the additional complexity of ensuring deliverable land.”

The evidence indicates that the trajectory must still be uncertain for a number of the large sites at Chippenham which the plan relies upon. Within the HMA at Trowbridge, there have been significant delays to the delivery of housing, in particular the extensive delays to secure planning permission on the Strategic Allocation of Ashton Park. In addition there are significant ecological, landscape, Green Belt and infrastructure constraints that significantly limit the choice of available sites (the plan acknowledges the constraints to development at Trowbridge).

The evidence indicates that three considerations to be addressed in order for housing development to be accommodated:

“Ecology:an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats”.

“Education: development will increase the number of pupils needing primary school places. A local lack of capacity across the town affects proposals allocated for development. With the majority of proposed housing being directed south/south-west of the town, the evidence points directly to the need for a new primary school in this area. Therefore, in addition to land reserved for one new school, funding contributions will be sought from developers to help provide adequate capacity.”

"Health Services: development will also increase demand for primary health care and funding contributions may also be sought to expand the capacity of GP services and dentistry. Contributions will be justified on a site by site basis in discussion with Clinical Commissioning Group and NHS England.”

Although the SADPD proposes to allocate six sites for development there remains a shortfall of 1,220 dwellings, which can only be exacerbated now that Ashton Park is not going to deliver in the plan period as envisaged. (The Council already acknowledge in para 4.52 that Aston Park will not deliver in the plan period and that 1,000 dwellings will be delayed post 2026. However, new evidence has come forward at the recent Lynham appeal and it is evident that this shortfall will increase by a further 300 dwellings.) Consequently the shortfall for Trowbridge could be increased by approximately 300 dwellings, giving a total shortfall of 1,520 dwellings.

On review of the proposed allocations e.g. in Trowbridge, some of these must be questionable. For example:

Reference H2.1 Elm Grove, Trowbridge,

It is concerning to note that SA repeats the earlier reference to the site being to the south west of Trowbridge.

Site includes recorded presence of Bechstein’s Bats associated with the Bradford-on-Avon Bats SAC, it is within easy walking distance of Biss/Green Lane Wood a core roosting area. Despite this the ecological effects are considered moderate.

There is no up-to-date assessment of the grade of agricultural land at this site and therefore it is difficult to know whether it accords with national policy.

It is noted that there is a shortfall in capacity of local primary schools and the location of the railway line means the pupils will not be able to access the planned school development at Ashton Park.

It is noted that cycling and other sustainable access to the town centre would need to be improved. Given the distance of the site from the centre of Trowbridge it is clear that car dependence will increase from the site given the lack of alternative options.

Reference H2.2 land off the A363 White Horse Business Park for 150 dwellings would lead to the coalescence of Trowbridge and North Bradley village. The SA states that the site (ref 298) is located in the town of Trowbridge, Whilst North Bradley does sit in close proximity to Trowbridge it does not form part of continuous urban area and is not included in the settlement boundary for Trowbridge and the Wiltshire Core Strategy defines North Bradley as a village. Therefore development of this site will erode the individual identity of North Bradley and lead to coalescence with Trowbridge.

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	<p>It is noted that cycling and other sustainable access to the town centre would need to be improved. Given the distance of the site from the centre of Trowbridge it is clear that car dependence will increase from the site given the lack of alternative options.</p> <p>Reference H2.3 Elizabeth Way</p> <p>This site at Elizabeth Way (H2.3) also reduces the gap between Trowbridge and Hilerpton, Hilperon is referred to as a large village.</p> <p>Coalescence issues at Trowbridge</p> <p>The site at White Horse Business Park (H2.2) together with Elm Grove Farm (H2.1) would result in the coalescence of North Bradley with Trowbridge. Particularly when the sites to the west i.e. land at Church Lane (H2.4) and land at Upper Studley (H2.5) and land at Southwick Court (H2.6) are also considered. Page 179 Figure 7.15 does not include the sites H2.2, H2.5 and H2.6.</p> <p>It is clear that further allocations to the south and east of the town still have numerous ecological issues to overcome and would appear to be directly contradicting the key issues highlighted in paragraph 5.150 of the adopted Wiltshire Core Strategy.</p> <p>The HSAP further states that there are significant ecological, landscape and infrastructure constraints with the following issues needing to be addressed by housing and yet the HSAP allocates to areas directly affecting the key sites and species connect to the Bradford-on-Avon SAC.</p> <p>If there remains a shortfall after the consideration of other sites at Trowbridge which would be considered consistent with the settlement strategy, then sites elsewhere in the HMA should be brought forward to ensure housing is delivered, for example there are unconstrained opportunities at Calne and Melksham which are sustainable locations and the sites are available, suitable and achievable in accordance with the NPPF.</p> <p>The following sites are proposed if needs cannot be met in accordance with the strategy for the Trowbridge Community Area. Sites at Melksham and Calne are within the same HMA.</p> <p>Land to the north west of Melksham comprises 74.54 acres</p>
<p>Attached files (Please see Objective)</p>	<p>4750653</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Pegasus on behalf of Robert Hitchins Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.</p>

Comment ID:	3263	Consultee Robert Hitchens Ltd Person ID: 841197	Agent Sarah Hamilton-Foy Pegasus Planning Group Person ID: 397761	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Table	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		4.44 - 4.61		Effective	
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Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Robert Hitchins Limited do not support the Plan and consider that there are grounds to increase the housing requirement to reflect the OAN as since the Core Strategy Examination there is no longer the evidence to support the constrained housing requirement. Furthermore, Pegasus question the housing supply and also the deliverability of some of the sites.</p> <p>It is noted that within the North and West Wiltshire HMA that there are marked differences in the anticipated growth of Calne and Westbury compared to the two Principal Settlements of the HMA i.e. Chippenham and Trowbridge, where land has not come forward as the Council anticipated.</p> <p>The market towns of Calne and Melksham have exceeded anticipated rates over the first part of the plan period. However, it is noted that indicative levels of housing for market towns are not a ceiling and according to the plan variations would not seem to present new or significant issues for local infrastructure and environmental capacity, consequently there is further capacity at these settlements which is available, suitable and achievable.</p> <p>The Plan states that Chippenham has failed to meet anticipated growth rates and as a consequence land at Calne has come forward to meet housing needs over and above what was envisaged for Calne in the Plan period. However, the Plan now anticipates that as a result of the significant allocations for housing development made in the recently adopted Chippenham Site Allocations DPD that development will now come forward.</p> <p>Nevertheless, it is noted that the indicative housing requirement for Chippenham urban area is 4,510 dwellings, i.e. 225 per year. According to Table 4.10 only 1,204 dwellings have been completed in the period 2006 – 2017, half the plan period, leaving a significant amount to be delivered in the remaining plan period. It seems that the majority of dwellings are to come forward on strategic sites which have been delayed due to the Chippenham SADPD and other reasons. These sites have particular constraints to overcome before they can deliver e.g. North Chippenham which is a site for 750 homes and 2.7 hectares of employment land (12/00560/OUT) was permitted in February 2011, but still not achieved any completions. Consequently it is not clear when first completions will be delivered. Land at Hunters Moon is a site for 450 homes and 2.3 hectares of employment land (13/01747/FUL) and in para 4.6 of the Chippenham Site Allocations DPD states that “it has been approved subject to the signing of a section 106 agreement.”. According to the list of planning applications a full application for the first phase has been submitted. However the Housing Land Supply of March 2017 does not envisage any completions on site until 20/21.</p> <p>Rawlings Green site for 650 dwellings - Only up to 200 new homes can be accommodated before a new link road is needed to connect the site over a new railway bridge to the distributor road provided as part of the North Chippenham development in Area A). the Chippenham Site Allocations DPD states in par 4.19 that “It is an objective of this Plan that the route through North Chippenham connecting the B4069 with the A350 must be in place before any development commences beyond the first phase of 200 dwellings on the Rawlings Green allocation.”</p> <p>Patterdown and Rowden (South West Chippenham) is assumed to deliver in 2017/18 but has not started. Para 4.20 of the Chippenham Site Allocations DPD acknowledges that “...two sites can accommodate a total of approximately 2,050 homes although it is possible that not all this number will be built within the plan period to 2026. At a late point in the current plan period allocated land may contribute to meeting housing</p>				

requirements for the next plan period and reduce the potential for a fall off in housing supply while a new plan is emerging for the period beyond 2026. The scale of development recognises the additional complexity of ensuring deliverable land.”

The evidence indicates that the trajectory must still be uncertain for a number of the large sites at Chippenham which the plan relies upon. Within the HMA at Trowbridge, there have been significant delays to the delivery of housing, in particular the extensive delays to secure planning permission on the Strategic Allocation of Ashton Park. In addition there are significant ecological, landscape, Green Belt and infrastructure constraints that significantly limit the choice of available sites (the plan acknowledges the constraints to development at Trowbridge).

The evidence indicates that three considerations to be addressed in order for housing development to be accommodated:

“Ecology:an interconnected pattern of priority Biodiversity Action Plan (BAP) habitats such as mature hedgerows, trees and water features, along with designated woodland features around the town support significant populations of protected bat species associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC). Additional housing development will increase the population of the town and thereby amplify the risk of recreational pressure on bats”.

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On review of the proposed allocations e.g. in Trowbridge, some of these must be questionable. For example:

Reference H2.1 Elm Grove, Trowbridge,

It is concerning to note that SA repeats the earlier reference to the site being to the south west of Trowbridge.

Site includes recorded presence of Bechstein’s Bats associated with the Bradford-on-Avon Bats SAC, it is within easy walking distance of Biss/Green Lane Wood a core roosting area. Despite this the ecological effects are considered moderate.

There is no up-to-date assessment of the grade of agricultural land at this site and therefore it is difficult to know whether it accords with national policy.

It is noted that there is a shortfall in capacity of local primary schools and the location of the railway line means the pupils will not be able to access the planned school development at Ashton Park.

It is noted that cycling and other sustainable access to the town centre would need to be improved. Given the distance of the site from the centre of Trowbridge it is clear that car dependence will increase from the site given the lack of alternative options.

Reference H2.2 land off the A363 White Horse Business Park for 150 dwellings would lead to the coalescence of Trowbridge and North Bradley village. The SA states that the site (ref 298) is located in the town of Trowbridge, Whilst North Bradley does sit in close proximity to Trowbridge it does not form part of continuous urban area and is not included in the settlement boundary for Trowbridge and the Wiltshire Core Strategy defines North Bradley as a village. Therefore development of this site will erode the individual identity of North Bradley and lead to coalescence with Trowbridge.

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<p>Attached files (Please see Objective)</p>	<p>4750651</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Pegasus on behalf of Robert Hitchins Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.</p>

Comment ID:	3264	Consultee Robert Hitchens Ltd Person ID: 841197	Agent Sarah Hamilton-Foy Pegasus Planning Group Person ID: 397761	Do you consider the draft WHSAP is legally compliant?	Yes
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Paragraph		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
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It is concerning to note that SA repeats the earlier reference to the site being to the south west of Trowbridge.

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There is no up-to-date assessment of the grade of agricultural land at this site and therefore it is difficult to know whether it accords with national policy.

It is noted that there is a shortfall in capacity of local primary schools and the location of the railway line means the pupils will not be able to access the planned school development at Ashton Park.

	<p>It is noted that cycling and other sustainable access to the town centre would need to be improved. Given the distance of the site from the centre of Trowbridge it is clear that car dependence will increase from the site given the lack of alternative options.</p> <p>Reference H2.3 Elizabeth Way</p> <p>This site at Elizabeth Way (H2.3) also reduces the gap between Trowbridge and Hilerpton, Hilperon is referred to as a large village.</p> <p>Coalescence issues at Trowbridge</p> <p>The site at White Horse Business Park (H2.2) together with Elm Grove Farm (H2.1) would result in the coalescence of North Bradley with Trowbridge. Particularly when the sites to the west i.e. land at Church Lane (H2.4) and land at Upper Studley (H2.5) and land at Southwick Court (H2.6) are also considered. Page 179 Figure 7.15 does not include the sites H2.2, H2.5 and H2.6.</p> <p>It is clear that further allocations to the south and east of the town still have numerous ecological issues to overcome and would appear to be directly contradicting the key issues highlighted in paragraph 5.150 of the adopted Wiltshire Core Strategy.</p> <p>The HSAP further states that there are significant ecological, landscape and infrastructure constraints with the following issues needing to be addressed by housing and yet the HSAP allocates to areas directly affecting the key sites and species connect to the Bradford-on-Avon SAC.</p> <p>If there remains a shortfall after the consideration of other sites at Trowbridge which would be considered consistent with the settlement strategy, then sites elsewhere in the HMA should be brought forward to ensure housing is delivered, for example there are unconstrained opportunities at Calne and Melksham which are sustainable locations and the sites are available, suitable and achievable in accordance with the NPPF.</p> <p>The following sites are proposed if needs cannot be met in accordance with the strategy for the Trowbridge Community Area. Sites at Melksham and Calne are within the same HMA.</p> <p>Land off Low lane Calne (indicative plan showing 25 dwellings and location plan); Location plans are attached.</p>
<p>Attached files (Please see Objective)</p>	<p>4750654</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Pegasus on behalf of Robert Hitchins Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.</p>

Comment ID:	3265	Consultee Robert Hitchens Ltd	Agent Sarah Hamilton-Foy Pegasus Planning Group	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 841197	Person ID: 397761	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Policy	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2		Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Pegasus on behalf of Robert Hitchens Limited do not support the Plan.</p> <p>Para 2.16 refers to the Wiltshire Core Strategy which provides indicative levels of housing to each Community Area and includes indicative requirements for levels of housing for the Principal settlements, Market towns and in the South Wiltshire Housing Market Area, the local Service Centres; and their surrounding community areas. The distribution of development is in accordance with the strategy . The SADPD allocates land to support the distribution and in proposing allocations it focusses on those areas where land supply falls short of these indicative levels.</p> <p>Policy H2 proposes the housing allocations to meet the shortfall in the North and West Wiltshire Housing Market Area – set out in Table 5.3 by Community Area. There are some concerns about the sites identified to meet the shortfall at Trowbridge see representations to paragraphs 4.44-4.61 and para 5.43 – 5.44. If there remains a shortfall after the consideration of other sites at Trowbridge which would be consider consistent with the settlement strategy, then sites elsewhere in the HMA can be brought forward to ensure housing is delivered.</p> <p>Whilst there is no shortfall in the Melksham or Calne Community Area,(as evidenced in the respective Topic Papers even without taking into account windfalls) these market towns are both well placed to accommodate development that cannot be met in other areas in the HMA (if there are no sites consistent with the settlement strategy in Trowbridge where there is a significant shortfall.). It is recognised that the SADPD must implement the settlement strategy set out in the adopted Wiltshire Core Strategy.</p> <p>Policy H2 proposes the housing allocations to meet the shortfall in the North and West Wiltshire Housing Market Area – set out in Table 5.3 by Community Area. There are some concerns about the sites identified to meet the shortfall at Trowbridge see representations to paragraphs 4.44-4.61 and para 5.43 – 5.44 and also about the delivery envisage at Chippenham. If there remains a shortfall after the consideration of other sites at Trowbridge which would be consider consistent with the settlement strategy, then sites elsewhere in the HMA can be brought forward to ensure housing is delivered.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Given the housing shortfall at Trowbridge and the constraints to sites being developed Pegasus on behalf of Robert Hitchens Limited wish to participate at the Examination as we have raised issues which affect the soundness of the plan.				

Comment ID:	3266	Consultee Ms Brenda Mockridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed site is on a green field which forms a buffer between the villages of North Bradley, Southwick and Trowbridge town. If these villages lose this buffer then they lose their character, personality and community spirit.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3267	Consultee Ms Brenda Mockridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We would all lose good agricultural land and the flora and fauna which live there would be lost.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3268	Consultee Ms Brenda Mockridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The boundary with the existing housing is not just a line on the map. It is an historical and physical boundary marked on old maps. In 1840 it is shown with hedge, ditch and mature trees (some of which are still standing.) The hedgerow is filled with birds and small mammals which would be threatened. There is a well-used footpath along most of the boundary. The ditch follows the line of the boundary and runs into) the Lambrook stream. These features need to be retained in their entirety as they_ are an asset used by local residents, and reflect the history of the area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3269	Consultee Ms Brenda Mockridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>During wet weather the ditch fills to overflowing. Some surface water from the existing housing drains into the ditch, yet there is still a problem with standing water after heavy rain. The proposed site 3565 becomes waterlogged with the subsoil of heavy clay. Obviously if built on there is nowhere for the ground water to go.</p> <p>Any new estate will need a new sewerage system as the present one is not coping very well.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3270	Consultee Ms Brenda Mockridge	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Any new estate will need a new sewerage system as the present one is not coping very well.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3271	Consultee Ms Brenda Mockridge	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Assuming most of the housing is intended for families, the local schools cannot cope with such a large influx of pupils. The roads around local schools are already a nightmare to use. Giving token payments to schools on the other side of town is no use at all				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3272	Consultee Ms Brenda Mockridge	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Our local bus already has standing room only on a regular basis, it docs .not run on a weekend when the car parks in town are full. Who would want to buy a house on the edge of a town which is Impossible to access easily?				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3273	Consultee Ms Brenda Mockridge	Agent	Do you consider the draft WHSAP is legally compliant?	No
		Person ID: 1138693	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Surely so many houses and their cars will lead to extra pollution.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3274	Consultee Ms Brenda Mockridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	On a personal note I would find the noise and dust created by such a large development to be very disturbing and threatening. To have buildings erected just outside my front gate, filling the skyline and casting a shadow into my lounge and kitchen will be depressing. I shall feel boxed in and trapped in my own home.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3275	Consultee Ms Brenda Mockridge	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138693	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Southwick Court is a listed site, there are archaeological features all around the surrounding fields which should be respected and preserved. At least one test pit made to check for drainage has been dug on a post -medieval earthwork, making it pointless and destructive.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3276	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write in regards to the proposed housing allocation near Upper Studley (near Church Lane and The Poplars), Southwick Court, and Elm Grove Farm, representing approximately 445 new homes.</p> <p>I have examined the published proposals and I know all three sites well, as I own property on Westmead Crescent and Church Fields. I wish to strongly object to the proposed housing allocations on these sites.</p> <p>Wiltshire Council has an obligation to the residents of Trowbridge, Southwick, and North Bradley to ensure that the benefits of new housing outweigh the costs. It seems that, in this case, rather than properly exploring other options and understanding what their proposal means to local residents, they have simply chosen the easiest targets.</p> <p>I call on Wiltshire Council to stay true to their core planning strategy, to think about the people who will be impacted by these lazy proposals, and to choose what is right rather than what is easy.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3277	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>These three sites [Upper Studley (near Church Lane and The Poplars), Southwick Court, and Elm Grove Farm], collectively, form the boundary gap between Trowbridge and the villages of Southwick and North Bradley. Development in these sites must be very carefully considered: infilling will ruin the character of these lovely villages, overwhelm local services, and will have a vast array of other undesirable side effects. It may be argued that infilling these boundaries is not in accordance with paragraph 64 of the national planning policy framework, which states that "permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions" - I do not believe that any sort of new housing estate in these areas can possibly hope to achieve improvement in character and quality of these villages or the Bradley Gardens estate they border, and in no way will help to improve the way they function.</p> <p>I also believe that infilling these gaps is in direct contradiction to previous Wiltshire Council planning documents and decisions. Specifically, in a recent Wiltshire Times article, Councillor Geoff Whiffen said "Wiltshire Council go against their own core strategy. That document stated that developments should not be built where villages are swallowed up by towns, yet that is happening." This is an accurate way to describe the potential outcomes if these proposals are allowed through: it will be impossible to differentiate Southwick and North Bradley from Trowbridge. In this same article, Councillor Whiffen also referenced another recent planning decision that did pass: the erection of a solar farm off Axe and Cleaver Lane. Councillor Whiffen stated that the reason the solar farm was located in this position was specifically to avoid being near houses. Clearly, if housing is built around this development, that will no longer be true.</p> <p>Further, in addition to killing two beautiful, well-established, historic villages, the proposal is ill considered for a plethora of important reasons.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3278	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Frome Road is already exceedingly busy at peak times of day, and the traffic is fast moving, with almost no drivers slowing to 30 miles per hour as they enter Trowbridge limits: many people drive through the dip on Frome Road at speeds approaching 50 miles per hour, and only ease up as they pass Church Fields and hit the stop light at College Road. I speak from experience when I say that turning out of Church Lane is dangerous – I lived at 4 Church Fields for 3 years, and I never got used to peeking the nose of my car out. If additional traffic is expected to enter and exit at Church Lane or at another narrow lane on either side of Frome Road, it is only a matter of time before there is a fatal accident. Since moving to Westmead Crescent, I have also experienced the flow of traffic off Silver Street Lane and down Marston Road, which is very steady, despite the road being difficult to navigate due to the significant number of cars that park on both sides of the road. Many student drivers are also brought down this road to teach them how to execute parking manoeuvres. Most worryingly, there are many children in the area and there are no zebra or pelican crossings for them to use. Increasing the flow of traffic here to access Southwick Court or Elm Grove Farm will surely increase the possibility of accidents. Someone will get hurt.</p> <p>On a less severe note, the increased traffic on Frome Road and down Marston Road/Silver Street Lane will prove a nuisance to all residents on these streets - particularly those close to junctions. The increased number of vehicles will contribute to increased noise pollution, increased light pollution at night, and, likely, increased insurance premiums.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3279	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Beyond the danger and irritation that the increased traffic and poor access routes will entail, we must consider that adding nearly 500 additional homes into this area will strain local services. This area is served by Grove Primary School, Studley Green Primary School, and the Southwick Primary School.</p> <p>According to a recent article in the Wiltshire Times, Clare Medland, Wiltshire Council's head of school place commissioning, stated that "if hundreds of homes are built in Trowbridge and the surrounding areas, the area would desperately need one or even two new primary schools to cater for incoming pupils".</p> <p>I do not believe the three currently sufficient primary schools would be sufficient in the event that the proposal goes through. There will not be enough places for local children, and as young families grow, the crisis will become even more dire. Many couples on these estates are just starting out - as they mature, they will start to have children and will need local places for them. Should we be forced to take our children to other areas of town or to enroll them in private primary schools so that they have the opportunity to attain a good quality education?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3280	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In this same vein, I do not believe that the doctor's surgeries or the Trowbridge Hospital are equipped to support a significant population influx. It can be difficult to find a practice accepting new patients, and once you are accepted, you face lengthy wait times to be seen due to the high number of registered patients needing care. Visiting the Trowbridge Hospital shows a similar problem: lengthy wait times by an understaffed, poorly equipped facility that cannot cope with any sort of serious injury.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3281	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I would also suggest that, based on previously enacted pay freezes for emergency responders like fire fighters and police officers, Wiltshire Council is unable to support increased demands on emergency services for a significantly higher population. Council tax has been raised year on year, and yet these critical services have been unable to grow or to increase compensation for their employees, and other previously enjoyed services, like green waste, have been forced to be removed from the standard services supported by our council tax. Clearly, there is still significant budget pressure - adding more demands to this already strained budget will not result in good outcomes for any of us dependent on these services.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3282	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Additionally, it is a well-known fact that the area referred to as Southwick Court is seriously prone to flooding, and does so with regularity (some local residents who have been in Trowbridge for decades told me that it happens annually). In fact, after reviewing the Environment Agency Surface Flood Maps, I understand that some areas of these fields are actually classed as Flood Zone 3, which have a high probability of flooding. Likelihood of flooding will be further increased when development is executed within the catchment area of the water courses. It is unfair to build new properties on a site that is known to have such issues and expect the new home owners to deal with them when they inevitably occur. We can avoid the heartache and expense for them by simply choosing to build elsewhere. This issue is not at all addressed in your Housing Site Allocations plan, as far as I can tell. This is a serious oversight</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3283	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>On a communal note, I would also like to raise my objection to the destruction of our shared green space. Hundreds of people enjoy the green space that forms the boundary between Trowbridge and North Bradley and Southwick every day. Children play there. Families take their dogs on walks. People spend time in nature decompressing. The entire community of Trowbridge and all of those in the surrounding villages benefit from the preservation of this green space.</p> <p>I moved to Westmead Crescent at a very difficult time in my life, and I have found the Boundary Walk area to be exceedingly calming and good for my mental health. I would be heartbroken to lose the wide open spaces that have brought me such peace, and I know I am not alone in this. Destroying this green space will also mean the destruction of many mature trees and hedges, and will result in significant loss of wild life. Many birds, voles, mice, badgers, and foxes, amongst other things, make their homes in these fields. Stealing their homes for the benefit of complying with a top-down forced housing proposal is wrong.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3284	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Destroying this green space will also mean the destruction of many mature trees and hedges, and will result in significant loss of wild life. Many birds, voles, mice, badgers, and foxes, amongst other things, make their homes in these fields. Stealing their homes for the benefit of complying with a top-down forced housing proposal is wrong.</p> <p>Specifically, though, we must call attention to the habitat requirements of Bechstein's bats. The Housing Allocation Plan identifies that there are Bechstein's bats in the area, but it fails to highlight the fragility of the species. According to the Bat Conservation Trust, this breed of bat is one of the rarest in the UK - in fact, there are only 6 breeding populations in all of the country. All bats and their roosts are protected by the law.</p> <p>Disturbing this field, even with sympathetic intentions, could mean the total destruction of this incredibly rare breeding population and must be avoided</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3285	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Additionally, it should be noted that the Southwick Court area is part of the government's programmed for Higher Level Environment Stewardship scheme. This means that significant measures have been enacted to preserve the landscape in respect of the character of the area. If development is allowed to				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3286	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Lastly, I think it is fair to fear that significant development in these areas will have detrimental effects for the people already resident in these areas (Church Fields, Upper Studley, Bradley Gardens, North Bradley, Southwick, etc.)-which is worth considering, as it will impact thousands of people who have invested their savings in a home they expected to appreciate in value and that they would be able to enjoy in peace and tranquility. Those of us who live on these estates will be expected to accept lower property values, increased insurance rates, and increased noise and light pollution due to higher traffic. It is a lose-lose for us.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3287	Consultee Ms and Mr Britt and Chris Smith and Skinner	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138699	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>If further housing really must be built in Trowbridge, I question why existing brownfield sites, such as the derelict Bowyers site, have not been first in line for redevelopment.</p> <p>These brownfield areas are closer to public transport and closer to local amenities. Their development will not harm the local environment or wildlife nor the character of the surrounding area (in fact, they will significantly improve the visual appeal of the town), will improve safety by removing abandoned and potentially unstable structures, and because they are already in areas with safe access routes and slower moving traffic, will not substantially increase risk of vehicle accidents.</p> <p>It is in the interest of all residents of Trowbridge to see the brownfield sites redeveloped - developers should be properly incentivized to utilize this available space first before setting their sights on green spaces, and Wiltshire Council needs to enact and enforce planning guidelines that effectively police developer greed to protect all of its residents' interests.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3288	Consultee Mr Peter Bryan Marlborough College	Agent Mr Andy Pearce Barton Willmore LLP	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138628	Person ID: 1103789	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Paragraph	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		3.1-3.8		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The role of the Neighbourhood Plan and Draft plan should be set out and the latter should not fetter or prejudice future development that is required or beneficial to Marlborough. Please see attached statement.</p> <p>Please refer to attached statement including Marlborough Settlement Boundary Review Schedule</p> <p>The Draft Plan acknowledges that relationship of the Draft Plan and Core Strategy with the Neighbourhood Plans. The Draft Plan responds to the Core Strategy. This was adopted in January 2015 but was submitted to the Secretary of State for examination on 10 July 2012; the evidence base that supported that overarching spatial strategy is therefore some 5 years old if not older. Housing needs and local needs will therefore have changed and evolved in that period and the Site Allocations DPD (the Draft Plan), predicated as it is on meeting the needs identified in the adopted Core Strategy cannot address these more recent and up to date needs of the community. In the case of Marlborough, the MANP is intended to identify and provide a platform for such needs to be identified and addressed.</p> <p>It is important therefore that the Draft Plan does not fetter nor prejudice future development that is required or beneficial to Marlborough. This includes the release of land to meet local needs, be it for social and community uses and housing.</p> <p>The role of the Neighbourhood Plan and its relationship with the Draft Plan should be expressly set out. In addition, in seeking to review the settlement boundaries, these should not be drawn so tight so as to eliminate any flexibility nor prejudice or fetter the continued vitality and sustainability of Marlborough. Indeed, we would suggest that the Draft Plan should expressly require or confirm the expectation that Neighbourhood Plans should fulfil the role of identifying local needs over and above those identified in the Core Strategy and related DPD based upon up to date evidence.</p>				
Attached files (Please see Objective)	4751635				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our objections in part relate to the methodology applied to determine settlement boundaries. This needed to be explored and has not been justified by the evidence base. Further, the Council's assessment appears subjective and is not borne out by the detailed characteristics of the individual sites in question.				

Comment ID:	3289	Consultee Mr Peter Bryan Marlborough College	Agent Mr Andy Pearce Barton Willmore LLP	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138628	Person ID: 1103789	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Chapter 4 Housing Delivery Strategy		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The representation outlines how no further sites are allocated for development in the draft plan but that the background work states that there are no insurmountable issues that would restrict delivery of the level of housing proposed in the plan period. See detail and background in attached representation.</p> <p>It is important that the draft plan does not prevent the further release of land for development. See detail in attached representation including the Marlborough Settlement Boundary Review Schedule.</p>				
Attached files (Please see Objective)	4751635				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Our objections in part relate to the methodology applied to determine settlement boundaries. This needed to be explored and has not been justified by the evidence base. Further, the Council's assessment appears subjective and is not borne out by the detailed characteristics of the individual sites in question.				

Comment ID:	3290	Consultee Mr Peter Bryan Marlborough College	Agent Mr Andy Pearce Barton Willmore LLP	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138628	Person ID: 1103789	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Chapter 6 Settlement Boundary Review		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>(Text references refer to attached representation)</p> <p>Chapter 1, paragraph 1.5: The draft plan seeks to identify further land to meet the housing requirement as per the adopted Core Strategy. No additional land is proposed for release in Marlborough. In addition, the draft plan seeks to review the boundaries to settlements. This review is not confined to accommodating additional sites to meet the unmet needs identified in the Core Strategy but it is an attempt by the Council (as per the Council's justification) to introduce a standard methodology to underpin the setting of settlement boundaries across the County.</p> <p>Chapter 1, paragraph 1.6, bullet point 2: Settlement Boundaries: The proposed amendment to the boundaries is not justified. The College disputes the criteria employed and the application of that methodology. The amendments have not been positively prepared and setting the boundaries as proposed would unduly restrict and impinge upon the future development needs of the College, without justification.</p> <p>Chapter 3, paragraphs 3.22-3.26: It is important therefore that the Draft Plan does not fetter nor prejudice future development that is required or beneficial to Marlborough. This includes the release of land to meet local needs, be it for social and community uses and housing.</p> <p>The role of the Neighbourhood Plan and its relationship with the Draft Plan should be expressly set out. In addition, in seeking to review the settlement boundaries, these should not be drawn so tight so as to eliminate any flexibility nor prejudice or fetter the continued vitality and sustainability of Marlborough. Indeed, we would suggest that the Draft Plan should expressly require or confirm the expectation that Neighbourhood Plans should fulfil the role of identifying local needs over and above those identified in the Core Strategy and related DPD based upon up to date evidence.</p> <p>Settlement boundaries should in part reflect the development needs of the community over the plan period and also provide a sensible and robust platform for the development of the community. As stated in the Paragraph 001 (Reference ID: 50-001-20160519) of the Planning Practice Guidance²¹ all settlements can play a role in delivering sustainable development in rural areas.</p> <p>We can understand the Council's desire for consistency but at the same time, the Core Strategy is predicated upon the existing settlement boundaries and further, the Council acknowledges that neighbourhood plans will or can amend those boundaries which presumably would be on the basis of up to date evidence and site specific assessment. There therefore seems little need to impose an amendment at this time save for that required to accommodate specific sites to meet the needs identified in the Core Strategy.</p> <p>In addition to the generality of the approach, we are concerned as to the application of the methodology. The methodology set out in Topic Paper 1: Settlement Boundary Review Methodology (June 2017)²² requires careful application. We are not convinced that the tests or methodology are the appropriate basis and certainly from the basis our site visit, do not justify the proposals in respect of the College's land holdings and other land. We would question whether the Council has undertaken a site visit in association of its review as no request for access to the College has been received.</p>				

	<p>Chapter 5, paragraph 5.1, bullet point 2: Settlement Boundaries: The proposed amendment to the boundaries is not justified. The College disputes the criteria employed and the application of that methodology. The amendments have not been positively prepared and setting the boundaries as proposed would unduly restrict and impinge upon the future development needs of the College, without justification. The plan is not therefore sound. See attached representation including the Marlborough Settlement Boundary Review Schedule.</p>
<p>Attached files (Please see Objective)</p>	<p>4751635</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Our objections in part relate to the methodology applied to determine settlement boundaries. This needed to be explored and has not been justified by the evidence base. Further, the Council's assessment appears subjective and is not borne out by the detailed characteristics of the individual sites in question.</p>

Comment ID:	3291	Consultee Mr Peter Bryan Marlborough College	Agent Mr Andy Pearce Barton Willmore LLP	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138628	Person ID: 1103789	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.7		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>(Text references refer to attached representation) Chapter 4, paragraphs 4.1-4.9: The College needs to continue to grow and develop as does Marlborough as a town. For the College, the requires the continued replacement and provision of new facilities, educational, pastoral and sporting. The College aims to attract and retain the best staff and wishes for staff and pupils alike to play active role and contribute positively to the local community. Much of the College's landholdings lie outside of the settlement boundary although a significant area falls within the settlement. These areas within the existing settlement boundary are in use by the College, the use is urban and further, the land is essential to providing for the future development needs of the College. Removing such land now from the settlement, will harm the potential of the Collage to accommodate future needs. The draft plan proposes to amend the settlement boundary in relation to the College's land holdings. In some areas, the Council appears to seek to relocate the boundary from one side of a road to another, with the road itself forming the defined boundary to the settlement. This is an unnecessarily pedantic approach. However, in other instances, Council is proposing to remove land that is in active use by the College and forms part of what would logically be defined or appreciated as the College's main campus. Schedule 1 attached at Appendix 2 together with Plan 1 identifies the land holdings in question and identifies the basis of the College's objection. The principle area of concern relates to Parcel 2 as per Plan 1 and Schedule 1. The proposed amendment relates in practical terms to three core areas: The headmaster's garden and allotments; Sports pitches to the south between the Languages Centre and Millmead; The main carpark and sports pitch to the north. All three areas are urban in character and are physically and functionally related to the College. All three areas benefit from an existing and robust boundary either to the Kennet or a dense tree boundary. The Kennet forms a robust boundary and the vegetation associated with the river corridor encloses the headmaster's garden and allotments from the south, whilst to the east the grounds are enclosed by the boundary wall to the A345. The main car park is laid out with hard standing and to the north, between the car park and the A4 lie playing fields. The Boundary to the A4 is formed by railings atop a dwarf wall, with brick piers. As stated, the tree belt on the western boundary forms a strong means of enclosure. In addition to the College's land holdings, the College also wishes to object to the proposal removal of land at College Fields (Parcel 4). The land in question is the subject of a current claim to designate as a Village Green. This is resisted by the Council and the College. The land is laid out as open space as was transferred to Kennet District Council pursuant to a s52 agreement that accompanied the development of the College Fields site in the 1980s for residential purposes. The purpose of the land and hence justification for the transfer was to provide open space to meet the needs of the residential development. It is therefore to all intents ancillary to the residential development. It is bounded to the west and</p>				

	<p>east by residential development and the main estate road to the south. The northern boundary is formed by a hedge and tree belt that divides the site from the open countryside. See attached representation of comments on the settlement boundary review for Marlborough.</p> <p>Chapter 5, paragraph 5.1, bullet point 2:</p> <p>Settlement Boundaries: The proposed amendment to the boundaries is not justified. The College disputes the criteria employed and the application of that methodology. The amendments have not been positively prepared and setting the boundaries as proposed would unduly restrict and impinge upon the future development needs of the College, without justification.</p> <p>The plan is not therefore sound.</p> <p>The amendments to the settlement boundary are not justified. See detailed comments and suggested changes to the settlement boundary in schedule 1 of the attached response. See detail in attached representation including the Marlborough Settlement Boundary Review Schedule.</p>
<p>Attached files (Please see Objective)</p>	<p>4751635</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	<p>Our objections in part relate to the methodology applied to determine settlement boundaries. This needed to be explored and has not been justified by the evidence base. Further, the Council's assessment appears subjective and is not borne out by the detailed characteristics of the individual sites in question.</p>

Comment ID:	3292	Consultee Sophie Norcott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136156		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My name is Sophie Norcott and I am xx years old. I live at xx xx xx, Bratton and I am writing to you to raise a complaint about the proposed building of houses in the field behind my house.</p> <p>Too many houses! It's not a big field and 40 houses seems a lot to cram in to the space. They will have tiny gardens and not enough parking. The school is already too small and roads near the field are very dangerous to cross.</p> <p>Sunlight / being over looked: A few years ago, the family that lived at 10 Rosenheim Rise did the accurate calculations that the houses would get no direct sunlight if new houses were built behind them. This would mean our garden in the summer would be darker and colder, we wouldn't be able to enjoy our garden as much as we do now. If houses are built on the field behind my house we will be over looked because they will be so much higher than us, meaning they will be able to see directly into my sister's bedroom, invading her privacy.</p> <p>Sleep: It will be harder to sleep because of the noise of the new residents who will have cars pulling up around the clock. My sister who has Down syndrome sleeps at the back of the house where you can hear every sound from that field/road. She finds it very difficult to get to sleep and stay asleep she goes to bed at 7:00pm when lots of the cars may pull in.</p> <p>I hope you take your time to read this and understand that this proposed development will not benefit the village it will just spoil the lovely place I live in. Please look carefully and change you minds about this.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3293	Consultee Sophie Norcott	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136156		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Flood risk: During the latest down pour my dad videoed the stream of water that was pouring down our road. If you put houses on the field above, it will cause major flooding. The field absorbs all the water that comes from the road above and the rain. If it was tarmac all the water would be running down the hill in to our garden which in my case has guinea pigs in and around/into our house which could cause a flood. Even if you put plenty of drains on our road and the field the it may not be enough and our house may still flood as we are below the field. What if due to the amount of rain the drains overfilled and squirted out sewage water, do you really want that all over our gardens and roads?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3294	Consultee Sophie Norcott	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1136156	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Traffic: The development will increase traffic on the B3098, a busy road that has seen 49 reported collisions (11 "serious") since 2000. Court lane would get busier due to the amount of people trying to get to and from Bratton School to Westbury or Trowbridge. Every day myself and lots of other children have to cross court lane and it is already extremely difficult to cross at the moment without extra traffic I don't want to get hit but that is the safes way to school I know a lot of people who would back this.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3295	Consultee Mr. Paul Cunningham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 862429	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Netherhampton Housing</p> <p>We the undersigned petition the council to The proposed housing allocations on Netherhampton Road between Netherhampton and Harnham are unjustified without a clear transport and infrastructure strategy. We the undersigned believe these allocations should be removed from the Draft Housing Allocation Plans until the transport and infrastructure issues have been addressed'</p> <p>There is no plan for transport or other infrastructure to support the proposed housing allocations. The result of building these new houses without a comprehensive re-think of Salisbury's transport and infrastructure plan will be a massive increase in traffic and associated problems and a severe impact on quality of life for everyone who lives in the south of Salisbury</p> <p>This ePetition ran from 15/09/2017 to 15/10/2017 and has now finished.</p> <p>5 people signed this ePetition.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3296	Consultee Mrs Sonia Parry	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138780		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		263 & 297		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.					
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	We wish to be available to the Inspector to expand and explain, with further detailed evidence and as he/she may require, the issues that we have raised and the changes to the Plan that we argue for.				

Comment ID:	3297	Consultee Bett Paxton-Brunning Person ID: 1138813	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We would like to make comment on the consultation document regarding proposed allocation of housing site 102B.Harnham. On reading the Landscape Assessment section of the report. My Husband and I were convinced that all it contained with regard to the sensitivity would protect this site only to read further on in the report the suggestion that these sensitive issues could be mitigated by careful planning. We would like to disagree strongly with that suggestion. Once these historic sites like Harnham Hill and the views towards the Cathedral are gone they are gone forever.</p> <p>We live on Ayleswade Road SP28DR beside Swan Close and very near Harnham Road.This proposal would add considerably to the traffic and therefore increase the noise level and air pollution that we already suffer from.</p> <p>The sheer scale of the proposed development we feel could constitute overdevelopment and put great pressure on the surrounding area. Salisbury and the surrounding area are very special and is unique in the country. We need to keep it special for the thousands of visitors and local residents alike.</p> <p>Hopefully more appropriate sites can be found for much needed housing rather than using a sensitive site made up of good agricultural land.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3298	Consultee Mr Samuel Kelly	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126708	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I have lived in the Salisbury area all my life and in my present location of Coombe Road, Harnham for 13 years and have found until recently it to be pleasant place to live with a reasonable balance of housing, amenities, roads, Schools etc.</p> <p>It is however very unfortunate over the last few years that the county council have granted somuch planning permission around the town, this has already reached stupid levels on the north side of the city and now at Wilton, for this to be allowed on the Harnham side as well, is bordering on the insane.</p> <p>There are already huge problems with traffic flow in and around the town and the pollution that is causing (another issue that is not talked about), the recent part closure of New Bridge road for bridge repairs, caused a melt down in traffic movement across the whole city and that is just one road, with the number of cars we have now.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3299	Consultee Mr Samuel Kelly	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126708	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Where are the new schools, doctors, dentists, and new or enlarged Hospital, the present one is already only barely coping. There have been no plans put forward for improvement to any of the above and nothing at all about improvements to the roads or even the repair of the existing ones.</p> <p>This housing expansion needs to be stopped, before it kills Salisbury stone dead, there is no one in the world with any knowledge of planning, who when looking at a housing expansion does not first put in place the required infrastructure, without this in place any expansion plan is going to fail in the long run. Members of the planning office would not need to look too hard to find many places where this has happened, and indeed to find many places where expansions are taking place where this priority has been dealt with first.</p> <p>It is time to wake up and notice what is happening and maybe look at who is making all the financial gain without putting anything of substance back!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3300	Consultee Mr Samuel Kelly	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1126708		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>There was once a well considered planning rule that gave great consideration to maintaining the green belt, this was not some ill thought out way of stopping people building houses but a control measure to make planners stop and consider what they were allowing to happen, so that some common sense might prevail.</p> <p>The government may have one idea but they do not live here and they do not know the area, and no matter what they say the county planners should do what is best for our area every time. At the present time in Salisbury that is not to build more houses and someone at county hall should be bold enough to tell the government that we have had enough.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3301	Consultee Mr & Mrs David Cooper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138819	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We wish to register our strong concern about the proposed housing developments in Harnham - we live on the Netherhampton Road and are fully aware of the amount of traffic that has increased in the 43 years that we have lived here. The amount of houses being proposed would bring this road to a complete standstill in the rush hours and peak holiday times, causing even more problems for the Harnham Gyratory and particularly for the residents living on this road. There is very little employment in Harnham itself so new occupants are likely to be using their cars for work as public transport has been reduced greatly and with increased costs over the years.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3302	Consultee Mr & Mrs David Cooper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138819	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The infrastructure in Harnham would also be severely stretched with only one primary school which is already fully attended.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3303	Consultee Mr & Mrs David Cooper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138819	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	The area of building is also likely to cause flooding in these days of such fluctuating weather extremes and there would be a loss of good rich agricultural land.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3304	Consultee Mr & Mrs David Cooper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138819	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The area of building is also likely to cause flooding in these days of such fluctuating weather extremes and there would be a loss of good rich agricultural land.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3305	Consultee Mr David Brierly	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138840		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.6 Worton Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>It has just been brought to my attention that the proposed changes to the settlement boundary in Worton exclude the entire garden of my mother's property whereas the gardens of all properties on the same side of the street are included. I appreciate that it is more likely an anomaly rather than a specific policy.</p> <p>I understand that the consultation period ended on Friday. However, my mother suffers from severe dementia and has been in hospital since the beginning recovering from an operation to repair a broken leg. As I do not live in Wiltshire and have had no cause to visit the house it is only by chance that I have found out about these changes and under the circumstances I would hope that you will consider my representation to correct the anomaly even though the consultation period ended on Friday.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3306	Consultee Mr and Mrs Peter and Irene Gilchriest	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138853	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.13 Ridgeway Farm, Crudwell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We write to object to the allocation of a further 40 houses on the Ridgeway site. There is no justification for this significant number of houses in the village they are not required in a local plan that seeks to provide an oversupply of houses. The village services especially the management of surface water and sewerage are already beyond capacity with no planned upgrade in the period this plan covers.</p> <p>We are not against expansion of the village but tetbury lane does not have a complete footpath to the village hall and children have been injured by cars in the past. It is therefore more likely with increased traffic this will happen again. Also it seems that this development is on farmland away from the centre of the village and whereas the original Ridgeway development had a planning gain to remove unnecessary and ugly buildings and was therefore justifiable this latest proposal has no such benefit. This development if allowed will threaten every acre of farmland in the village by the precedent it sets. Wcc will not be able to defend this threat</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3307	Consultee Ms Linda Roberts Interim clerk	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Broad Town Parish Council Person ID: 1138855		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		North and West HMA			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Broad Town Parish Council welcome the opportunity to input to the Wiltshire Housing Site Allocations Consultation. Our main concern is to ensure that small rural communities, such as ours, remain properly protected by the Wiltshire Core Strategy which we endorse.</p> <p>Broad Town is a close knit, supportive and vibrant community. We are proud of our rural setting with its contingent “lack” of amenities. Indeed, this is what gives our community its character and what binds us together. As a newly elected Council (May 2017 Elections) we have been impressed but not surprised by the energy from the people in the parish to make the most of our rural features – we will be creating community working groups to restore and maintain our footpaths and our White Horse. These are things that the community feels passionately about. The people of the parish are also stoutly committed to “no street lights” which again is seen as an intrinsic part of our way of life. This is evidenced in the 2009 Parish Survey where the clear majority of the parish residents were in favour of no development in the village.</p> <p>However, we also need to actively address the challenges of living near to bigger conurbations, such as excessive speeding through the village. With bigger conurbations on our doorstep we are conscious of the threat of urban creep and how this could be used as rationale to permit development on the edges of the village. But, our community is precious and we believe rural communities like ours are in danger of becoming an increasingly rare part of our County’s cultural heritage.</p> <p>To ensure proper consideration of this small rural parish in the future Housing Strategy, we would like to request that Broad Town is reclassified as a rural settlement. We have reviewed the criteria for classification carefully and believe that with due consideration Broad Town would be classed as a “not identified settlement” (no development). The information in appendix 1 shows the detailed analysis that we have undertaken on this, which we feel is irrefutable.</p> <p>We would also like to formally note that there are two future “deliverable areas” located in Broad Town Parish which are documented in the Consultation. We would like to state that both of these areas would be against the Core Strategy and would be opposed by the Parish Council. See attached for Appendix 1</p>				
Attached files (Please see Objective)	4751851				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3308	Consultee Mr & Mrs David Cooper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138819	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	We wish to register our strong concern about the proposed housing developments in Harnham - we live on the Netherhampton Road and are fully aware of the amount of traffic that has increased in the 43 years that we have lived here. The amount of houses being proposed would bring this road to a complete standstill in the rush hours and peak holiday times, causing even more problems for the Harnham Gyratory and particularly for the residents living on this road. There is very little employment in Harnham itself so new occupants are likely to be using their cars for work as public transport has been reduced greatly and with increased costs over the years.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3309	Consultee Mr & Mrs David Cooper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138819	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The infrastructure in Harnham would also be severely stretched with only one primary school which is already fully attended.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3310	Consultee Mr & Mrs David Cooper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138819	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The area of building is also likely to cause flooding in these days of such fluctuating weather extremes and there would be a loss of good rich agricultural land.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3311	Consultee Mr & Mrs David Cooper	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138819	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The area of building is also likely to cause flooding in these days of such fluctuating weather extremes and there would be a loss of good rich agricultural land.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3312	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol) Person ID: 1132626	Agent Tom Wright Planner Origin3 Person ID: 1126888	Do you consider the draft WHSAP is legally compliant?																																									
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		Do you consider the draft WHSAP is sound?																																									
Please identify the policy, paragraph, table, figure or site to which you are referring.	Housing Delivery Strategy																																												
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Housing Strategy</p> <p>Whilst we understand the Council's focus for this consultation period is on specific policies within the draft SAP, we consider there to be a wider issue in hand with the Council's planning strategy moving forwards that needs to be addressed relating to soundness and consistency with the NPPF (paragraph 182). Given the circumstances set out below, we consider that the only way the Council can deliver a sound Development Plan is by undertaking a more holistic review of the housing requirement and growth strategy now. Unless addressed now, the Council's planning strategy has the following deficiencies:</p> <p>The Council is unable to demonstrate a deliverable supply of sites for years 6-10, required by the NPPF (paragraph 47), as the Core Strategy (CS) (adopted in January 2015) did not provide for the preferable 15 year horizon advised by the NPPF (paragraph 157). There has been no "Early CS Review" as committed during the CS Examination. As such, by the time the SAP is adopted in Q4 2018 (at the earliest), there will be less than 8 years of the plan period remaining (up until 2026).</p> <p>The Council's evidence base suggests that Wiltshire will not be able to demonstrate a five year housing land supply in each of the three Housing Market Areas (HMAs) for year 8 (2025/26) (at best) meaning a more holistic planning review assessing the housing requirement would be appropriate now (see table 3.4 below).</p> <p>As a minimum, the Council should be allocating significantly more dwellings to ensure that there is a sufficient, robust rolling five year supply until the end of the plan period.</p> <p>Topic Paper 3 (Housing Land Supply), published in June 2017 as part of the Council's evidence base to support the SAP, suggests that when applying the most up to date completions data, the current planning strategy leaves the Council without a demonstrable five year supply in each of the three HMAs. Particularly in the South HMA where there is only a marginal five year supply. This does not account for any under or non-delivery.</p> <p>Table 3.4 of Topic Paper 3 – Housing Land Supply (2017-2026)</p> <table border="1" data-bbox="459 1241 1883 1369"> <thead> <tr> <th>HMA</th> <th>17/18</th> <th>18/19</th> <th>19/20</th> <th>20/21</th> <th>21/22</th> <th>22/23</th> <th>23/24</th> <th>24/25</th> <th>25/26</th> </tr> </thead> <tbody> <tr> <td>East</td> <td>8.47</td> <td>8.18</td> <td>8.32</td> <td>10.11</td> <td>13.64</td> <td>10.79</td> <td>8.21</td> <td>6.29</td> <td>4.94</td> </tr> <tr> <td>N & W</td> <td>6.62</td> <td>6.80</td> <td>6.81</td> <td>6.55</td> <td>6.48</td> <td>6.11</td> <td>5.42</td> <td>4.60</td> <td>3.82</td> </tr> <tr> <td>South</td> <td>5.64</td> <td>5.57</td> <td>5.42</td> <td>5.35</td> <td>5.28</td> <td>5.13</td> <td>4.59</td> <td>3.83</td> <td>2.97</td> </tr> </tbody> </table> <p>This is more concerning in light of recent Government announcements (DCLG Planning for the right homes in the right places: consultation proposals, 12 September 2017) suggesting that the Objectively Assessed Need (OAN) for Wiltshire will be uplifted significantly (1,270 dwellings more than the CS and SAP accounts for over the period 2016-2026) and applied to plans that have not been submitted for Examination by the</p>					HMA	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	East	8.47	8.18	8.32	10.11	13.64	10.79	8.21	6.29	4.94	N & W	6.62	6.80	6.81	6.55	6.48	6.11	5.42	4.60	3.82	South	5.64	5.57	5.42	5.35	5.28	5.13	4.59	3.83	2.97
HMA	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26																																				
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South	5.64	5.57	5.42	5.35	5.28	5.13	4.59	3.83	2.97																																				

31st March 2018. At present, the Council anticipates the SAP being submitted for Examination beyond this date. In our view this suggests the Council should be addressing this additional need as part of this process here and now.

This can only be done properly through a more substantial Local Plan Review. We understand from the Council's draft Local Development Scheme (LDS) currently under review that the strategy is to progress with a Joint Spatial Framework in partnership with Swindon Borough Council over the timeframe Q3 2017 – Q3 2019 and a subsequent Wiltshire Local Plan Review over the period Q3 2019 – Q1 2021.

We support this process. However in light of the above, we consider the Council should be progressing with this wider Local Plan review now rather than seeking a temporary fix through the SAP which cannot provide a sufficient planning strategy for the required 6-10 year period, contrary to the NPPF.

Lyneham: Policy Status

It is noted that the Wiltshire Core Strategy (WCS) identifies Lyneham as a 'Large Village' where only small scale housing to meet local needs is considered appropriate.

Lyneham has a good range of facilities including convenience food stores and a primary school, excellent existing public transport links to the wider region, and notably the highest "self-containment index" in the CA, in part owing to the MOD which remains a major regional employer. It should be noted in this context that during the CS Examination, Topic Paper 3 recognised that Lyneham had the potential to be a higher order settlement and was only overlooked due to its close proximity to other higher order settlements.

We consider Lyneham's location in close proximity to higher order settlements such as Royal Wootton Bassett, Chippenham and Calne to be advantageous given its good public transport links to a wider range of services (including secondary schools) and employment opportunities. Lyneham represents an appropriate location in which to direct proportionate further growth. It is a large village located less than 3 miles south-west of Royal Wootton Bassett, around 6 miles north-east of Chippenham and less than 4 miles north of Calne.

We will continue to seek the designation of Lyneham as a Service Centre through a Review of the WCS or a more comprehensive and wide ranging Site Allocations document.

Site Selection Criteria and Affordable Housing

The SAP is unsound in its approach to selecting settlements for allocations in that it fails to give any weight to affordable housing need, contrary to the NPPF.

The Evidence Base for the SAP and the Plan itself do not consider the scale of affordable housing need in the CAs or how this could be addressed through the Site Allocations. Instead the approach is simply based on the quantum of housing delivered or committed in each area. If a CA is already at or over provided for than that appears to be the end of the SAP process.

This is a blunt approach which fails to properly examine the characteristics of the supply in each area. Critically there is no consideration of the scale of affordable housing need and how, as required by the WCS and NPPF, this can be addressed.

The SAP does not propose to allocate sites at Lyneham due to the wider Royal Wootton Bassett and Cricklade CA having already exceeded its housing requirement of 385 dwellings set by the WCS. However it should be stressed that the WCS sets minimum housing requirements.

Where there is a strong market for growth such as the Royal Wootton Bassett and Cricklade CA, the Council should be seeking to positively plan to boost housing supply in these areas, particularly when there is a demonstrable need for affordable housing in the CA, understood to be at circa 188 households (Appeal Decision APP/Y3940/W/16/3162581, paragraph 107) in this case. Further development at Lyneham can go some way to addressing this immediate affordable housing need.

A closer examination of the current and predicted supply of sites in Lyneham shows that only a handful of additional houses are proposed expected to be delivered on very small sites, the majority of which will deliver no affordable homes.

The affects of a lack of supply of both market and affordable homes are well documented. In rural areas in particular where there is strong market demand this will lead to higher house prices further exacerbating the affordability gap that already exists.

Further, over a relatively short time frame the age profile of the population of villages in particular can change significantly, with the average age rising. The effect of this has again been highlighted in National studies: falling village school rolls; village school and other facilities closing and public transport services diminishing as demand for services reduces. Such outcomes are contrary to the advice for Policy makers in the NPPF.

The WCS and National Policy make reference to the affordable homes being delivered on exceptions sites in rural areas. In those Authority areas where there is monitoring of the delivery of such sites, long term evidence suggests that there is very little prospect of landowners 'giving away' land for effectively zero value for exceptions affordable housing.

	The most effective way of delivering affordable homes in rural areas is by targeting housing allocations to settlements which have a good range of services and facilities and, where Developers can deliver affordable homes as part of a mixed housing scheme.
Attached files (Please see Objective)	
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3313	Consultee Barratt Homes (Bristol) Barratt Homes (Bristol)	Agent Tom Wright Planner	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1132626	Origin3 Person ID: 1126888	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		North and West HMA			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Omission Site: Victoria Drive, Lyneham</p> <p>Enclosed with these Representations is a Concept Document in respect of our Client's site at land off Victoria Drive, Lyneham. The site represents an appropriate, sustainable location for further growth to assist the Council in boosting the supply both in the short term as part of the SAP and, the medium to longer term as part of a Review of the WCS.</p> <p>The land lies adjoining existing housing and provides the opportunity to deliver a significant element of affordable housing to meet the very high levels of need identified in the Policy Area. As the Concept document sets out the site could be developed in a series of phases.</p> <p>The westernmost part of the site, adjoining existing housing, can deliver up to 50 homes including a policy compliant level of affordable housing to begin to address the high levels of existing need in the CA within the context of the SAP. In addition the site has potential to deliver small scale employment provision as illustrated in the concept document.</p> <p>In the medium to longer term the larger part of the land can be developed.</p> <p>The development of the site would allow the opportunity to deliver a mixed use proposal which could include employment opportunities, community facilities and large scale open space.</p>				
Attached files (Please see Objective)	4751977				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3314	Consultee Mrs Gail Case	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138914	Person ID:	Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.14			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Cramming 40 houses on to a small site is not going to make it a pleasant place to live for the new residents – no doubt their gardens (necessary for wellbeing and wildlife) will be tiny. Building 40 new homes is too many for our village (not proportionate) of Bratton. Build 20 new homes (1/2) A variety of new homes gives people the opportunity to join the Bratton community. Less dense building will give the new residents space to breathe. It will keep the existing residents happy!</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3315	Consultee Mrs Susan Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138930	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Southwick Court lies outside the boundary of the town of Trowbridge. The outer limit of the town at this point is along the hedgerow and water course known as Lambrok Stream which runs beside the properties and public footpath on Boundary Walk (hence the name). Including Southwick Court fields in the housing allocation land would require redrawing the town boundary and removing the green buffer between the villages of North Bradley & Southwick and the town of Trowbridge. Incorporating these villages into the town would remove their separate identity and community structure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3316	Consultee Mrs Susan Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138930	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The fields at Southwick Court are bounded by ancient hedgerows which form part of an historic parish boundary. There are maps dated 1890 (OS revision) and 1793 (Anderson & Drury) which show these ancient hedgerow boundaries. These hedgerows would be classed as “important” under the terms of the 1997 Hedgerow Act as they meet the relevant criteria set out in the Act, ie the hedge must have a variety of broad leafed plants and trees, must run alongside a bridleway or footpath, and must be associated with a pre-1600 building associated with land management (Southwick Court is Grade 2 listed and was built in the 1500s).				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3317	Consultee Mrs Susan Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138930	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The proposed site at Southwick Court is subject to serious flooding. I understand that the inspection pits and test drillings recently carried out on this site show that the water table in these fields is less than one metre below the surface. It is also on a "clay belt" which makes surface drainage problematic. Having lived in this area for more than 40 years, I know that these fields flood on a regular basis after heavy rains, sometimes to a considerable depth. There has also been an issue with sewage waste from the drains crossing the fields in the local area where waste matter has backed up into gardens at the lower end of Sandringham Road.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3318	Consultee Mrs Susan Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138930	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>The HSAP does not appear to have taken into consideration how a housing development on this site would be accessed. Any plans to access Southwick Court fields via one or more of the residential roads adjoining this site, ie Sandringham Road, Balmoral Road, Spring Meadows or Marston Road would have a severe environmental impact. These roads are not suited to the high volumes of vehicle movements that such a development would generate as, in the case of Sandringham Rd, Balmoral Road and Spring Meadows, these are narrow cul-de-sacs.</p> <p>Creating access roads through the “important” protected hedgerows would contravene the Hedgerows Act (see Point 2) and have a detrimental ecological effect by destroying the habitats of birds, bats and other wildlife that nest and feed in them.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3319	Consultee Mrs Susan Holt	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138930		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Entrance and egress at Southwick Court fields using the very busy A361 Frome Road would be dangerous because of impaired visibility. A similar argument would apply to the A363 North Bradley/Westbury Road. In addition, both the A361 and A363 are very heavily used by traffic entering and leaving the town, especially in the mornings, at the beginning and end of the school day (there are 3 senior schools, Trowbridge College, and 5 junior schools in the immediate area) and in the early evening. There are also considerable traffic movements on Bradley Road at other times of the day with vehicles going to and coming from the two Retail Parks situated there and the White Horse Business Park.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3320	Consultee Mrs Susan Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138930	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	There is a disproportionate allocation of housing to the town of Trowbridge when compared with other towns in North and West Wiltshire (section 4.44 of the Draft Housing Site Allocations Plan identifies the Housing Market areas and proposed levels of growth). Almost 7,000 new dwellings are proposed for the town in the indicative requirement for 2006-2026, compared with 4,510 for Chippenham, 2,240 for Melksham, and 1,920 for Warminster.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3321	Consultee Mrs Susan Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138930	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Although Trowbridge is the County Town of Wiltshire, there has been a lack of infrastructure investment over many years, so it has limited industrial, business and commercial employment opportunities. A once vibrant shopping centre now has many empty retail premises and even the covered areas of Castle Place and the Shires have many unused shops. Building several thousand new homes in Trowbridge will simply make it a dormitory town for people working in places such as Bath, Bristol, Swindon and Chippenham, with the resultant negative environmental impact caused by substantial increases in traffic flow on the already narrow and congested roads in and around the town.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3322	Consultee Mrs Susan Holt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138930	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing Delivery Strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>New regulations were proposed in April 2017 to encourage local authorities to speed up the development of derelict and under used land for new houses by creating Brownfield Registers. On 3rd April 2017 the government website quoted the Rt Hon Gavin Barwell, who was then the Housing and Planning Minister, as follows “The regulations implementing brownfield registers and permission in principle through brownfield registers have been laid in Parliament as part of secondary legislation relating to the Housing and Planning Act. They will come into force 21 days after being laid”.</p> <p>Wiltshire Council does not appear willing to take these requirements into consideration for the HSAP. Their response to questions submitted to Wiltshire Council’s Strategic Planning Committee by Cllr Ernie Clark, prior to their meeting on 13th September 2017, about the progress of the Town & Country Planning (Brownfield Land Register) Regulations 2017 and asking which sites are anticipated to be listed under Part 2 of the Register has brought the following response: “The Government did not release the data standards that they require Councils to use in the compilation of the Registers and the Planning Practice Guidance on its preparation until July 28th 2017”. Wiltshire Council’s response includes the statement that training would take place during August so that the Register can be compiled by the end of the year. It also states that “it is not envisaged that any (brownfield) sites will be listed in Part 2 of the Register in the first publication”. Therefore because no sites are envisaged for listing “the publication of the Brownfield Register will not require any changes to the draft Wiltshire Sites Housing Allocation Plan (sic)”.</p> <p>Please note: I have passed on the questions raised by Cllr Ernie Clark, and Wiltshire Council’s response, to the Rt Hon Alok Sharma, MP who has taken over from Gavin Barwell as the Government’s Housing & Planning Minister. I have requested clarification of the implementation of the Housing & Planning Act with specific reference to the Brownfield site register.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3323	Consultee Mrs Susan Holt Person ID: 1138930	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Trowbridge			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>In Trowbridge there are a number of Brownfield and Windfall sites which are all within the existing town boundary and could potentially yield building land for more than the number of houses proposed for three extremely controversial green field sites in the draft HSAP. These three green field sites are: Southwick Court fields (HSAP reference 3565), Land at the "Hilperton Gap" (HSAP reference 263/297); and the buffer land between the village of North Bradley and town of Trowbridge (HSAP reference 298).</p> <p>Brownfield/windfall sites which could - and should - be considered are the Bowyers factory, the West Wilts District Council offices at Bradley Road, the East Wing at County Hall, the Ashton Street Centre, the Virgin Media Pavilions on the White Horse Park, and Margaret Stancomb school/the area around Trowbridge Hospital. Most have been standing unused and/or derelict for many years, and are either Wiltshire Council owned or have been purchased by developers who have made no attempt to build on them, even though some sites already have at least outline planning approval. Less than half of the indicative requirement for housing in Trowbridge for the period 2006-2026 has been built to date which would seem to indicate a lack of interest in fulfilling this requirement on the part of developers [6,810 dwellings proposed, 2,625 built].</p> <p>I would urge you to consider these issues when the draft HSAP is placed before the relevant committees and cabinet so that the three green field sites identified in section d) above are removed from the Plan and available brownfield sites within the town of Trowbridge are utilised. Removing the eyesores of derelict buildings and also areas which are cleared, but surrounded by high wooden fencing such as the Bowyers and West Wilts District Council office sites, would bring a dramatic improvement to the visual appearance of the town and maybe encourage outside investors to consider it for future business development purposes.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3324	Consultee Miss Sue Wright Person ID: 393855	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Other		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	Salisbury			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>(1) I consider the WHSAP is not positively prepared in relation to the sites listed above because the lack of a proper Salisbury Transport Strategy or any Wiltshire Green Infrastructure Strategy means that development and infrastructure requirements cannot be objectively assessed and it cannot be considered as being consistent with sustainable development. Wiltshire Council should have brought forward a proper full Salisbury Transport Strategy and Green Infrastructure Strategy first and then proceeded to a Housing Site Allocation Plan.</p> <p>(2) In the absence of a proper Salisbury Transport Strategy or a Wiltshire Green Infrastructure Strategy, it is not possible to tell whether the plan in relation to these sites can be justified or not. It may be that there are alternatives that would better meet the strategic objectives of the transport strategy and green infrastructure strategy that should but do not exist. The air quality impacts, both the individual and combined effects, of the three site allocations to the south of Salisbury do not appear to have been taken into consideration at all. In the absence of a proper transport strategy and green infrastructure strategy, and considering the likely adverse impacts on air quality and the health of the local population, a reasonable alternative would be to allocate sites only for the indicative residual requirement of 173 dwellings at Salisbury and Wilton and to wait until there is a proper strategy for transport, green infrastructure and air quality before allocating sites in excess of this figure.</p> <p>(3) The actual housing numbers may or may not be deliverable over the period but it cannot as it stands deliver sustainable housing development because of the likely transport and air quality impacts.</p> <p>(4) It is not consistent with national policy because, in the absence of a proper transport strategy and green infrastructure strategy for the Salisbury area, it is almost certain to adversely affect air quality in the city. Wiltshire Council needs to identify first how it can achieve and sustain improvements in air quality in its Air Quality Management Area in order to comply with EU limits and national guidance before bringing forward additional housing sites for consideration. Withdraw these sites from the plan.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3325	Consultee L and S MacDermott and Eddleston Person ID: 1138955	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.4 Church Lane			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We live at 2 Church Lane, Upper Studley BA14 OEH. Along with our neighbours at St John's Church and 344 Frome Rd and Rose Cottage, Frome Rd, our property is grade 2 listed. According to the listing guidelines and development pertaining to such properties, any development has to fit certain criteria. This is not simply the structure of the listed building but location, context and surrounding. Any development that is obviously visible from the said listed buildings is detrimental to the buildings themselves which have been listed intrinsically with the location.</p> <p>Our address is 2 Church Lane. It is not Off the M 4 next to a housing estate. The setting is the lane, the church, and the extent thereof being the parish boundary. Any development affecting this setting is contrary to policy: local government, town and national planning. Section 66 of the Listed Buildings Act states that in planning the Council must pay particular regard to protecting the setting of listed buildings. Whilst we appreciate planning and development are necessary, it is fairly obvious that the council gets it wrong sometimes. As an example whoever gave planning for the "lead bunkers" to be stuck on the side of St John's Church in 1980 obviously was either mad or had no idea of what a Victorian gothic church was or is.</p> <p>So, in conclusion, to avoid incorrect planning decisions, any development in the fields (marked X and Y on the Historic England page included) along Church Lane would be inappropriate from a town development point of view (the buffer zone between villages being taken up, the apparent attempt to change parish boundaries ie. Church Lane, the destruction of a setting that has been unchanged since the church and associated buildings were erected in the mid 19th century). There is no justification in planning law to ignore the legal standing of a listed building when it has been listed for very specific reasons.</p>				
Attached files (Please see Objective)	4752090				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3326	Consultee Anon	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138958	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to state my opposition to the inclusion of Site 3565 [fields adjacent to Southwick Court] in the Trowbridge Site Allocation Plan. We have lived in Westmead Crescent for nearly 38 years and our family have grown up enjoying the fields close by, whether it be the wildlife regularly seen, playing football, walking the dog, or just enjoying the beautiful open space</p> <p>The land has been used by many generations for its current use of farming and recreational space and is a valuable asset to the local community.</p> <p>The site has been opposed by the Town Council and alternatives for a greater number of dwellings proposed.</p> <p>There is no need to forever lose this valuable space.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3327	Consultee A Shodly Person ID: 1138939	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.		Warminster		Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I object most strongly to any change to existing settlement boundaries and further allocation of new housing sites within Warminster, as your draft plan is not sound for the following reasons:</p> <p>Positively prepared - the plan has not been prepared to meet objectively assessed development with sufficient supporting infrastructure. In Warminster, the draft plan is not consistent with achieving sustainable development but merely seeks to increase housing numbers in case Wiltshire cannot achieve an overall housing target by 2026. Further, the changes to the settlement boundaries for East of Dene and Boreham/Spurt Mead are not required and are illogical. In the case of the East of the Dene site this will allow developers the opportunity to further speculatively develop beyond the proposed draft plan. Finally, it fails to review viable alternatives; for example, increasing the West Urban Extension housing numbers; a site which is capable of significant expansion.</p> <p>Justified- The draft plan for Warminster is not an appropriate strategy, when compared with other reasonable alternatives, based on proportionate evidence. The Wiltshire Core Strategy, after careful analysis, selected the Warminster West Urban Extension as the site for development which was then ratified by a Planning Inspector. This site can absorb the perceived housing shortfall to 2026 and more importantly provide the supporting infrastructure making the site sustainable.</p> <p>Effective - The draft plan is in danger of not delivering over its period unless Wiltshire Council forces developers to start approved development and it is not based on effective joint working on cross-boundary strategic priorities. The plan is merely a reactive solution to a perceived shortfall in housing targets.</p> <p>Consistent- The draft plan is not consistent with national policy, the Core Strategy or Warminster Neighbourhood Plan. Wiltshire Council's Flood Risk Policy 67 requires new development site selection to comply with the National Planning Policy Framework (NPPF), and the specific policies created in the Councils Strategic Flood Risk Assessment (SFRA). By adhering to these policies, Wiltshire manages and reduces the risk of flooding. The NPPF and SFRA require all selected sites to prove they have passed a sequential flood test based on the details in the SFRA. For areas at higher risk of flooding, which Warminster is recognised as being, safe site selection requires more detailed assessments by either a SFRA Level 2 or a Surface Water Management Plan (SWMP). This has not occurred in Warminster, but has occurred in other Wiltshire Towns and large villages, therefore Wiltshire should reject this draft site selection.</p> <p>For the above reasons, I most strongly object to any change to the housing numbers and settlement boundaries within Warminster proposed by the draft Wiltshire Housing Site Allocations Plan. Further, I would like my objection highlighted for the Planning Inspector examination scheduled for spring 2018.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to					

participate at the oral part of the examination?	
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Comment ID:	3328	Consultee Anon	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138958	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The field system is a recognisable part of our heritage and dates back hundreds of years in its current form.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3329	Consultee Anon	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138958	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Housing on this site would not only contradict Government policy of building on Brownfield Sites in preference to Greenfield, but would cause massive problems in its creation and existence for current residents.</p> <p>Please can our pleas be taken seriously. There are plenty of other more suitable sites in the Trowbridge area, ie. Bowyers site which has been derelict for many years; the ex Virgin offices and car park, the old West Wiltshire District Council offices, to name but a few.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3330	Consultee Anon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138958		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Given that much of the building would take place in an area of notified flooding and standing surface water, the existing residents would have their property seriously threatened by an increased risk of flooding. I personally have witnessed flooding in the field adjacent to Westmead Crescent every year, once flooded, tends to last for many months.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3331	Consultee Anon	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138958		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The people who live in Southwick and North Bradley want to retain separate communities and to not become part of Trowbridge. Traffic will be a problem and Bradley Road and Frame Road, will become even more busy.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3332	Consultee Miss Barbara Laws	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	Yes
		Person ID: 1138954		Do you consider the draft WHSAP is sound?	No
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Justified	
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1		Effective	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Harnham (both east and west) is already highly congested both morning and evening. The roundabout where A338 and A354 bring traffic into Salisbury is blocked already at rush hour times and 640 more dwellings would produce gridlock for all concerned. The phrase '@refresh the transport strategy' is meaningless if not spelt out as to what this would entail. Specific proposals for improving the transport network must be submitted for consideration and public consultation before any final site allocations plan can be approved.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	<p>To add weight to the mass of opinion in Harnham that this development is unacceptable because of its size and the transport system in Salisbury.</p>				

Comment ID:	3333	Consultee Cllr David Halik Councillor	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Wiltshire Council Person ID: 1138856		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	In regards to Southwick Court housing allocation – updated information on Flooding in the area				
Attached files (Please see Objective)	4752107				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3334	Consultee Miss Janet Saunders	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138982	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.1			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed planning for buildings: Netherhampton Lane, Salisbury. With reference to Salisbury journal applications to build Netherhampton Road, Salisbury – opposite the Earl of Pembroke's estate wall on other side of road. I am very much against the proposed planning application to build there. The ground there is extremely damp and often flooded, particularly in winter. The previous Salisbury MP Robert Key was against any building there, particularly as the ground is often very damp and can be flooded (especially in winter). My other reasons I am against any building there is already in Netherhampton we have to be extremely careful when we get water from our taps inside our properties, as often Wessex Water appears to be putting too much horrible treatment agent in the water, so any further building in the area would make it even more difficult for me as a resident in Netherhampton to get decent water.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3335	Consultee Mrs Clare Churchill Clerk to the Parish Council	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Quidhampton Parish Council Person ID: 1123514		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Whilst none of the sites proposed are within the parish boundary the proposed sites at Netherhampton, H3.1 and H3.3, will have implications for the parish.</p> <p>Flooding. The site H.3.3 is a site that suffers from groundwater flooding and during winter months and heavy rain, standing water in the land is clearly visible from the highway. Any development on this site is likely to cause flooding both up and down stream and this must not be allowed to happen. In 2013 there was serious flooding in Salisbury at the Cathedral Close (so serious it resulted in a visit by the Government Minister) and also at Britford, both these locations are just downstream of the proposed site. Therefore this site is not suitable for development and should be disregarded</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3336	Consultee Mrs Clare Churchill Clerk to the Parish Council	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Quidhampton Parish Council Person ID: 1123514		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Whilst none of the sites proposed are within the parish boundary the proposed sites at Netherhampton, H3.1 and H3.3, will have implications for the parish.</p> <p>Infrastructure The A3094 is a busy road and the Harnham gyratory is already considered as working to capacity, further development along this road will result in additional traffic that will either add to the congestion at Harnham or add to the congestion on the A36 of traffic travelling to Wilton. In recent years the Park Wall junction was looked at and it was agreed that no change could be made to the existing layout in that all traffic must turn left and go around the roundabout at Wilton to proceed to Salisbury. This section of road is busy and frequently congested therefore any additional traffic will exacerbate the problem.</p> <p>There is already a serious problem of traffic using Quidhampton as a rat run to access Salisbury, to avoid using the Park Wall traffic lights and the congested A36, causing congestion and a risk to pedestrians due to the lack of pavement in half the village. Any development in Netherhampton must address this serious traffic issue for the parish of Quidhampton.</p>			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3337	Consultee Mrs Clare Churchill Clerk to the Parish Council	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Quidhampton Parish Council Person ID: 1123514		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Netherhampton Road, Salisbury			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Whilst none of the sites proposed are within the parish boundary the proposed sites at Netherhampton, H3.1 and H3.3, will have implications for the parish. Services The reports highlight that there is a lack of GPs, to increase housing without any provision for GPs is unacceptable. Quidhampton parishioners often struggle to get a doctors appointment so provision must be made for additional GPs before any proposed development is permitted				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3338	Consultee Miss Janet Saunders	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138982		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H3.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed planning for buildings: Netherhampton Lane, Salisbury. With reference to Salisbury journal applications to build Netherhampton Road, Salisbury – opposite the Earl of Pembroke's estate wall on other side of road. I am very much against the proposed planning application to build there. The ground there is extremely damp and often flooded, particularly in winter. The previous Salisbury MP Robert Key was against any building there, particularly as the ground is often very damp and can be flooded (especially in winter). My other reasons I am against any building there is already in Netherhampton we have to be extremely careful when we get water from our taps inside our properties, as often Wessex Water appears to be putting too much horrible treatment agent in the water, so any further building in the area would make it even more difficult for me as a resident in Netherhampton to get decent water.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3339	Consultee Miss Janet Saunders	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138982	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Salisbury Transport			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>The proposed planning for buildings: Netherhampton Lane, Salisbury. With reference to Salisbury journal applications to build Netherhampton Road, Salisbury – opposite the Earl of Pembroke’s estate wall on other side of road. I am very much against the proposed planning application to build there. It would also make too much traffic in the area.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3340	Consultee Mr and Mrs Wenham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		I wish to respond to the above draft plan, with specific reference to paragraphs 5.77-5.84, the "Southwick Court" proposed development, Ref H2.6. The main grounds for my objections are: The plan is not sound or effective. Most of the land included in this plan at Southwick Court is used extensively by the community for recreational purposes and legally the people should have the right to protect it. Local residents use this land on a daily basis to enjoy lawful sports and pastimes including dog walking, flying model aircraft, picnics, ball games and others. Thus, this area is qualifies as village green status and should be protected as such by Wiltshire Council. These lovely green fields act as a buffer zone from Southwick and have three public footpaths running across it.			
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3341	Consultee Mr and Mrs Wenham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	No vehicular access has been identified and if Frome Road is prevented by The Heritage Impact Assessment no other access is practical. One of the options with access from Silver St Lane is totally impractical. This road is a residential cul de sac that was never intended to accommodate further traffic. Silver St Lane itself has already been turned into a rat run as all traffic comes through to avoid speed humps on College Road. Hazel Grove residents have insisted that all of the Road will be restricted parking so parents are now using Silver St Lane and Balmoral Rd to park and drop off school children to Grove School. This is already causing problems traffic problems/ safety issues in this area and can not cope with anymore traffic at this junction. Traffic through any of the access options will destroy the peace and tranquility of the existing houses beyond measure.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3342	Consultee Mr and Mrs Wenham	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138984	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Trowbridge acts as a base for people working in Bath, Bristol and Swindon who want cheaper accommodation. the County Council has successfully developed brownfield sites in Bradford on Avon and the Ushers site in Trowbridge for housing. Several brown fields sites are suitable for future development such as the former Bowyers site and land off Bythesea Rd.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3343	Consultee Mr and Mrs Wenham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The land suffers from serious flooding which already has a major impact on houses in this area with the drainage system, more housing would only add to this major issue. Due to the high quantity of clay underlying the simple there is no run off of any surface water.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3344	Consultee Mr and Mrs Wenham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	The site is a natural habitat for bird and animal species, including bats and developing this site would damage and remove this including important and protected hedgerow.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3345	Consultee Mr and Mrs Wenham	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138984		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	On this site is also extremely rare post-medieval earthworks that will be destroyed.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3346	Consultee Mrs D Paris	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1110188	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.4 East of Lavington School			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	It seems to me that Market Lavington has already far exceeded the boundaries which it should naturally have kept to. A mistake was made as early as the 1930s (I think) when development was allowed along The Spring towards West Lavington, so that there is now almost no division between the two villages (and Littleton Pannell). Your proposals will compound this awful mistake. The idea of buiding on land to the east of Lavington School, with access via the school drive, is absolutely preposterous. I have never visited this bit of land, but it looks, from the top of The Plain, as though it has a number of fine, mature trees, so this would make the proposal doubly repugnant.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3347	Consultee Mrs D Paris	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1110188	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.2 Underhill Nursery, Market Lavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Similarly, your two other proposals, at the nursery and Southcliffe Road, would push the boundaries of the village out further, towards Easterton and up the slopes of The Plain, both highly undesirable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3348	Consultee Mrs D Paris	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1110188		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H1.3 Southcliffe			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Similarly, your two other proposals, at the nursery and Southcliffe Road, would push the boundaries of the village out further, towards Easterton and up the slopes of The Plain, both highly undesirable.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3349	Consultee Mrs D Paris	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1110188	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Market Lavington			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	If Market Lavington has to have more houses, which it really should not because of the chronic traffic problems which cause gridlock in the High Street almost on a daily basis, then those houses should be right in the middle of the village, for instance on the site immediately to the south of The Clays, which I think has already been designated as suitable for development.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3350	Consultee Mr William Hall	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1138993	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.3			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Market Lavington Village Boundary My neighbour Mr Slater Reynolds at Parsonage Mead, who has made a representation on my behalf in connection with our shared rear drive (which clearly should be included in the village envelope), has drawn to my attention the boundary of Clyffe Hall. While it seems the criterium being used is to include garden but not adjoining amenity land, if this is the case I suggest our "walled" kitchen garden and our front drive should be within the boundary. I attach a plan with the suggest amendment outlined in green.</p>				
Attached files (Please see Objective)	4752171				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3351	Consultee Mr David Minns Prime Meridian	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1139002	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.50 North Bradley Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We note the proposed change to the Village Boundary of North Bradley. Part of our client's land is included within the enlarged boundary at the south west of the village, and we write on behalf of our client in support of this boundary change. The attached plan shows the landholding edged in blue.</p>				
Attached files (Please see Objective)	4752188				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3352	Consultee Mr Simon Peters	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1139012	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.40 Seend Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I live in Seend, and in particular, Seend House, High Street, Seend, Wilts SN12 6NR.</p> <p>I have reviewed the Seend settlement boundary map and I am surprised at how the boundary crosses my property. Historically a lot of the houses on the south of the ridge were outside the settlement boundary and under the recent review the boundary has been dropped south to include all the houses but not necessarily all the gardens, which in concept I can understand and do not have a strong view on. However, when it comes to my property although the house is included (and gardens to the south are excluded as with other houses) it seems odd that most of my garden to the north has been excluded, with what looks like a weird looping arrangement over my property, which seems at odds with how other houses have been treated.</p> <p>Can I ask you to review this looping boundary? I would have thought a more logical fit, consistent with how the other properties in the village have been treated, would be to continue the southern boundary west to join my neighbour, rather than an odd loop.</p> <p>I have no strong view whether you should or would want to exclude, or include my property. However, it looks like to be consistent with other properties, the boundary should continue along the southern edge of my house.</p> <p>Ideally could I ask someone to review the map and see if what I am saying makes sense and if so to change it to be more consistent with what looks like the same criteria as other properties?</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3353	Consultee Mr Tom Rutt	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1139015	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.49 Hilperton Settlement Boundary			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>We are representing the owner of Maxcroft House in Hilperton.</p> <p>Whilst discussing we have all become aware that the OS map boundary shown in your Site Allocations Plan is slightly out of date I'm afraid.</p> <p>We also attach a markup showing the site itself and the older boundary and the new boundary. The old boundary with the 'curved bump' in it has not been in existence for 30 years. The house boundary is as per the redline marker on the plan.</p> <p>We would like for Site Allocations Plan to show the accurate current situation in this case.</p> <p>We realise the consultation period just ended but this has only just come to the owners attention now, and whilst the plan is still in Draft Stage, hopefully the error can be corrected.</p>				
Attached files (Please see Objective)	4752199				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3354	Consultee Mr A W Watts	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119432	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Housing delivery strategy			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	[representation providing further context to the comments made under Comment ID 84, in support of an omission site at Hawkeridge]				
Attached files (Please see Objective)	4752204				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3355	Consultee Mrs Penny Long Person ID: 1139017	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Do you consider the draft WHSAP is sound?	No		
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Site		Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Positively prepared	
Please identify the policy, paragraph, table, figure or site to which you are referring.	H2.12			Justified	
				Effective	
				Consistent with national policy	
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Ref: Wiltshire Housing Sites Allocation Plan I am writing to raise my concerns in relation to the above public consultation event. I would like to object to the allocation of housing site 482 adjacent to Farrells Field, Yatton Keynell, which is proposed for 30 houses. I consider the proposal unsustainable & will have a negative impact on the future of the village. I have the following concerns about how the selection process of the site has evolved. I believe the plan is unsound & not consistent with national Planning Policy for the following reasons. 1) No evidence of housing need in Yatton Keynell. (See para 158 of NPPF) Appendix E of the Chippenham Community Area topic paper confirms no local housing needs survey was undertaken as part of the plan. The proposed dwellings should be justified with evidence of a specific local need. 2) Lack of a Neighbourhood Plan (Para 159 of NPPF) At a Parish Council Meeting in 2014 there was a call for a Neighbourhood Plan so residents can engage in how many & where future housing may take place. 3) Site selection process unsound. (Para 159 of NPPF) Sutton Benger has an identified need & no housing has been allocated. Yatton Keynell has no identified need yet 30 houses have been allocated. 4) Infrastructure issues Drainage is considered to be a fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to limited drainage supply capacity in local distribution mains, & that there is a potential need to serve the site by pumped connection for foul water, & the site falls within a groundwater vulnerability area. 5) Poor Consultation (Para 155 of NPPF) None of the Parish Council's from 5 villages in the Chippenham Community Area responded to Wiltshire Council's consultation on the Site Allocations Plan & Settlement Boundary review. This raises the question about the quality of the consultation that has taken place in order to create the plan, & whether the Council has met the necessary requirements set out in its Statement of Community Involvement. 6) Proposal will have significant impact on the character of the area. A large scale development of 30 houses at the entrance to the village is not sustainable, & will have a negative impact on the character of the village. In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in the village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level. Withdraw the land East of Farrells Field to allow a Neighbourhood Plan to be prepared, giving local residents opportunity to explore other site options in line with NPPF.				
Attached files (Please see Objective)					

If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

Comment ID:	3356	Consultee Mrs Penny Long	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1139017		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>1) No evidence of housing need in Yatton Keynell. (See para 158 of NPPF) Appendix E of the Chippenham Community Area topic paper confirms no local housing needs survey was undertaken as part of the plan. The proposed dwellings should be justified with evidence of a specific local need.</p> <p>3) Site selection process unsound. (Para 159 of NPPF) Sutton Benger has an identified need & no housing has been allocated. Yatton Keynell has no identified need yet 30 houses have been allocated.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3357	Consultee Mrs Penny Long	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1139017	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	4) Infrastructure issues Drainage is considered to be a fundamental constraint on the land adjacent to Farrells Field. It is acknowledged in the Council's Sustainability appraisal that the moderate adverse effects related to limited drainage supply capacity in local distribution mains, & that there is a potential need to serve the site by pumped connection for foul water, & the site falls within a groundwater vulnerability area.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3358	Consultee Mrs Penny Long	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1139017		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	5) Poor Consultation (Para 155 of NPPF) None of the Parish Council's from 5 villages in the Chippenham Community Area responded to Wiltshire Council's consultation on the Site Allocations Plan & Settlement Boundary review. This raises the question about the quality of the consultation that has taken place in order to create the plan, & whether the Council has met the necessary requirements set out in its Statement of Community Involvement.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3359	Consultee Mrs Penny Long	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1139017		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	6) Proposal will have significant impact on the character of the area. A large scale development of 30 houses at the entrance to the village is not sustainable, & will have a negative impact on the character of the village. In light of the above, I urge Wiltshire Council to withdraw the allocation of land at Farrells Field and work together with the Parish Council to produce a Neighbourhood Plan for Yatton Keynell which will explore whether there is a specific housing need in the village. A Neighbourhood Plan will also enable the villagers to have more say in where future housing could go rather than one site being allocated at County level.				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3360	Consultee Dr J E Holdsworth Person ID: 1139309	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I write with regard to the Wiltshire Housing Site Allocations draft plan and specifically the Land to the East of Farrells Field (Site 482). I am a resident of Farrells Field and we put our house on the market in July with the intention of moving to Bath. We have had 8 viewings since then. Three indicated that they really liked the house and garden, but did not proceed, giving the reason that they could not commit to purchase here with the uncertainty regarding future development on the land east of Farrells Field. Two other prospective viewers pulled out of viewing for the same reason. In particular prospective buyers have mentioned worries about proposed vehicular access via Farrell's Field. I wondered where prospective buyers were sourcing their information regarding access, as I understood that no firm decisions had been made regarding a preferred route because on page 81 of the Wiltshire Housing Site Allocations Plan Community Area Topic Paper –Chippenham Community Area published in June for the consultation, it states:</p> <p>“Direct vehicular access to this site is considered to be achievable either from the B4039 or through Farrells Field which has a footway. “</p> <p>Yet, when I looked at the Chippenham Community Area Remainder section of the Wiltshire Housing Site Allocations Plan on the council website, I note that under H2.12 East of Farrells Field, the wording pertaining to access is:</p> <p>“Access would be taken from Farrells Field and the possibility to link to adjacent footpaths should be explored”</p> <p>Please can the council explain the process that it has used to move from a position of noting two possible access routes to stating only one and why this wasn't made clear in the consultation document?</p> <p>Surely this should be decided through the eventual planning process in the event that the site is approved.</p> <p>I note too that responses to the consultation are now available for viewing on the council website and was concerned to see the response from Persimmon Homes (owner of the land proposed for development) which includes the statement:</p> <p>“The intention is to access the site from the existing development at Farrells Field” and includes a diagram to further emphasise this.</p> <p>Please can the council indicate why Persimmon appears to have been made aware of this new intention to access only via Farrells Field, yet the residents and those living locally have not.</p> <p>The Parish Council in its response to the consultation has also stated that it would not support direct access through Farrells Field, yet it too does not seem to have been made aware that this is now the intention.</p> <p>I spoke to somebody in the Spatial Planning office last Friday and was told that we are unlikely to have any clarity about the final agreed sites for development until Winter 2018. And so it will be beyond then when any plans are available for consideration or comment. For those trying to sell a home now this offers little comfort and is likely to result in the need to either sell well below market value or stay put. If access is confirmed via Farrells Field this will result in the developer gaining through lower access costs at the expense of the individuals who already live here.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you					

**consider it necessary to
participate at the oral part
of the examination?**

Comment ID:	3361	Consultee Ms Megan Hughes	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1118606		Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>I am writing to show my support for Graham Hill who has set out all the points to stop the development of Southwick Court Farm. I enclose the document to me and I agree with everything especially part 3 about building on brownfield sites.</p> <p>I do hope you take note of all that is mentioned and agree with Trowbridge Town Council who has already rejected the site.</p>				
Attached files (Please see Objective)	4756599				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3362	Consultee The Rt Hon. James Gray MP	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 397149	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.12 East of Farrells Field, Yatton Keynell			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally complaint / sound.	<p>I write on behalf of more of my constituents who have contacted me with their grave concerns about the Wiltshire Housing Site Allocations Plan - Land East of Farrell Fields (Site 482).</p> <p>As you know, I wholly agree with my constituents and strongly oppose the application which, in my view, would encourage urban sprawl far too close to an Area of Outstanding Natural Beauty. I enclose copies of my constituent's self-explanatory emails for your interest and comment.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3363	Consultee Ms Karungi Grant	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1143232	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.54			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>At the PC meeting held on 13th November, members of the electorate attended the open forum to seek PC's support in re-submitting a late representation for a boundary limit.</p> <p>I am aware that the draft proposal boundary limit that has been published and that we have missed the deadline. I have no record of receiving any communication on the consultations or deadlines for submission.</p> <p>Please accept my apologies for not responding within the timescale and I hope you are able to consider this late representation or advise on the way forward.</p> <p>PC also noted that the proposed boundary limits do not include any of the submissions that were proposed in 2014/15.</p>				
Attached files (Please see Objective)	4797685				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3364	Consultee Robert & Shiona Smith Person ID: 1143251	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
				Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.54			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.		<p>Re: Late representation regards the proposed Codford policy boundary and Specifically Grid Reference F5 We apologise for not responding within the allocated time for comments on “Wiltshire Housing Site Allocations Plan, Pre-submission draft plan, Community Area Topic Paper – Warminster June 2017” but we have been patiently waiting for the proposal of the revised Village policy limits to be brought into the published public domain, and were unaware that we should have made representation earlier. For 15 years we have been supporting the application of Mrs Jane MacFadyen and Mr.Tim Anderson regarding the proposed dwelling on land they own at the rear of our property, Codford Grid Reference F5. Their original application in 2002 had the wholehearted support of the neighbours, several villagers and the Parish Council when it went before the Southern Area Planning Committee and a number of the neighbours and Parish Councillors attended the meeting. It was stated at the beginning of the meeting that the then head of Planning recommended the rejection of the application, but after the proposal had been explained and support expressed by those attending the Southern Area Planning Committee unanimously approved the application, and requested that such approval be minuted. At this point the then planning officer raised a point of order that the approved application had to go before the ‘Regulatory Committee’ as the application was outside the village policy limits. Unfortunately this was unable to be ratified as this Committee was abolished before the approved application could be brought before it, and the approved application then had to be re-submitted to the full planning committee and despite supporters from the village attending this second meeting and speaking in its favour, it was refused in the form it had been presented. We were then informed that there was to be a revision of the Village Policy Limits and understood that the whole purpose of the revision of the Village Policy Limits was to enable the demarcation line to reflect the wishes of the Parish Council and the local community but were appalled when we were informed only a few days ago that the variation of the Village Policy Limits had been finalised but not as we had been led to believe. We had understood that the demarcation line was to be drawn in a manner that would be logical and easily identifiable, following the property boundaries and would include the land owned by Mrs MacFadyen (now Mrs Anderson), and that her proposal to build herself a family home on such land was going to be encouraged. But the amount of land as shown on the proposed policy boundary is not large enough for her to implement the building of a home. The barn which is currently situated on the site is very decayed and dilapidated and has become a very unpleasant eyesore, both to the immediate houses surrounding the plot and as one enters the village from the West. In addition the map of Codford referred to under A3 is at least 18 years out of date and shows features that are incorrect as a result of which wrong conclusions are drawn. The area upon which she proposes to build is bounded on the East by the house and garden of Little Ashton; on the South by an approximately 15ft high bund dropping down to the A36; on the West by a tiny piece of field owned by a villager; and on the North by the house numbered 124 High Street and our house, Moonrakers. The only vehicular access to the land owned by Mrs Anderson is the 10ft driveway between 124 High Street and our house, Moonrakers. There was a question of egressing vehicles and limited visibility splay, but these were addressed to assist</p>			

	<p>Mrs Anderson. Because of the siting and size of the land, it has very limited use, is useless for agricultural purpose, too small for commercial use, but ideal for the proposed sympathetically built home. In addition it would only enhance the visual appearance of the western approach to the village.</p> <p>After this matter dragging on for 15 years we are now totally in despair that our lack of knowledge regarding the Pre-submission Draft may affect the outcome. We understood that the whole purpose of the revision of the Village Policy Limits was to enable the demarcation line to reflect the wishes of the Parish Council and the local community, which appears not to have been followed. After waiting 15 years for the planning policy of the community to be implemented the thought that apparently the wrong resolution is being offered is totally unacceptable and undemocratic. We have been advised that the information should have been received by the Parish Council and subsequently published in the Community Newsletters under the report of the Parish Council. This dissemination of information seems somewhat casual as it relies totally upon local parish council matters being sent out in a method that is not completely foolproof. In addition, there is a subscription charge for the Ashton Gifford Community News Magazine, serving Codford, which unless you subscribe you do not receive. Therefore the general community may not be aware of any parish news that might affect them, which as in this case has a very strong impact on them, which again is hardly democratic. We would therefore beg leave to have our late representation in respect of Grid Reference F5 regarding the proposed alteration to the policy boundary, to be adjusted in order that sufficient land is available for the proposed building of her family home and that full consideration to this proposal be given in a favourable manner.</p>
<p>Attached files (Please see Objective)</p>	
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3365	Consultee Jane & Tim Anderson Person ID: 1143253	Agent Person ID:	Do you consider the draft WHSAP is legally compliant?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?	Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:	Do you consider the draft WHSAP is sound?		
Please identify the policy, paragraph, table, figure or site to which you are referring.	A.54				
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Late Representation;- Codford Grid Reference F5</p> <p>Please accept our apologies for not responding within the time scale for comments on the “Wiltshire Housing Site Allocations Plan, Pre-submission draft plan, Community Area Topic Paper – Warminster June 2017”. While this is a private representation we understand the Codford Parish Council will be making their own Late Representation.</p> <p>The Codford Parish Council commented on the document titled “Draft Proposal for Revised Settlement Boundaries, Initial Informal Consultation with Parish and town Councils” The Parish Council advised the Spatial Planning team of the amendments to this document that would benefit the community and requested they be included in the revised Settlement Boundaries for Codford. The Parish Council were of the understanding that as they had advised the Spatial Planning team of the local requirements that was the end of the process. Assured by the Parish Council that the proposed settlement boundary was resolved we did not consider or were aware that the correct procedure had been overlooked.</p> <p>It was by chance we became aware of the variance between document Wiltshire Housing Site Allocations Plan Pre-submission draft plan Community Area Topic Paper – Warminster June 2017” and the settlement boundaries as discussed with the Parish Council through submitting a pre-advice application to Wiltshire Planning Department but unfortunately the results came after the close date of the 22nd September 2017. It should be noted that we are not alone in not being informed, there was no process in place to advise the community of Codford of the opportunity to engage with the proposals of WHSAP Pre-submission draft plan Community Area Topic Paper – Warminster June 2017.</p> <p>The Objection</p> <p>This representation concerns the failure of the policy boundary as published in “Wiltshire Housing Site Allocations Plan, Pre-submission draft plan, Community Area Topic Paper – Warminster, June 2017” to reflect the Codford Parish Councils specific requirements to include a section of land identified in their advised amendments of the “Draft Proposal for Revised Settlement Boundaries, Initial Informal Consultation with Parish and town Councils”. The location of the land is grid reference F5/6 with a SHLAA site ref 3114, please note this is not the whole area. We request you review this omission and find the community is best served with the inclusion of the boundary around F5/6 as requested by the Codford Parish Council.</p> <p>Matters For Consideration</p> <p>The basis for the Parish Council supporting the policy boundary being extended to include part of the site is to end a 20 year “blot” on the landscape by improving the visual impact when entering the village from the west by allowing the large degrading stone-oak barn and old dairy to be replaced with a family home. The current barn is in the north west corner of the site 1 to 3m from the garden of 124 High Street, Codford, is a prominent feature, the ground is elevated at this point and when approaching Codford from the West along the A36, the image portrayed is negative, a community that is unable to move on, an illustration of stagnation. The village maps used in the Spatial Planning proposal are at least 19 years old and do not represent the features that exist, the extent of the garden to 124 High Street are not shown, the width of the lane to the site includes the driveway of 124 and gives the impression that it could accommodate two lanes of traffic and the very large double garage belonging to the house Moonrakers is missing. The immediacy of the barn and old dairy have a demeaning relationship with the neighbouring</p>				

five properties, the community and the Codford Parish Council using their local knowledge consider the buildings to be physically related to the settlement, not countryside and in need of change. This is further demonstrated by the public infrastructure, the site is bounded on three sides by roads, the A36 and 5m high earth bund on the south side, a house named Moonrakers and 124 High Street on the North, the High Street access road to the A36 on the West with Little Ashton on the East. This is not open countryside; the site is too small for agricultural purposes and has no desirable commercial application. The argument for equine use, generally the default is not a viable solution, the site does have 4 stables a legacy that predates the A36 bypass, over time the A36 has grown to present a very dangerous obstacle as grazing and prime riding requires crossing the road at a point where there have been many vehicle fatalities. These factors and the especially high cost of insurance and issues with waste management negate equestrian use of the land. The site does suit a single home, replacing the existing barn and old dairy with will have a minor extension to the settlement built form but will provide a positive change to the community with minimum impact.

It is also recognized that while improving the community's social wellbeing the inclusion would also compliment the AONB, provide some environmental improvements, directly help the economy of the village and make a small contribution to the housing requirements of the locality.

In summary: -

The site has large areas of concrete oversite which will be reduced improving water retention.

The site has an existing septic tank which would be replaced with a treatment plant that removes the phosphate risk

The residential unit would be circa 150m from the local shops, 20m from the bus stop.

The property would be constructed to minimize the carbon footprint through choice of materials, mitigate heat loss and carbon use by a high standard of fabric insulation and airtightness with the adoption of low carbon technologies to service the home.

Provide an additional property to the Wiltshire housing requirement plan

Provide additional revenue to the village

Support the village community in a positive but sympathetic manner putting the land in to sustainable use and visually improving the site line from the West and the immediate properties.

Owner's Intention and Brief History

The owner of the site is Jane Macfadyen now Jane Anderson, who has owned the property since 1990 and is still the owner and has an intention if permitted, to build and live in a property on the site. Jane applied for planning permission to convert the barn and old dairy in 2002, was supported by the Parish Council and circa 20 householders in the village whom wrote to the Planning Department in support of the application, there was no dissent from the Codford Community.

The original application went to the Southern area planning committee with the wholehearted support of the neighbours, several villagers and the Parish Council many of whom attended the meeting. There was a Highways objection, withdrawn after the two neighbouring properties confirmed in writing that they would make the adjustments to their front dwarf garden walls to increase visibility. This support is still provided by the same neighbours the owners of 124 High Street and Moonrakers.

It was stated at the beginning of the meeting by the then head of Planning that she recommended the rejection of the application, but after the proposal had been explained and support expressed by the neighbours, villagers, and Parish Councillors attending, the Southern Area Planning Committee unanimously approved the application, and it was requested that such approval be minuted.

At this point the then planning officer raised a point of order that the approved application had to go before the 'Regulatory Committee' as the application was outside the village policy limits. This Committee was abolished before the approved application could be brought before it, and the approved application then had to be re-submitted to the full planning committee and despite supporters from the village including parish councillors attending this second meeting and speaking in its favour, it was refused.

Brief Site Overview

The whole site is circa 1.25 acres, the southern boundary faces the A36, the site is protected along this boundary by an earth bund circa 5m high. The East boundary is the fence/wall to the house known as little Ashton which has garden that stretches from the High Street to the boundary fence of the A36. To the West boundary lies a small paddock, then the villages Western access road from the High Street to the A36. The sites Northern boundary follows the rear garden hedge line of the two properties 124 High Street and Moonraker's that sit either side of the 4m wide drive that connects the site to the High Street.

	<p>The site topography slopes from North to South, in the North-West corner at the sites highest point is the stone-oak barn and old dairy and adjacent the earth bund and on the south boundary is a low-pitched barn with 4 old stables. The site is not support by land, isolated from grazing fields and hacking trails that lie South of the A36 village bypass.</p> <p>Appendices</p> <p>Map ~ Draft Proposal for the Codford Revised Settlement Boundaries, Initial Informal Consultation with Parish and town Councils Sept 2014</p> <p>Map ~ Doc A extract from item 1 overlaying Parish Council proposal for including the site within the settlement boundaries</p> <p>Map ~ Codford Proposal for Revised Settlement Boundaries extracted from document Wiltshire Housing Site Allocations Plan, Pre-submission draft plan, Community Area Topic Paper – Warminster, June 2017</p> <p>Map ~ Doc B extract from item 3 overlaying Parish Council proposal for including the site within the settlement boundaries</p>
<p>Attached files (Please see Objective)</p>	<p>4797843 / 4797845 / 4797844 / 4797842</p>
<p>If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?</p>	

Comment ID:	3366	Consultee Mr Timothy John-Garrett Purnell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1119640	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Site	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		H2.6 Southwick Court			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Properties on Balmoral Road and Silver St Lane are going to be negatively impacted by the extra traffic which will inevitably accompany the new houses.</p> <p>The A631 (Frome Road) is the proposed access road for the new houses and school, despite this being an extremely busy road, and as such is an exceedingly unsafe, if expedient, choice for the access road. Furthermore while a new primary school is being proposed, it being a single form entry school means that pupils not of the age academically catered for there will have to study at the existing primary schools. Therefore a new school does not solve the current problem of primary schools in the vicinity being over crowded; extra pupils will contribute to this issue. Increased numbers of parents on the school run (for Grove primary school) will use Silver St. Lane as a parking area and in turn this will exacerbate the existing problem of too many cars parked on a busy road by parents.</p> <p>It is conceivable Waddeton Park Ltd may drop the school proposal and decide to either build more than circa 180 houses or spread the proposed number of houses over a larger area, however the same problems of a busy access road and inadequate educational facilities remain.</p> <p>One last concern is that building on the two fields at Southwick Court may be fobbed off as infill. However most existing houses are all to the north of the two fields (boundary Walk and the newer estate of Spring Meadows, The Poplars ect.), with open space (fields) to the south until met by Wynsome Street, Frome road and the fields to the West, with Axe and Cleaver Lane and a strip of fields along the east side. Therefore in all honesty for the constructing of houses or houses/school cannot be infill.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3367	Consultee Jonathan Kyte	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1144754	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.67			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	I am writing in order to express my concern as it would appear that the pedestrian and vehicular access into Treetops has now been excluded from the area that comprises the revised designated settlement boundary. It is clearly apparent that this is contrary to the settlement boundary review methodology which indicates that the settlement boundary has been adjusted so as to include the curtilage of a property; this is clearly not so in the case of Treetops. I attach a copy of the plan indicating the area of my concern.				
Attached files (Please see Objective)	4807015				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3368	Consultee Barry Oram Administrator for Settlement Trust	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1146217	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Other	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		Latton Village			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>APPLICATION FOR LATTON VILLAGE BOUNDARY ADJUSTMENT.</p> <p>I have been given permission to submit the enclosed application for consideration in the review next year.</p> <p>The application is to move the eastern boundary B to D on the plans of the 2 hectare field currently designated as open countryside to align with the Gosditch Road on the opposite side of the old A 419 as shown on Plan 2 of the enclosed plan.</p> <p>The object of the exercise is threefold. As labelled on the plan.</p> <p>Area 1. To provide a site for two pairs of semi-detached cottages facing the old A 419 An application for this to be made in the next 5 year plan.</p> <p>Area 2. To provide the land and to construct a village tennis court with parking.</p> <p>Area 3. To provide the land for the Parish Council to construct a new recreation hall with parking and services. The old village hall has recently been sold off.</p> <p>We have an agreement with Wiltshire Highways to reconstruct the degraded 175 meter verge shown as A to B on Plan 1. This will be at the applicants expense but with the Highways design and guidance. To be considered as Social Gain for the village.</p> <p>The applicant was responsible in 1998 for the instigation and funding of 160 meters of bund shown as C to D on plan 1 and shown on the enclosed photocopy .The bund is now fully matured and has had a dramatic impact on the village ambience.</p> <p>The new A 419 is now totally screened from the village road and housing on the old A 419. The road noise from the concrete surface of the new A 419 is reduced by at least sixty percent according to Messers RMG who constructed the road. Hopefully a length of some 300 meters will be tarmaced before Messers RMG 's contract expires. The noise residue is still a problem.</p> <p>Again, this should be considered as Social Gain for the village.</p> <p>Trusting that this application can meet with your approval next year.</p>				
Attached files (Please see Objective)	4822649				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3369	Consultee Jill Mitchell	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1157627	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A,54			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	Our attention has been drawn to the inclusion of our property ' the Cottage ' in the revised boundary proposals. However it would appear that only part of our garden has been included. We would like to request that the revised settlement boundary follows the curtilage of our property.				
Attached files (Please see Objective)	4904387				
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

Comment ID:	3370	Consultee Owners of Land off Manor Lane, Baydon	Agent Lee Searles Enzygo Environmental Consultants	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 1157644	Person ID: 1157641	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.		A.9			
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>Following your recent consultation on the draft Wiltshire Housing Site Allocation Plan, please find enclosed representation to support a housing allocation at land off Manor Lane, Baydon, SN8 2JD. Figure 1 below shows the location of the site in orange, which is centred at Grid Reference SU 28066 77837. We seek to demonstrate that the site should be included within the settlement boundary, and should be allocated for housing development.</p> <p>In July 2007 permission was consented for 'Change of use from agricultural to residential hard surfacing and erection of garage extension' through application K/56453/F. This consent has been implemented. In 2008 consent was granted for 'Proposed lobby link, linking the sections of existing and approved garages together also replacing roof window with small dormer window in art studio' (ref K/58403/F). Therefore, the wider site currently benefits from a C3 allocation.</p> <p>Within the pre-submission consultation settlement boundary map (July 2017) the land is shown outside of the revised settlement boundary (figure 2). This is despite the distinct boundary around the site which clearly depicts its connection with the existing property and settlement, and shows a clear separation between the site and the open countryside (figure 3). This is further highlighted by the 'alternative' Public Right of Way which runs around the southern and eastern boundary of the site, clearly delineating the boundary between the village settlement and the open countryside (figure 4). We consider that the existing and proposed settlement boundary does not accurately reflect what is on the ground, and thus it should be amended to encompass the site.</p> <p>The site falls within East Wiltshire Housing Market Area. Within this area there is a requirement for 5,940 houses. Within the Housing Site Allocations Plan, allocations are only made within Principal Settlements, Market Towns and Local Service Centres. Baydon does not fall within one of these settlement tiers, and therefore no housing sites are allocated within the village. Instead, it is left for housing sites to be allocated through the Neighbourhood Plan process. However, no Neighbourhood Plan is being prepared for Baydon, and thus, in this instance, this approach is not appropriate. Therefore, given the site suitability (detailed within the following section), we consider that including the site within the settlement boundary would be the most appropriate approach at this point.</p> <p>Site suitability</p> <p>The site identified is suitable for approximately two bungalows or small properties, in keeping with the existing properties along Manor Lane. We would appreciate your input in terms of the size and style of housing which would be considered appropriate.</p> <p>The site benefits from an existing site access, and is served by water and electricity. The site is in a sustainable location, with a post office, church, school, pub and village shop within approximately 600m. In addition, the village is served by public transport, reducing dependency on private car ownership.</p> <p>In terms of national designations, the site lies within the North Wessex Downs AONB, along with the entire village and wider area. The site is not subject to, or adjacent to other designations. The site comprises grassland, with trees, scrub and hedge around the site. As part of any development, an ecological assessment and tree survey would be undertaken, and features of value would be retained where possible.</p> <p>Conclusion</p>				

	We hope that the above information demonstrates that the site subject to this letter has significant potential for inclusion within the settlement boundary, and allocation for residential development.
Attached files (Please see Objective)	4904402 / 4904401 / 4904403
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	

Comment ID:	3371	Consultee Dr Keith Rodger	Agent	Do you consider the draft WHSAP is legally compliant?	
		Person ID: 472513	Person ID:	Do you consider the draft WHSAP is sound?	
To which part of the draft Wiltshire Housing Site Allocations Plan does this representation relate?		Figure	Do you consider the draft Wiltshire Housing Site Allocations Plan is unsound because it is not:		
Please identify the policy, paragraph, table, figure or site to which you are referring.					
Please give details of why you support or do not support the WHSAP including details of changes you consider necessary to make the draft Plan legally compliant / sound.	<p>My wife and I own Elmfield House and its garden. As you will know, part of the garden was recently the subject of planning application 18/00152/OUT and that this was opposed by your department because the area falls outside the current settlement boundary for Wiltshire. We note that other responses do not offer any unconditional rejection and that the conditions they impose are of the kind that would be expected: sight lines, water treatment, ecological and archaeological surveys etc. We are confident that these can be met</p> <p>The response from your department states that the extent of the settlement area is under review and the purpose of this letter is to request that the area designated in the subject planning application is included within that boundary.</p> <p>The area is small and lies between the Park and Ride to the West, the A 36 to the South and Elmfield House to the North. This plot could be considered to be an infill. The trees in the orchard are old and not very productive, many of the other trees and shrubs could remain and the gardens to any houses would be quite large causing little if any loss of amenity. The remainder of Elmfield House garden would remain untouched apart from the connecting drive.</p> <p>We hope that you can include this area in the settlement area and thus add at least a small number of houses towards Wiltshire quota.</p>				
Attached files (Please see Objective)					
If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?					

This document was published by the Spatial Planning team, Wiltshire Council, Economic Development and Planning Services.

For further information please visit the following website:

<http://www.wiltshire.gov.uk/wiltshsgsiteallocationsplan.htm>

Information about Wiltshire Council services can be made available in other formats (such as large print or audio) and languages on request. Please contact the council on 0300 456 0100, by textphone on (01225) 712500 or by email on customerservices@wiltshire.gov.uk.